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

APPLICATIONS OF COLGATE CORPORATION FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO. Ca

Case Nos. 21072, 21074, 21075, and 21092

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

Case Nos. 21325-21328

JOINT MOTION TO VACATE PRE-HEARING ORDER AND SET A STATUS CONFERENCE

EOG Resources, Colgate Corporation and Mewbourne Oil Company (collectively the "Movants") request that the Division vacate the pre-hearing order entered in these matters and set these matters for a status conference on the July 15, 2021, hearing docket. In support thereof, the Movants state:

- 1. On January 21, 2012, the Division entered a Prehearing Order setting these contested pooling cases for a hearing on April 22, 2021.
- 2. Since that time, EOG, Colgate and Mewbourne have been engaged in productive trade discussions that they believe may resolve all or parts of these contested cases.
- 3. In order to avoid a potentially unnecessary hearing, and to allow the trade discussions to continue uninterrupted, the Movants request that the prehearing order be vacated and the matters set for a status conference on the July 15th hearing docket.
- 4. Counsel for Yates Energy Corporation, Jalapeno Corporation, Chi Energy, Inc., and MRC Delaware Resources, LLC, who have also appeared in these matters, have been contacted and do not oppose this motion.

WHEREFORE, the Movants request the pre-hearing order and April 22nd hearing date for these matters be vacated and that these matters be scheduled for a status conference on July 15, 2021.

Submitted by:

HOLLAND & HART, LLP

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

mfeldewert@hollandhart.com

agrankin@hollanthart.com

Jbroggi@hollandhart.com

kaluck@hollandhart.com

Attorneys for EOG Resources, Inc. and MRC

Delaware Resources, LLC

Approved by:

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: approved via email

Earl E. DeBrine, Jr.

Lance D. Hough

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

ldh@modrall.com

Attorneys for Colgate Operating LLC

By: approved via email

James Bruce

P.O. Box 1056

Santa Fe, NM 87504

jamesbruc@aol.com

Attorney for Mewbourne Oil Company and Chi

Energy, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

J.E. Gallegos
Michael J. Condon
GALLEGOS LAW FIRM, P.C.
460 St. Michael's Drive, Bldg. 300
Santa Fe, New Mexico 87505
jeg@gallegoslawfirm.net
mjc@gallegoslawfirm.net

Attorneys for Yates and Jalapeno

Michael H. Feldewert