

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF CHIHOLM ENERGY
OPERATING, LLC FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case Nos. 21849 and 21850

**APPLICATIONS OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO.**

Case Nos. 22161 - 22164

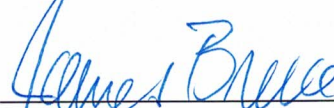
**RESPONSE IN OPPOSITION TO MOTION TO VACATE PRE-HEARING ORDER
AND SET A STATUS CONFERENCE**

Mewbourne Oil Company (“Mewbourne”) submits this response in opposition to the motion to vacate the pre-hearing order entered in these matters and set them for a status conference filed by Chisholm Energy Operating, LLC, (“Chisholm”) to vacate the pre-hearing order entered in these matters and set them instead for a status conference at the November 4th docket. In support thereof, the Mewbourne states:

1. Chisholm Case Nos. 21849 and 21850 seek to pool two 320-acre horizontal well spacing units in the Bone Spring formation underlying the E/2 of Section 7 and the E/2 of Section 18, Township 19 South, Range 33 East, NMPM, Lea County.
2. Mewbourne’s Case Nos. 22161 – 22164 collectively seek to pool all of Sections 18 and 19, Township 19 South, Range 33 East, NMPM, Lea County, as to the Bone Spring formation.
3. Mewbourne has proposed a two section JOA on Sections 18 and 19, which has approval from approximately 80% of the working interest owners.
4. Mewbourne has approved APDs in Sections 18 and 19.
5. Chisholm has the option to develop Section 7 with Section 6 to the north. (Chisholm apparently has development plans in Sections 2 & 11 and Sections 5 & 8 in this township, and it could do similar projects in Sections 6 & 7.)
6. Mewbourne’s applications were filed 2-1/2 months ago and there was sufficient time to file additional applications for November 4th. These matters should proceed to hearing.

WHEREFORE, Mewbourne requests that the motion be denied.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 27th day of October, 2021 by e-mail:

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