

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

**APPLICATIONS OF FED OPERATING,  
LLC FOR APPROVAL OF A NON-STANDARD  
HORIZONTAL WELL SPACING UNIT  
AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 26131-26132**

**MOTION FOR CONTINUANCE AND OPPOSITION TO PRESENTATION  
OF AFFIDAVIT CASE**

Hunt Cimarron Limited Partnership (“Hunt Cimarron”), by and through undersigned counsel of record, moves for a continuance of the captioned cases, and as grounds therefor, states:

1. Hunt Cimarron is a working interest owner in the proposed spacing units of the captioned cases.
2. Hunt Cimarron has not received notice of hearing from the Applicant of the captioned cases.
3. The rules and regulations and policy of the Oil Conservation Division require that at least twenty days of notice be given by the Applicant to parties who are being force-pooled.
4. Undersigned counsel has conferred with counsel for Applicant concerning this motion, and Applicant opposes continuation of these cases.
5. Opposition to Presentment of Case by Affidavit. Hunt Cimarron opposes presentment of these cases by Affidavit and requests that this case be set on the Division’s contested case docket in August or September, 2026 for regular hearing.

WHEREFORE, Hunt Cimarron requests that:

- A. The captioned cases be continued until Applicant will have complied with the Division's hearing notice requirements.
- B. That these cases be set on the Division's contested hearing dockets following notice to Hunt Cimarron.
- C. For such other relief as the Division deems appropriate.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of this Entry of Appearance to be served through electronic mail on this 23<sup>rd</sup> day of June, 2026 upon:

Kaitlyn A. Luck  
Dana S. Hardy  
Jaclyn M. McLean  
Yarithza Peña

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/s/ Ernest L. Padilla  
Ernest L. Padilla