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

APPLICATIONS OF CHIHOLM ENERGY OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case Nos. 21849 and 21850

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

Case Nos. 22161 - 22164

RESPONSE IN OPPOSITION TO MOTION TO VACATE PRE-HEARING ORDER AND SET A STATUS CONFERENCE

Mewbourne Oil Company ("Mewbourne") submits this response in opposition to the motion to vacate the pre-hearing order entered in these matters and set them for a status conferencefiled by Chisholm Energy Operating, LLC, ("Chisholm") to vacate the pre-hearing order entered in these matters and set them instead for a status conference at the November 4th docket. In support thereof, the Mewbourne states:

- 1. Chisholm Case Nos. 21849 and 21850 seek to pool two 320-acre horizontal well spacing units in the Bone Spring formation underlying the E/2 of Section 7 and the E/2 of Section 18, Township 19 South, Range 33 East, NMPM, Lea County.
- 2. Mewbourne's Case Nos. 22161 22164 collectively seek to pool all of Sections 18 and 19, Township 19 South, Range 33 East, NMPM, Lea County, as to the Bone Spring formation.
- 3. Mewbourne has proposed a two section JOA on Sections 18 and 19, which has approval from approximately 80% of the working interest owners.
 - 4, Mewbourne has approved APDs in Sections 18 and 19.
- 5. Chisholm has the option to develop Section 7 with Section 6 to the north. (Chisholm apparently has development plans in Sections 2 & 11 and Sections 5 & 8 in this township, and it could do similar projects in Sections 6 & 7.)
- 6. Mewbourne's applications were filed 2-1/2 months ago and there was sufficient time to file additional applications for November 4th. These matters should proceed to hearing.

WHEREFORE, Mewbourne requests that the motion be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this ______ day of October, 2021 by e-mail:

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