

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

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

**Case Nos. 23708 & 23709**

**MEWBOURNE OIL COMPANY'S MOTION TO RESCIND OR DISMISS OBJECTION  
TO PRESENTATION OF CASE BY AFFIDAVIT**

Mewbourne Oil Company ("Mewbourne") submits this motion to rescind or dismiss a Notice of Objection to Hearing by Affidavit, and in support thereof, states:

1. In these cases Mewbourne seeks orders pooling all uncommitted mineral interest owners in the Wolfcamp formation underlying horizontal spacing units comprised of (a) the N/2 of Section 9 and the N/2 of Section 8, and (b) separately the S/2 of Section 9 and the S/2 of Section 8, all in Township 22 South, Range 27 East, NMPM. The unit will be dedicated to the Sandlot 9/8 Wolfcamp Fee wells. The cases are set for hearing on September 7, 2023.

2. Coterra Energy, Inc. and Cimarex Energy Co. (collectively "Cimarex") filed a Notice of Objection to Hearing by Affidavit on August 30, 2023.

3. Under Division Rules the cases would be set for a status conference on September 7th.

4. Mewbourne requests that the objection be rescinded or dismissed, and that the cases be set for hearing on September 7, or at the latest September 21. This is based on the following facts:

(a) Mewbourne sent updated proposals for the wells on April 27, 2023, which Cimarex received on May 4, 2023. Mewbourne has been planning these wells for over a year.

(b) The original hearing date was August 3, 2023, which was continued to September 7, 2023 due to COG Operating LLC's motion for a continuance. COG has now signed a JOA.

(c) Mewbourne asserts that Cimarex, which owns ~3% in the proposed contract area, has had sufficient time (over 4 months) to evaluate the well proposals or to discuss them with Mewbourne. With a small interest it is highly unlikely that Cimarex will be filing counter-applications.

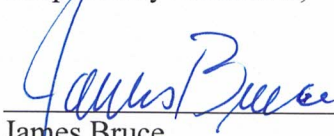
(d) Mewbourne has obligation dates, and has these wells set to spud in November 2023. Mewbourne needs to complete the pooling process given the time associated with issuance of orders and the subsequent time it will take to receive elections from the pooled parties.

5. Mewbourne does not want a hole in its drilling schedule.

6. This motion is opposed by Cimarex.

WHEREFORE, Mewbourne moves that the objection be rescinded or dismissed.

Respectfully submitted,

  
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Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 31<sup>st</sup> day of August, 2023 by e-mail:

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