

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

**APPLICATION OF CHEVRON U.S.A. INC. FOR
AN OVERLAPPING SPACING UNIT IN THE
BONE SPRING FORMATION AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

Case No. 21499

**APPLICATION OF CHEVRON U.S.A. INC. FOR
AN OVERLAPPING SPACING UNIT IN THE
WOLFCAMP FORMATION AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

Case No. 21500

**MEWBOURNE'S PARTIAL RESPONSE IN OPPOSITION TO CHEVRON'S MOTION
TO STAY COMPETING DRILLING PERMITS**

Mewbourne Oil Company ("Mewbourne") submits this partial response in opposition to the Motion to Stay Mewbourne's Competing Drilling Permits (the "Motion") filed by Chevron U.S.A. Inc. ("Chevron"). In support of its response, Mewbourne states:

1. In these cases Chevron seeks orders pooling well units in the Bone Spring and Wolfcamp formations in the E/2 of Section 26 and the E/2 of Section 35, Township 23 South, Range 28 East, N.M.P.M.. These cases are set on the Division's November 5, 2020 docket.
2. Mewbourne, as operator under a JOA covering Section 35, submitted well proposals to working interest owners for competing wells in the E/2 of Section 35. APDs for the wells have been issued, but well commencement is not imminent.
3. Chevron filed its Motion on October 7, 2020.
4. The parties are in discussions to try to resolve their differences.
5. As a result, Mewbourne requests until Tuesday, October 20, 2020 to respond to the Motion to determine if the parties might come to a voluntary agreement, resulting in the Motion being withdrawn.

WHEREFORE, Mewbourne requests that the Division refrain from deciding the Motion until after October 20, 2020 to see if the parties might amicably resolve their differences.

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 19th day of October, 2020 via e-mail:

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