

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION, THROUGH THE ENFORCEMENT AND COMPLIANCE MANAGER, FOR A COMPLIANCE ORDER AGAINST C & D MANAGEMENT COMPANY D/B/A FREEDOM VENTURES COMPANY, FINDING THAT THE OPERATOR KNOWINGLY AND WILLFULLY VIOLATED 19.15.13.1115 NMAC AND KNOWINGLY AND WILLFULLY VIOLATED 19.15.4.201 NMAC; ASSESSING PENALTIES; REQUIRING OPERATOR TO BRING SAID WELLS INTO COMPLIANCE WITH 19.15.13.1115 NMAC AND 19.15.4.201 NMAC BY A DATE CERTAIN; AND IN THE EVENT OF NON-COMPLIANCE, DECLARING THE WELLS ABANDONED AND AUTHORIZING THE DIVISION TO PLUG THE WELLS AND FORFEIT THE APPLICABLE FINANCIAL ASSURANCE, EDDY COUNTY, NEW MEXICO.

**CASE NO. 14055
ORDER NO. R-12913**

REQUEST FOR DE NOVO HEARING


C & D Management Company d/b/a Freedom Ventures Company by and through its undersigned counsel of record, hereby requests a De Novo Hearing before the New Mexico Oil Conservation Commission from the Order of the Division entered on 3rd day of March, 2008.

RECEIVED

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PADILLA LAW FIRM P.A.

By:



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for De Novo Hearing was hand-delivered to Sonny Swazo, Esq., Assistant General Counsel, New Mexico Oil Conservation Division, 1220 S. St. Francis Drive, Santa Fe, New Mexico 87505, this 31st day of March, 2008..



ERNEST L. PADILLA