

OIL CONSERVATION DIV.

LAW OFFICES

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NOV 15 PM 4:46

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13 November 2001

FACSIMILE AND MAIL

505/476-3462

New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Attention: Florene Davidson

Re: Case No. 12771

Gentlemen:

Attached for filing is an Entry of Appearance and a Motion for Continuance.
The originals and an extra copy will be in today's mail.

If you have any questions, please let us know. Thank you.

Respectfully yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.



Sue C. Pemberton
Secretary to James E. Haas

Enclosures

xc: Mr. David K. Brooks (w/enc.)
Prairie Sun, Inc. (w/enc.)

STATE OF NEW MEXICO OIL CONSERVATION DIV.
ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION NOV 15 PM 4:47

APPLICATION OF THE NEW MEXICO OIL CONSERVATION
DIVISION, THROUGH THE SUPERVISOR OF DISTRICT II,
FOR AN ORDER REQUIRING OPERATORS TO BRING
SIXTY-TWO (62) WELLS INTO COMPLIANCE WITH RULE
201.B, AND ASSESSING APPROPRIATE CIVIL PENALTIES;
LEA, ROOSEVELT AND CHAVES COUNTIES, NEW MEXICO

CASE NO. 12771

ENTRY OF APPEARANCE

COMES NOW James E. Haas, of Losee, Carson, Haas & Carroll, P. A. and
hereby enters his appearance on behalf of PRAIRIE SUN, INC.

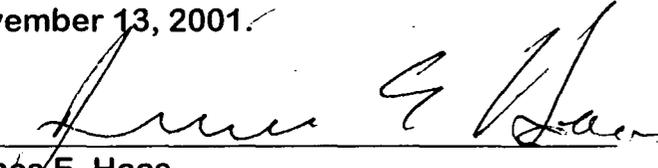
LOSEE, CARSON, HAAS & CARROLL, P. A.

By: 

James E. Haas
P.O. Box 1720
Artesia, NM 88211-1720
(505)746-3505

Attorneys for Prairie Sun, Inc.

I hereby certify that I caused a true and
correct copy of the foregoing pleading to be
FAXed and mailed to counsel of record this
November 13, 2001.


James E. Haas

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

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION
DIVISION, THROUGH THE SUPERVISOR OF DISTRICT II,
FOR AN ORDER REQUIRING OPERATORS TO BRING
SIXTY-TWO (62) WELLS INTO COMPLIANCE WITH RULE
201.B, AND ASSESSING APPROPRIATE CIVIL PENALTIES;
LEA, ROOSEVELT AND CHAVES COUNTIES, NEW MEXICO**

CASE NO. 12771

MOTION FOR CONTINUANCE

COMES NOW PRAIRIE SUN, INC. ("Prairie Sun"), by its attorneys, Losee, Carson, Haas & Carroll, P. A. (James E. Haas), and in support hereof respectfully state:

1. Prairie Sun received the notice dated October 24, 2001, from David K. Brooks, Chief Hearing Officer/Engineer setting the referenced case for a hearing on Thursday, November 15, 2001, at 8:15 a.m.

2. Prairie Sun would request a continuance of Case No. 12771 as to it for the following reasons:

A. Prairie Sun Inc.'s Gulf-McKay Federal No. 1 well listed in the Notice is a currently producing well. It was previously inactive but was placed back in a producing status in July of 2001 and sold 300+ barrels of oil in the month of August. Prairie Sun has filed OCD Form C-115 reporting this production with the Oil Conservation Division. The Gulf-McKay Federal No. 1 well remains in a producing status as of this date.

- B. The Morgan Federal No. 1 well is a Morrow gas well which is not currently producing due to lack of a pipeline connection. The pipeline abandoned the lateral into which this well was producing. Prairie bee Sun is seeking alternative pipeline connections. Additionally, Prairie Sun has been in communication with the Bureau of Land Management as to the status of this well, and the BLM remains satisfied that the well is capable of producing in commercial quantities. Prairie Sun continues to seek a new pipeline to purchase production from the Morgan Federal No. 1 well.
- C. Prairie Sun respectfully requests that continuance be granted in order that Prairie Sun would have time to present evidence supporting the assertions made above to the District Office of the Oil Conservation Division.

WHEREFORE, Applicant prays that Case No. 12771 and the hearing scheduled therefor as to Prairie Sun be continued to such other time as is convenient for both the examiner and opposing counsel, and for such other and further relief as may be just in the premises.

Respectfully submitted,

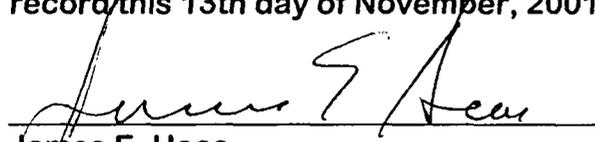
LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 

James E. Haas
P. O. Box 1720
Artesia, New Mexico 88211-1720
(505)746-3505

Attorneys for Prairie Sun, Inc.

I hereby certify that I caused to be
FAXed and mailed a true and correct
copy of the foregoing to all counsel of
record this 13th day of November, 2001.



James E. Haas