STATE OF NEW MEXICO RECEIVED OCD ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION 2016 APR 12 P 12: 49

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION COMPLIANCE AND ENFORCEMENT BUREAU FOR THE PURPOSE OF CONSIDERING:

A COMPLIANCE ORDER AGAINST SIANA OPERATING, LLC FOR WELLS OPERATED IN LEA COUNTY, NEW MEXICO

CASE NO. 15475

SIANA OPERATIING, LLC OPPOSED MOTION FOR A CONTINUANCE

COMES NOW Robert A. Stranahan IV, counsel for Siana Operating, LLC (hereinafter "Siana"), and moves for a continuance of the hearing currently scheduled in this matter to begin on April 14, 2016 in Santa Fe, New Mexico. This motion is prompted by the fact that counsel for Siana was only recently engaged in this matter and needs time to review the allegations asserted against Siana, determine the veracity of these claims and investigate the progress and current status of compliance. Going forward with the hearing at this time would irrevocably harm Siana and a brief delay will not affect any of the parties in this matter. Siana has agreed to remain in "shut in" status and will continue to diligently work towards resolving the underlying issues. Finally, Siana is currently working on a settlement agreement with the Department and would like the

additional time to reach an agreement, which would negate the necessity of further proceedings.

WHEREFORE, Siana respectfully requests that the Hearing Officer continue the hearing on the Compliance Order until the next available hearing date. Counsel for Siana has consulted with counsel for all parties and both counsel for the Energy, Minerals and Natural Resources Department and counsel for the State Land Office oppose this motion.

Respectfully submitted on this 12th day of April, 2016,

Robert A. Stranahan IV

The Stranahan Firm, LLC

1314 Madrid Road

Santa Fe, New Mexico 87505

Phone: (505) 577-0729 rstranahan1@me.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing OPPOSED MOTION FOR A CONTINUANCE was sent electronically to the following parties on the 12th day of April 12, 2016.

Keith W. Herman Energy, Minerals and Natural Resources Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 Keith.Hermann@state.nm.us

Michelle Miano
Associate Counsel
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, New Mexico 87504-1148

Phone: (505) 827-5702 Fax: (505) 827-4262 mmiano@slo.state.nm.us

Robert A. Stranahan IV