

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

**APPLICATION FOR AN ACCOUNTING FROM  
MEWBOURNE OIL COMPANY UNDER  
ORDER NOS. 21292 AND R-21293 AND TO DECLARE  
CERTAIN ACCOUNTING PRACTICES IMPROPER**

**CASE NO. 22378**

**MEWBOURNE OIL COMPANY'S RESPONSE TO SIANA OIL & GAS CO.'S  
EMERGENCY MOTION TO SUSPEND TIME FOR PAYING ESTIMATED COSTS  
AND REQUEST FOR BRIEFING SCHEDULE**

Mewbourne Oil Company ("Mewbourne") submits the following response in opposition to Siana Oil & Gas Co.'s ("Siana") Emergency Motion to Suspend Time for Paying Estimated Costs ("Motion") filed on March 11, 2022. In support of its response, Mewbourne states the following.

1. Siana's Motion fails to demonstrate that its claims warrant emergency action by the Oil Conservation Division ("Division") no later than March 17, 2022.

2. Siana's Motion contains more unsupported assertions about Mewbourne's alleged bad faith and improper conduct with regard to Order Nos. R-21804 and R-21805. Mewbourne denies Siana's allegations and believes that Siana's contentions are best left for the fact-finding hearing already set in this matter for April 21, 2022.

3. Further, Siana served its Motion on Mewbourne after 4 pm on Friday, March 11<sup>th</sup> and requests a hearing date less than four business days later, on March 17, 2022. This short amount of time is insufficient for Mewbourne to respond to the Motion and prepare for a hearing. In addition, Mewbourne's lead counsel in Case No. 22378 will be out of the country from March 12-26, 2022. Accordingly, Mewbourne requests that the Division allow it to file a response to

Siana's Motion by April 1, 2022. This deadline is reasonable and would comport with Mewbourne's constitutional right to due process.

WHEREFORE, Mewbourne requests the Oil Conservation Division deny Siana's request for an emergency hearing March 17, 2022 and set a briefing schedule that allows Mewbourne to respond to the Motion by April 1, 2022.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2022, I caused a true and correct copy of the foregoing document to be electronically served on the following:

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