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# CARSON RYAN LLC

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September 23, 2016

**Via Federal Express**  
**& Fax (505)476-3462**

Mr. David R. Catanach  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

RECEIVED  
2016 SEP 27 PM 3:05

**Re: Case Nos. 15510 and 15511: Application of Mewbourne Oil Company for a Non-Standard Spacing and Proration Unit, Compulsory Pooling, and an Unorthodox Gas Well Location, Eddy County, New Mexico.**

Dear Mr. Catanach:

We represent Manuela Franco. We are currently in negotiations with the Applicant in the above referenced cases. The Applicant has agreed to our request for continuance. To that end, please find enclosed our Entry of Appearance and Unopposed Motion for Continuance in these matters.

Your attention in this regard is appreciated.

Very truly yours,

CARSON RYAN LLC



Elizabeth A. Shields,  
Attorney

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

2015 SEP 27 P 3:11

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR A NON-STANDARD SPACING AND PRORATION  
UNIT, COMPULSORY POOLING, AND AN  
UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

Case No. 15510

Case No. 15511

ENTRY OF APPEARANCE

Manuela Franco, by and through her undersigned attorneys, Carson Ryan LLC, (Joel M. Carson III and Elizabeth A. Shields), hereby enters its appearance in the above matter.

Respectfully submitted,

CARSON RYAN LLC

By: 

Joel M. Carson III  
Elizabeth A. Shields  
P.O. Box 1612  
Roswell, New Mexico 88201  
(575) 291-7606  
[joel@carsonryan.com](mailto:joel@carsonryan.com)  
[elizabeth@carsonryan.com](mailto:elizabeth@carsonryan.com)

*Attorneys for Manuela Franco*

*Certificate of Service*

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 23<sup>rd</sup> day of September 2016.

James Bruce  
Attorney at Law  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)



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Elizabeth A. Shields

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

RECEIVED  
2015 SEP 27 P 2:11

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR A NON-STANDARD SPACING AND PRORATION  
UNIT, COMPULSORY POOLING, AND AN  
UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

Case No. 15510

Case No. 15511

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW, Manuela Franco, by and through her undersigned attorneys, Carson Ryan LLC, (Joel M. Carson III and Elizabeth A. Shields), and respectfully moves for a continuance of Case No. 15510 and No. 15511. Applicant Mewbourne Oil Company has consented to our motion.

Respectfully submitted,

CARSON RYAN LLC

By: A. Shields

Joel M. Carson III  
Elizabeth A. Shields  
P.O. Box 1612  
Roswell, New Mexico 88201  
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[elizabeth@carsonryan.com](mailto:elizabeth@carsonryan.com)

*Attorneys for Manuela Franco*

*Certificate of Service*

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James Bruce  
Attorney at Law  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

A handwritten signature in cursive script, appearing to read "Elizabeth A. Shields", written in black ink on a white background.

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Elizabeth A. Shields