

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

**APPLICATIONS OF PERMIAN RESOURCES  
OPERATING, LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO** **CASE NOS. 24798, 24800, 24803-24804**

**APPLICATIONS OF PERMIAN RESOURCES  
OPERATING, LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO** **CASE NOS. 25079-25080**

**APPLICATIONS OF ALPHA ENERGY PARTNERS II, LLC,  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO** **CASE NOS. 25086-25090 and 25101**

**MEWBOURNE OIL COMPANY’S MOTION FOR CONTINUANCE**

Mewbourne Oil Company (“Mewbourne”) requests that the New Mexico Oil Conservation Division (“Division”) vacate the January 14, 2025 contested hearing in these matters and set the cases for a status conference on the next available docket. As grounds therefore, Mewbourne states:

1. Permian Resources Operating, LLC (“Permian Resources”) filed its applications in Case Nos. 24798, 24800, 24803, 24804, 24805, and 24806 for the Outlaw 14 Fed Com wells (hereinafter referred to as the “Outlaw Cases”) on August 14, 2024.

2. Alpha Energy Partners II, LLC (“Alpha”) entered its appearance in the Outlaw Cases on September 5, 2024.

3. On December 10, 2024, Permian Resources filed a notice of dismissal, dismissing Case Nos. 24805 – 24806. Permian Resources also filed two replacement applications, Case Nos. 25079 and 25080.

4. That same day, Alpha filed competing applications in Case Nos. 25086, 25087, 25088, 25089, 25090, and 25101 for its Dude Abides 14-13 Fed Com wells (hereinafter referred

to as the “Dude Abides Cases”).

5. Permian Resources’ and Alpha’s Outlaw and Dude Abides Cases seek to pool all of Sections 13 and 14, Township 22 South, Range 26 East, Eddy County, New Mexico.

6. Mewbourne owns a working interest in this acreage and has determined that the acreage would be best developed with its own development plan. *See* Self-Affirmed Statement of T. Jolly, attached hereto as Exhibit A. Mewbourne was able to make this determination after reviewing all of the competing applications, many of which were filed less than one month ago.

7. Mewbourne sent out well proposal letters for its Buffalo Bayou wells on December 27, 2024, which cover all of Sections 13 and 14, Township 22 South, Range 26 East, Eddy County, New Mexico. *See* Exhibit A at ¶ 9; Exhibit 1 to Exhibit A.

8. Mewbourne intends to file applications for its Buffalo Bayou wells for the Division’s February 13, 2025 docket. *See* Exhibit A at ¶ 10.

9. To allow the Division to consider all of the competing development plans and identify the plan that will best protect correlative rights and prevent waste in accordance with the Oil and Gas Act, Mewbourne requests that the Division issue an order vacating the January 14<sup>th</sup> contested hearing and set these matters for a status conference on the next available docket.

10. In addition, due to the numerous parties with competing development plans, the requested continuance would allow more time for the parties to negotiate and attempt to reach a resolution.

11. It is Mewbourne’s understanding that Red River Energy Partners LLC and RREP Royalties, LLC planned to request a continuance to allow additional time for a resolution but were unable to do so due to their counsel’s unavailability.

12. Counsel for Permian Resources, Alpha, COG Operating LLC, Concho Oil and Gas,

LLC, ConocoPhillips, Red River Energy Partners LLC and RREP Royalties, LLC, Bill Taylor Jr., Harvey Taylor, Marilyn Taylor, Storme Dorenkamp, Tracy Wise, and Stacy Patrick concur in this motion.

WHEREFORE, Mewbourne respectfully requests that the Division vacate the contested hearing currently set for January 14, 2025, and set these cases for a status conference on the Division's January 23, 2025 docket.

Respectfully submitted,

HINKLE SHANOR LLP

*/s/ Dana S. Hardy* \_\_\_\_\_

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*Attorneys for Mewbourne Oil Company*

## CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2024, I caused a true and correct copy of the foregoing motion to be served upon:

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*/s/ Dana S. Hardy*

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**SELF-AFFIRMED STATEMENT OF TYLER JOLLY**

1. I am over 18 years of age and am competent to provide this Self-Affirmed Statement. I have personal knowledge of the matters addressed herein.

2. I am a landman for Mewbourne Oil Company (“Mewbourne”). I have had direct involvement with the acreage that is the subject of Permian Resources Operating, LLC’s and Alpha Energy Partners II, LLC’s applications in Case Nos. 24798, 24800, 24803, 24804, 25079, 25080, 25086-25090, and 25101.

3. I have previously testified before the Division and my qualifications as an expert in petroleum land matters were accepted.

4. Permian Resources Operating, LLC (“Permian Resources”) filed its applications in Case Nos. 24798, 24800, 24803, 24804, 24805, and 24806 for the Outlaw 14 Fed Com wells (hereinafter referred to as the “Outlaw Cases”) on August 14, 2024.

5. On December 10, 2024, Permian Resources filed a notice of dismissal, dismissing Case Nos. 24805 – 24806. Permian Resources also filed two (2) replacement applications (Case

Nos. 25079 and 25080) for its Outlaw Cases.

6. That same day, Alpha filed competing applications in Case Nos. 25086, 25087, 25088, 25089, 25090, and 25101 for its Dude Abides 14-13 Fed Com wells (hereinafter referred to as the “Dude Abides Cases”).

7. Permian Resources’ and Alpha’s Outlaw and Dude Abides Cases seek to pool all of Sections 13 and 14, Township 22 South, Range 26 East, Eddy County, New Mexico.

