

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

**APPLICATION TO AMEND REFERENCE
CASE ORDER R-12865 TO INCLUDE THE
PICTURED CLIFFS AND FRUITLAND
COAL GAS POOLS FOR PRE-APPROVAL
OF DOWNHOLE COMMINGLING AS TO
ALL CRITERIA FOR ITS SAN JUAN 28-4
UNIT AND TO ELIMINATE THE NOTICE
REQUIREMENT, RIO ARriba COUNTY,
NEW MEXICO.**

**CASE NO. 13987 (re-opened)
ORDER NO. R-12865**

UNOPPOSED MOTION FOR CONTINUANCE

Hilcorp Energy Company respectfully requests the Division continue the above-referenced case from October 17, 2019 to **January 23, 2020**. Hilcorp presented this case at hearing on September 19, 2019 but continued it to October 17, 2019 so it could confirm all parties entitled to notice were notified of the hearing. Since that time, Hilcorp has been diligently reviewing ownership records. As a result of that investigation, Hilcorp identified additional parties entitled to notice; however, the parties were identified after the deadline to file a continuance. *See* 19.15.4.13(C) NMAC (late motions for continuance may be filed if the reason for the continuance arose after the deadline). No other party has entered an appearance in this case.

Respectfully submitted,

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

(505) 983-6043

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

ATTORNEYS FOR HILCORP ENERGY COMPANY