

# Protested SWD Application

OXY USA Inc.,  
Premier Oil and Gas

## **Rose-Coss, Dylan H, EMNRD**

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**From:** Rose-Coss, Dylan H, EMNRD  
**Sent:** Friday, May 13, 2022 10:02 AM  
**To:** Tim Harrington  
**Cc:** Goetze, Phillip, EMNRD; Thompson, Joseph, EMNRD; Adam Rankin; ken.jones@premieroilgas.com  
**Subject:** Notification of Protest for Application to Inject: Penlon 15 Federal SWD No. 1\_ OXY USA WTP, Premier Oil and Gas, Inc.  
**Attachments:** 5.9.22.OXY protest.pdf; 5.11.22\_Premier Oil Protest.pdf

Tim Harrington,

The OCD was notified by OXY USA WTP, and Premier Oil and Gas, Inc., that they are protesting the Penlon 15 Federal SWD No. 1 application. The parties have been identified as affected persons for the location being considered. Because of the protests, the application can no longer be reviewed administratively. You are being notified that for this application to be considered, Mewbourne currently has two options; the first is to go to hearing, the second is to negotiate a resolution with the protesting parties. If the protests are withdrawn, then the application can be reviewed administratively. In the meantime, the application will be retained pending a hearing or other resolution. Please continue to provide OCD with information regarding the standing of this application and feel free to call me with any questions.

Contact for OXY USA WTP

Adam G. Rankin  
Partner, Holland & Hart LLP  
110 N. Guadalupe, Suite 1, Santa Fe, NM 87501  
Direct 505.954.7294 Cell 505.570-0377 Main 505.988.4421

Contact for Premier Oil and Gas, Inc.

Kenneth C. Jones  
President  
P.O. Box 837205  
Richardson, TX 75083-7205  
972-470-0228

Regards,

**Dylan Rose-Coss**

*Petroleum Specialist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

C: (505) 372-8687

## Rose-Coss, Dylan H, EMNRD

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**From:** Adam Rankin <AGRankin@hollandhart.com>  
**Sent:** Monday, May 9, 2022 1:43 PM  
**To:** Engineer, OCD, EMNRD  
**Cc:** Goetze, Phillip, EMNRD; Paula M. Vance  
**Subject:** [EXTERNAL] Mewbourne Penlon 15 Federal SWD #1 - protest by OXY USA WTP Limited Partnership  
**Attachments:** C-108 APP == Penlon 15 Federal SWD #1.pdf

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Dear Examiners,

Please note that OXY USA WTP Limited Partnership timely protests the attached administrative application filed by Mewbourne Oil Company for its Penlon 15 Federal SWD #1.

Thank you.

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**Adam G. Rankin**

Partner, Holland & Hart LLP

110 N. Guadalupe, Suite 1, Santa Fe, NM 87501

Direct 505.954.7294 Cell 505.570-0377 Main 505.988.4421



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May 10, 2022

REC'D MAY 11 2022

Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

RE: Application to Inject  
Penlon 15 Federal SWD #1  
Section 15, Township 20 South, Range 27 East  
660' FSL & 810' FWL  
Eddy County, NM

Dear Sir/Madam,

On April 26, Premier Oil & Gas Inc. has received a copy of Mewbourne Oil Company's C-108 Application for the Penlon 15 Federal SWD #1. Premier notified Tim Harrington with Mewbourne on April 26 of our opposition (see attached email chain). Premier Oil & Gas Inc. wishes to oppose this application on the basis that we have leases within the 2-mile radius with Morrow wells that will eventually produce from the Cisco-Canyon formation. Furthermore, this acreage will be capable of producing from the Lower Wolfcamp Shale via horizontal wells.

Premier reserves the right to elect counsel once Mewbourne's counsel is identified.

Regards,

A handwritten signature in blue ink, appearing to read 'Kenneth C. Jones', is written over the typed name.

Kenneth C. Jones  
Premier Oil & Gas Inc.  
President



April 25, 2022

Premier Oil and Gas Inc.  
901 Waterfall Way, Suite 201  
Richardson, TX 75080

Re: Application to Inject  
Penlon 15 Federal SWD #1  
Section 15, Township 20 South, Range 27 East  
660' FSL & 810' FWL  
Eddy County, New Mexico

To Whom It May Concern,

Enclosed for your review is a copy of Mewbourne Oil Company's C-108 Application to Inject for the captioned well. As required by the New Mexico Oil Conservation Division, you are being noticed because you have been identified as the surface owner, mineral owner or a leasehold operator within a one-mile radius of the proposed well location. If you object to the application, you must file a written objection and/or request for hearing with the Division within 15 days of receipt of this notice. The Division's address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505.

Should you have any questions, please contact us at (903) 534-7647.

Sincerely yours,

**MEWBOURNE OIL COMPANY**

Tim Harrington  
Reservoir Engineer  
tharrington@mewbourne.com