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

APPLICATIONS OF CHISHOLM ENERGY OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 21849 Case No. 21850 Case No. 22393 Case No. 22394

APPLICATIONSOF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 22161 Case No. 22162 Case No. 22163 Case No. 22164

UNOPPOSED MOTION FOR CONTINUANCE AND AMENDMENT OF PRE-HEARING ORDER

Apache Corporation ("Apache") requests the Division to (1) continue the February 3, 2022 hearing of the above-referenced competing cases and in lieu thereof hold a status conference; and (2) amend the pre-hearing order to reflect the revised hearing date for these matters. In support thereof, the Apache state:

1. In the above-referenced cases, Chisholm Energy Operating, LLC ("Chisholm") and Mewbourne Oil Company ("MOC") have opposing applications seeking orders pooling all mineral interests in the certain acreage in Lea County.

2. The Division entered an amended pre-hearing order on December 27, 2021 setting these cases for hearing on February 3, 2022.

3. Apache owns an interest in the proposed spacing units but was only recently provided notice of the MOC cases and needs additional time to evaluate its proposals and prepare for hearing.

Received by OCD: 1/25/2022 4:33:52 PM

4. Accordingly, Apache requests the February 3, 2022 hearing be vacated and the above-referenced cases be set for a status conference on February 3, 2022 and the hearing continued to a mutually convenient Division docket.

5. All parties concur in the granting of this Motion.

WHEREFORE, Apache requests the Division set the above-referenced cases for a status conference on February 3, 2022 and the hearing continued to the next mutually convenient Division docket and amend the amended pre-hearing order to reflect the revised hearing date.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: <u>/s/ Earl E. DeBrine, Jr.</u> Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 <u>edebrine@modrall.com</u> <u>dbennett@modrall.com</u> <u>jallen@modrall.com</u> *Attorneys for Apache Corporation*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed through the NMOCD

Electronic Permitting portal and e-mailed to the following counsel of record January 25 2022:

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421 mfeldewert@hollandhart.com agrankin@hollanthart.com Jbroggi@hollandhart.com Kaluck@hollandhart.com Attorneys for Chisholm Energy Operating

Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 <u>Ocean.Munds-Dry@conocophillips.com</u> <u>Beth.Ryan@conocophillips.com</u> *Attorneys for COG Operating LLC*

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: <u>/s/ Earl E. DeBrine, Jr.</u> Earl E. DeBrine, Jr.

W4310035.DOCX

Jobediah Rittenhouse Beatty & Wozniak, P.C. 216 16th St., Suite 1100 Denver, CO 80202 (303) 407-4499 JRittenhouse@bwenergylaw.com Attorneys for EOG Resources, Inc.

James Bruce P.O. Box 1056 Santa Fe, NM 87504 (505) 982-2043 jamesbruc@aol.com Attorneys for Mewbourne Oil Company