

MONTGOMERY & ANDREWS LAW FIRM

J. SCOTT HALL Cell: (505) 670-7362 Email: shall@montand.com www.montand.com

July 29, 2016

HAND-DELIVERY

Florene Davidson New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Re: Application of Nearburg Exploration Company, L.L.C., SRO2 LLC, and SRO3 LLC, Case No. 15441

Dear Ms. Davidson:

Enclosed please find for filing the original and one copy of an Application for Hearing De Novo before the Oil Conservation Commission regarding the above matter.

Thank you.

Very truly yours,

Drim M. Luna

Diana M. Luna Assistant to J. Scott Hall

Enclosure cc (via email, w/enc.):

 Michael H. Feldewert, Esq. and Jordan L. Kessler, Esq. Nearburg Exploration Co.
Scotty Holloman, Esq., Maddox, Holloman & Moran PC David Harper, Esq., Haynes & Boone

REPLY TO: 325 Paseo de Peralta Santa Fe, New Mexico 87501 Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307 Santa Fe, New Mexico 87504-2307

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

IN THE MATTER OF THE APPLICATION OF NEARBURG EXPLORATION COMPANY, L.L.C., SRO2 LLC AND SRO3 LLC FOR AN ACCOUNTING AND LIMITATION ON RECOVERY OF WELL COSTS, AND FOR CANCELLATION OF APPLICATION FOR PERMIT TO DRILL, EDDY COUNTY, NEW MEXICO

CASE NO. 15441

APPLICATION FOR HEARING DE NOVO

Nearburg Exploration Company, L.L.C., SRO2 LLC and SRO3 LLC pursuant to NMSA 1978

Section 70-2-13, requests the above-referenced matter be set for hearing de novo before the New Mexico

Oil Conservation Commission on December 6, 2016.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

1. Sich you By:_

J. Scott Hall Sharon T. Shaheen P.O. Box 2307 Santa Fe, New Mexico 87504-2307 Telephone: (505) 982-3873 shall@montand.com sshaheen@montand.com

Scotty Holloman <u>sholloman@hobbsnmlaw.com</u> MADDOX, HOLLOMAN& MORAN Box 2508 Hobbs, New Mexico 88241 Telephone: (575) 393-0505 David H. Harper Aimee M. Furness Sally L. Dahlstrom david.harper@haynesboone.com aimee.furness@haynesboone.com sally.dahlstrom@haynesboone.com HAYNES AND BOONE, LLP *Pro Hac* 2323 Victory Avenue, Suite 700 Dallas, Texas 75219 Telephone: (214) 651-5000 Facsimile: (214) 651-5940

ATTORNEYS FOR NEARBURG EXPLORATION COMPANY, L.L.C., SRO2 LLC and SRO3 LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on July 29, 2016:

Michael H. Feldewert Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, NM 87504-2208 mfeldewert@hollandhart.com jlkessler@hollandhart.com

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J. Scott Hall