

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

OIL & GAS DOCKET NO. 01-0321091

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLIHAN, M. W. (04606) LEASE, WELL NOS. 1 AND 2, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

OIL & GAS DOCKET NO. 01-0321092

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLIHAN, M.W. (06360) LEASE, WELL NOS. C1, C2, AND C3, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

OIL & GAS DOCKET NO. 01-0321093

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLAHAN, M. W. (03717) LEASE, WELL NOS. 1, 2, AND 3, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

OIL & GAS DOCKET NO. 01-0321094

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLIHAN, M.W. -B- (10664) LEASE, WELL NO. 6A, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

OIL & GAS DOCKET NO. 01-0321095

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLIHAN, M. W. -A- (06371) LEASE, WELL NO. B1, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

OIL & GAS DOCKET NO. 01-0321096

SINGLE SIGNATURE P-4 FILING BY MEB, LLC (OPERATOR NO. 556895) FOR THE CALLAHAN, M. W., -A- (03808) LEASE, WELL NO. 5A, LULING-BRANYON FIELD, CALDWELL COUNTY, TEXAS, TO CHANGE THE OPERATOR FROM EAGLE FORD OIL CO., INC. (OPERATOR NO. 238351) TO MEB, LLC

FINAL ORDER

The Commission finds that after notice and opportunity for hearing, the operator of the captioned leases did not respond, and the dockets proceeded as a default. The proceeding having been duly submitted to the Railroad Commission of Texas at conference held in its offices in Austin, Texas, the Commission makes the following Findings of Facts and Conclusions of Law.

FINDINGS OF FACT

1. At least twenty days' notice was given to Eagle Ford Oil Co., Inc. (Operator No. 238351), ("Eagle Ford"), and MEB, LLC (Operator No. 556895), ("MEB").
2. Eagle Ford is the operator of record for the above-referenced leases and wells in the Luling-Branyon Field, Caldwell County, Texas.
3. On or about June 7, 2019, MEB submitted to the Commission in each of the above-referenced dockets a Form P-4 *Certificate of Compliance and Transportation Authority* requesting transfer of the subject wells and leases, from Eagle Ford to MEB, as operator of record.
4. All Commission correspondence to Eagle Ford was sent via United States Postal Service first-class mail to Eagle Ford's address of record, as set forth on Eagle Ford's most recent Form P-5 *Organization Report*.
5. All Commission correspondence to MEB was sent via United States Postal Service first-class mail to MEB's address of record, as set forth on MEB's most recent Form P-5 *Organization Report*.
6. On or about July 11, 2019, the Administrative Law Judge requested in writing that Eagle Ford either (1) provide evidence that it holds a good faith claim to a continuing right to operate the referenced properties or (2) request a hearing on the matter on or before August 12, 2019. This writing expressly notified the operator that failure to timely request a hearing would constitute waiver of the opportunity to request a hearing on the matter.
7. Eagle Ford's Form P-5 is delinquent. Eagle Ford was exempt as to its financial assurance at the time of the last Form P-5 annual renewal submission.
8. MEB's Form P-5 is active. MEB has a \$50,000.00 bond as its financial assurance.
9. A "good faith claim" is defined in Commission Statewide Rule (15)(a)(5) as "a factually supported claim based on a recognized legal theory to a continuing possessory right in the mineral estate, such as evidence of a currently valid oil and gas lease or a recorded deed conveying a fee interest in the mineral estate."
10. No production has been reported on the subject lease since July 2014.
11. Eagle Ford failed to reply to the Administrative Law Judge's letter dated July 11, 2019, with any documents that it holds a "good faith claim" to a continuing right to operate the subject wells and leases and failed to timely request a hearing.
12. Eagle Ford does not have a "good faith claim" to operate the subject wells and leases.
13. Pursuant to TEX. GOV'T CODE §§ 2001.056 and 2001.062(e), Eagle Ford and MEB have waived the opportunity to request a hearing on the matter.

14. MEB now asserts a "good faith claim" to a continuous right to operate the subject wells and leases.
15. The subject leases and wells in the Luling-Branyon Field, Caldwell County, Texas, should be transferred to MEB as operator of record.

CONCLUSIONS OF LAW

1. Proper notice of hearing was timely issued to appropriate persons entitled to notice.
2. All things necessary to the Commission attaining jurisdiction has occurred.
3. Resolution of these dockets is a matter committed to the jurisdiction of the Commission. TEX. GOV'T CODE §§ 81.051.
4. Eagle Ford does not have a "good faith claim" to continue to operate the subject leases and wells.
5. MEB does have a "good faith claim" to continue to operate the subject leases and wells.

IT IS THEREFORE ORDERED that the applications of MEB, LLC for transfer of the Form P-4 *Certificate of Compliance and Transportation Authority* is hereby **APPROVED** as to each of the above-referenced dockets, subject to the provisions of TEX. NAT. RES. CODE §§ 91.1041, 91.1042, 91.107, 91.114, 91.142 and TEX. ADMIN. CODE § 3.15, 3.58, and 3.78. If after 90 days after the order becomes final, MEB, LLC has not met the requirements of the listed provisions, this Order shall be **VOID** and each subject Form P-4 shall be marked as *Unable to Process* and archived.

It is further **ORDERED** by the Commission that this order shall not be final and effective until 25 days after the Commission's order is signed, unless the time for filing a motion for rehearing has been extended under TEX. GOV'T CODE § 2001.142, by agreement under TEX. GOV'T CODE § 2001.147, or by written Commission Order issued pursuant to TEX. GOV'T CODE § 2001.146(e). If a timely motion for rehearing of an application is filed by any party at interest, this order shall not become final and effective until such motion is overruled, or if such motion is granted, this order shall be subject to further action by the Commission. Pursuant to TEX. GOV'T CODE § 2001.146(e), the time allotted for Commission action on a motion for rehearing in this case prior to its being overruled by operation of law is hereby extended until 100 days from the date Commission Order is signed. All pending motions and requests for relief not previously or herein granted are denied.

Done this 11th day of September 2019, Austin, Texas.

Railroad Commission of Texas (Order approved and signatures affixed by Hearings Division Unprotested Master Order dated September 11, 2019)