

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF ASCENT ENERGY, LLC
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 16481

ASCENT'S OPPOSED MOTION FOR A CONTINUANCE

I. REQUEST.

1. Ascent Energy, LLC ("Ascent") moves for a continuance of the hearing set in this case, and in the following related cases:

**APPLICATION OF ASCENT ENERGY, LLC
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 16482

**APPLICATION OF APACHE CORPORATION
FOR COMPULSORY POOLING AND APPROVAL
OF A HORIZONTAL SPACING UNIT AND
DEVELOPMENT AREA, EDDY COUNTY.**

Case No. 20171

**APPLICATION OF APACHE CORPORATION
FOR COMPULSORY POOLING AND APPROVAL
OF A HORIZONTAL SPACING UNIT AND
DEVELOPMENT AREA, EDDY COUNTY.**

Case No. 20202

In support thereof, Ascent states:

II. FACTS.

2. Ascent seeks the following in its cases:

Case No. 16481: Ascent seeks an order pooling all mineral interests in the Bone Spring formation underlying a 320-acre standup horizontal spacing comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, NMPM.

Case No. 16482: Ascent seeks an order pooling all mineral interests in the Wolfcamp formation underlying a 320-acre standup horizontal spacing unit comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, NMPM.

3. Apache Corporation (“Apache”) seeks the following in its cases:

Case 20171: Apache seeks an order pooling all mineral interests (apparently in the Bone Spring formation) underlying an 800-acre laydown horizontal spacing comprised of the N/2 of Section 28, N/2 of Section 29, and NE/4 of Section 30, Township 20 South, Range 30 East, NMPM.

Case 20202: Apache seeks an order pooling all mineral interests (apparently in the Wolfcamp formation) underlying an 800-acre laydown horizontal spacing unit comprised of the N/2 of Section 28, N/2 of Section 29, and NE/4 of Section 30, Township 20 South, Range 30 East, NMPM.

4. Exhibit A shows Ascent’s acreage in this area. Please note that Apache owns no interest in Section 28.

III. MOTION FOR A CONTINUANCE.

5. This matter is currently set for a special hearing on August 20, 2019.

6. Recently Ascent was recently able to obtain the services of a drilling rig, and has commenced drilling a number of its well locations in Southeast New Mexico.

7. Key Ascent personnel who are going to testify at the hearing need to be on the rig full time running operations while the wells are being drilled. Because Ascent is not a large company, it does not have replacements for these witnesses. As a result, all of its proposed witnesses cannot be present in Santa Fe next week, and Ascent seeks a continuance of the hearing.

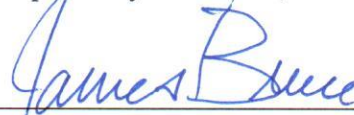
8. In addition, the ads for the two Apache cases do not identify the formations being pooled; they only identify the acreage Apache requests to be pooled. Thus, in any event, its applications will need to be continued for notice purposes.

9. Mewbourne Oil Company does not oppose this request. The position of EOG Resources, Inc. is unknown.

10. Apache opposes this motion.

WHEREFORE, Ascent requests that the hearing scheduled for August 20th be vacated and the matters be continued to September 19, 2019 so that a special date can be arranged for a date when Ascent’s witnesses are available for hearing.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Ascent Energy, LLC

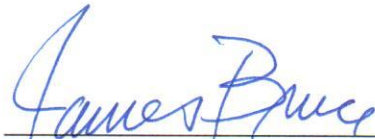
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 13th day of August, 2019 via e-mail:

Earl DeBrine
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Ernest Padilla
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James Bruce

Anvil Development Area
Township 20 South, Range 30 East
Section 28: W2
Section 33: W2
640.00 Gross Acres
Eddy County, NM



Anvil Development Area

: Ascent Acreage

Ascent Energy, LLC

Exhibit

Location Map

T20S-R30E

EXHIBIT

A