

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

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

Case No. 20679

MOTION FOR CONTINUANCE OF HEARING

Bill G. Taylor, Jr., Harvey R. Taylor, Marilyn S. Taylor, Carolyn A. (Taylor) Schrock, Wanda Taylor, and Kathy J. Smith (collectively “Movants” or the “Taylors”), request the hearing examiner to continue the above-referenced matter set for hearing on August 8, 2019, for the following reasons:

1. On July 19, 2019, Bill G. Taylor received correspondence from James Bruce, counsel for Applicant, Mewbourne Oil Company, notifying him of Mewbourne’s Application.
2. Mr. Taylor forwarded Mr. Bruce’s correspondence to and retained the undersigned counsel (Derek Larson) to represent the Taylors’ interests in this matter.
3. Mr. Larson entered his appearance in this matter on the Taylors’ behalf on July 24, 2019.
4. Preliminary review of the Application, relevant leases and deeds affecting the interests, and correspondence between the Applicant and the Taylors reveals that a title dispute exists which would negate the legal basis upon which Applicant claims the right to drill and develop the subject property.
5. The Application does not disclose whether Applicant relies on any interests, other than the Taylors’, in support of Applicant’s claim to hold the right to drill the proposed Zeppelin wells or to develop the southern half of section 32, of

Township 23 South, Range 28 East in Eddy County (the “Proposed Pooled Property”).

6. Applicant’s legal basis and right to drill and develop the Proposed Pooled Property is a fundamental prerequisite to its standing to force pool the Taylors’ interest therein.
7. Movants request a continuance of the August 8, 2019, hearing date to allow counsel the opportunity to discover and review the entirety of Applicant’s legal and contractual basis to drill and develop the property. This information is necessary to enable counsel to adequately prepare for a hearing on the Application, including the identification of exhibits and witnesses, and would serve to expedite and streamline the hearing while avoiding potentially unnecessary testimony, examination, and undue delay during the hearing itself.
8. Mewbourne Oil Company opposes this Motion.

WHEREFORE, Movants request a continuance of the hearing currently scheduled to take place on August 8, 2019, with respect to the above-referenced matter.

Respectfully submitted this 30th day of July, 2019.



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CERTIFICATE OF SERVICE

The undersigned certifies that on the 30th day of July, 2019, a true and correct copy of the foregoing *Motion for Continuance of Hearing* was emailed and mailed to:

VIA EMAIL AND U.S. MAIL:

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

A handwritten signature in blue ink, appearing to read "Derek V. Larson", written over a horizontal line.

Derek V. Larson