8. Mewbourne owns a working interest in this acreage and has determined that the acreage would be best developed with its own development plan. As a result, Mewbourne sent out well proposal letters for its Buffalo Bayou wells on December 27, 2024, which cover all of Sections 13 and 14, Township 22 South, Range 26 East, Eddy County, New Mexico. *See* 12/27/24 Well Proposal, attached hereto as Exhibit 1.

9. Mewbourne intends to file applications for its Buffalo Bayou wells for the Division’s February 13, 2025 docket. *See* Exhibit A at ¶ 10.

10. To allow the Division to consider all of the competing development plans and identify the plan that will best protect correlative rights and prevent waste, Mewbourne requests that the Division issue an order vacating the January 14<sup>th</sup> contested hearing and set these matters for a status conference on the next available docket.

11. In addition, due to the numerous parties with competing development plans, the requested continuance would allow more time for the parties to negotiate and attempt to reach a resolution.

12. I understand that this Self-Affirmed Statement will be used as written testimony in this

case. I affirm that my testimony above is true and correct and is made under penalty of

perjury under the laws of the State of New Mexico. My testimony is made as of the date  
handwritten next to my signature below.

  
Tyler Jolly

11/7/2025  
Date



# MEWBOURNE OIL COMPANY

500 West Texas, Suite 1020  
Midland, Texas 79701  
Phone (432) 682-3715

December 27, 2024

## Certified Mail

Permian Resources Operating LLC  
300 N. Marienfeld Street, Suite 1000  
Midland, Texas 79701  
Attn: New Mexico Land Manager

Re: Buffalo Bayou 14/13 Working Interest Unit  
All of Section 14 and All of Section 13  
T22S, R26E, Eddy County, New Mexico

Ladies and Gentlemen:

Mewbourne Oil Company ("MOC"), as Operator, hereby proposes creating a working interest unit and nonstandard spacing unit comprising All of Section 14 and All of Section 13, T22S, R26E, Eddy County, New Mexico. As part of the initial development, MOC also proposes drilling the following wells:

- 1) BUFFALO BAYOU 14/13 FED COM #521H – API #pending  
Surface Location: 2220' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 660' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 6980'  
Proposed Total Measured Depth: 17185'  
Target: 2<sup>nd</sup> Bone Spring Sand
  
- 2) BUFFALO BAYOU 14/13 FED COM #523H – API #pending  
Surface Location: 2280' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 1980' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 6980'  
Proposed Total Measured Depth: 17185'  
Target: 2<sup>nd</sup> Bone Spring Sand
  
- 3) BUFFALO BAYOU 14/13 FED COM #526H – API #pending  
Surface Location: 2470' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 1980' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 6980'  
Proposed Total Measured Depth: 17185'  
Target: 2<sup>nd</sup> Bone Spring Sand

**EXHIBIT 1**

- 4) BUFFALO BAYOU 14/13 FED COM #528H – API #pending  
Surface Location: 2530' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 660' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 6980'  
Proposed Total Measured Depth: 17185'  
Target: 2<sup>nd</sup> Bone Spring Sand
  
- 5) BUFFALO BAYOU 14/13 FED COM #711H – API #pending  
Surface Location: 2200' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 495' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 8820'  
Proposed Total Measured Depth: 18950'  
Target: Wolfcamp Sand
  
- 6) BUFFALO BAYOU 14/13 FED COM #713H – API #pending  
Surface Location: 2260' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 1815' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 8820'  
Proposed Total Measured Depth: 18950'  
Target: Wolfcamp Sand
  
- 7) BUFFALO BAYOU 14/13 FED COM #715H – API #pending  
Surface Location: 2450' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 2145' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 8820'  
Proposed Total Measured Depth: 18950'  
Target: Wolfcamp Sand
  
- 8) BUFFALO BAYOU 14/13 FED COM #717H – API #pending  
Surface Location: 2510' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 825' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 8820'  
Proposed Total Measured Depth: 18950'  
Target: Wolfcamp Sand
  
- 9) BUFFALO BAYOU 14/13 FED COM #822H – API #pending  
Surface Location: 2240' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 825' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 9400'  
Proposed Total Measured Depth: 19540'  
Target: Wolfcamp Shale

- 10) BUFFALO BAYOU 14/13 FED COM #824H – API #pending  
Surface Location: 2300' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 2145' FNL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 9400'  
Proposed Total Measured Depth: 19540'  
Target: Wolfcamp Shale
  
- 11) BUFFALO BAYOU 14/13 FED COM #826H – API #pending  
Surface Location: 2490' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 1815' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 9400'  
Proposed Total Measured Depth: 19540'  
Target: Wolfcamp Shale
  
- 12) BUFFALO BAYOU 14/13 FED COM #828H – API #pending  
Surface Location: 2550' FNL & 300' FEL (Section 15, T22S, R26E)  
Bottom Hole Location: 495' FSL & 100' FEL (Section 13, T22S, R26E)  
Proposed Total Vertical Depth: 9400'  
Proposed Total Measured Depth: 19540'  
Target: Wolfcamp Shale

The wells are planned to be pad drilled with the first well tentatively planned to spud 2<sup>nd</sup> quarter of 2024 depending on rig availability and commodity prices. In the event you elect to participate in the above referenced wells, please execute the enclosed AFEs before returning them to the undersigned within thirty (30) days. After receipt of the executed AFEs, our Operating Agreement will be sent naming MOC as Operator providing a drilling well rate of \$12,000 per month and a producing well rate of \$1200 per month. Please enclose your most current well information requirements so that we may supply well data when available.

Please contact me at (432) 682-3715 or via email at [tjolly@mewbourne.com](mailto:tjolly@mewbourne.com) if you have any questions.

Very truly yours,

**MEWBOURNE OIL COMPANY**



Tyler Jolly  
Landman

Enclosures