

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

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

CASE NOS. 23708 & 23709

**AMERICAN RESPONSE TO MEWBOURNE AND REQUEST FOR A MOTION FOR
CONTINUANCE OF THE STATUS CONFERENCE**

Jonathan Samaniego on behalf of American Energy Resources LLC (“American”) submits a motion for continuance of the status conference.

1. Mr. Bruce and Mewbourne statements are without merit.
2. American is a lease holder in the above referenced cases.
3. American has terminated Oxy lease in this unit. (“See Attached”)
4. American did not receive a notice of the hearing by Mewbourne. Operators will often send out well proposals far in advance of a planned hearing, a number of which are never acted upon, and owners will not become aware that an operator is serious about a well proposal until notice of a pooling is received.
5. American has permits and drilling commitments in its lease hold and correlative rights that must be protected.
6. Mewbourne Oil Company has no rights to American lease hold interests.
7. 19.15.4.10 (D) A party shall be entitled to a continuance of any hearing if it did not receive notice of the hearing.
8. 19.15.4.26 (A) A Party with great respect to the issues, interested participant or participant's representative advocate a position to the proceedings unless the other parties of record have an opportunity to be present.
9. American was not notified of the hearing and was not given time to prepare for the hearing.
10. Mr. Bruce or Mewbourne have provided no evidence of a certified letter mailed to American and notifying American Energy Resources LLC.
11. For the Division to follow through with a hearing of any kind would be premature and would create negative consequences for an affected parties.
12. American owns 320 lease hold.
13. Mr. Bruce and Mewbourne withdraw from pooling American interests is furthermore evidence to dismiss this case.
14. Mewbourne has more than enough acreage to drill in their own lease and has no rights to encroach on American lease hold interests, Mewbourne has admittedly withdrew from pooling American lease hold, furthermore reason to dismiss this case.
15. 70-2-17 afford to the owner of each property in a pool the opportunity to produce his just and equitable share of the oil and gas.
16. American is respectfully requesting from the Division to dismiss the above mentioned cases or to allow American additional time get matters in order, put together a status conference report, and to prepare for the status conference hearing. During such time would be very encouraging for negotiations between Mewbourne and American, and therefore, An October hearing will not work for American, and furthermore, American requests that the hearing be continued to January 18, 2024, if that docket is available for hearing, if not then the following first hearing date in February 2024 would be acceptable.

Respectfully,
Jonathan Samaniego
American Energy Resources LLC