

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

**APPLICATION OF ROCKWOOD RESOURCES, LLC, et al.,
TO REOPEN MEWBOURNE OIL COMPANY'S
POOLING CASE NO. 21390, LEA COUNTY, NEW MEXICO**

**Reopen Case No. 22539
Re: Case No. 21390; Order No. R-21527**

**APPLICATION OF ROCKWOOD RESOURCES, LLC, et al.,
TO REOPEN MEWBOURNE OIL COMPANY'S
POOLING CASE NO. 21391, LEA COUNTY, NEW MEXICO**

**Reopen Case No. 22540
Re: Case No. 21391; Order No. R-21528**

**NOTICE OF ERRATUM TO RESPONSE TO MEWBOURNE OIL
COMPANY'S SECOND MOTION TO DISMISS**

Rockwood Resources, LLC ("Rockwood"), Christine Brock ("Brock"), and Rebecca J. Babbitt ("Babbitt") (collectively "Rockwood Group"), through its undersigned attorneys, respectfully submits this notice of erratum to Response to Mewbourne Oil Company's Second Motion to Dismiss ("Response") filed on March 25, 2022. Rockwood Group files this Notice of Erratum to correct a scrivener's error in the first sentence of Paragraph 41 of said Response. The error consists of the inadvertent inclusion of "not" in the subjunctive clause, "If the Division finds that Mewbourne did not exercise reasonable diligence...." "Not" should not have been included in the phrase, and the subjunctive clause should have read: "If the Division finds that Mewbourne did exercise reasonable diligence...."

With the proper correction, the sentence as a whole should read: "41. If the Division finds that Mewbourne did exercise reasonable diligence in attempting to locate Brock, allowing

Rockwood to participate in the Eastwatch Wells with the Brock WI would facilitate the Division's obligation to protect correlative rights provided that Rockwood's December 15, 2021 request to participate was made during the election period provided to other WI owners." Paragraph 41 in its entirety with the corrected first sentence is attached hereto as Exhibit 1.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage

Darin C. Savage

William E. Zimsky
Paula M. Vance
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
bill@abadieschill.com
paula@abadieschill.com
andrew@abadieschill.com

Attorneys for Rockwood Resources, LLC, et al.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on March 28, 2022:

Dana S. Hardy
Michael Rodriguez
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Fax: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com
Attorneys for Mewbourne Oil Company

/s/ Darin C. Savage

Darin C. Savage

EXHIBIT 1

Paragraph 41, with correction of first sentence, of Response to Mewbourne Oil Company's Second Motion to Dismiss:

41. If the Division finds that Mewbourne did exercise reasonable diligence in attempting to locate Brock, allowing Rockwood to participate in the Eastwatch Wells with the Brock WI would facilitate the Division's obligation to protect correlative rights provided that Rockwood's December 15, 2021 request to participate was made during the election period provided to other WI owners. In addition, as long as Rockwood's request to participate was made prior to Mewbourne completing either or both of the Eastwatch Wells, issuing an order allowing Rockwood to participate in those wells will protect Rockwood's correlative rights without affecting the correlative rights of any other WI owner and will not prejudice Mewbourne since the request to participate was made prior to determining whether participating in the well was economically advantageous as opposed to being a "Non-Consenting Pooled Working Interest Owner" under ¶ 23 of the Pooling Orders.