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

APPLICATION OF BTA OIL PRODUCERS, LLC TO RESCIND APPROVAL OF FOUR APPLICATIONS FOR PERMITS TO DRILL ISSUED TO TEXAS STANDARD OPERATING NM LLC, LEA COUNTY, NEW MEXICO.

CASE NO. 23426

BTA OIL PRODUCERS, LLC'S EMERGENCY MOTION TO SUSPEND PRE-HEARING ORDER AND FOR STATUS CONFERENCE

BTA Oil Producers, LLC ("BTA" or "Applicant") requests that the New Mexico Oil Conservation Division ("Division") issue an order: (1) suspending the April 6, 2023 prehearing order that set this case for hearing on May 18, 2023; and (2) converting the May 18, 2023 hearing to a status conference to allow the parties to select a new hearing date. In support of this motion, BTA states the following.

- 1. On April 6, 2023, the Division issued a pre-hearing order that set this case for hearing on May 18, 2023.
- 2. On May 11, 2023, Texas Standard Operating NM, LLC ("Texas Standard") filed a motion requesting that the Division extend the deadline for the parties to submit testimony and exhibits until May 12, 2023. That motion was granted on May 12, 2023, and the parties timely filed their testimony and exhibits.
- 3. Undersigned counsel for BTA learned on May 15, 2023 that she must travel out of state on May 16-19, 2023 due to an urgent family medical situation. As a result, BTA respectfully requests that the Division suspend the prehearing order and convert the May 18, 2023 hearing to a status conference.

4. Counsel for Texas Standard was contacted regarding this motion and does not oppose BTA's request.

For the foregoing reasons, BTA requests that the Division issue an order: (1) suspending the April 6, 2023 prehearing order that set this case for hearing on May 18, 2023; and (2) converting the May 18, 2023 hearing to a status conference

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn McLean Yarithza Peña P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
ypena@hinklelawfirm.com

Counsel for BTA Oil Producers, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2023, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com
Attorney for Texas Standard Operating NM LLC

/s/ Dana S. Hardy

Dana S. Hardy