

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

UNOPPOSED MOTION FOR CONTINUANCE

C & D Management Company D/B/A Freedom Ventures Company by its undersigned attorney moves the Commission for a continuance of the hearing in the above-captioned matter and as grounds therefore states:

1. Because of the additional issues presented by the Commission's decision to increase the scope of the original petition in this case, undersigned counsel requires additional time to conduct further independent discovery. Additionally, undersigned counsel needs to travel on September 9, 2009 to Denver, Colorado to attend a Rocky Mountain Mineral Foundation seminar scheduled for September 10 and 11, 2009.

2. Counsel for the New Mexico Oil Conservation Division Sonny Swazo does not oppose this motion.

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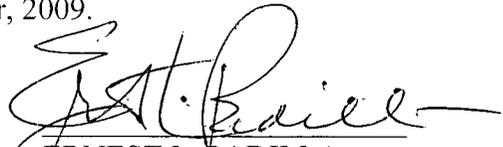
WHEREFORE, for the foregoing reasons C & D Management Company D/B/A Freedom Ventures Company requests a continuance of one month from September 9, 2009 to the Commission's next regularly scheduled hearing docket.

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 Motion for Continuance was sent by facsimile (505) 476-3462 to Sonny Swazo, Esq., Assistant General Counsel, New Mexico Oil Conservation Division, 1220 S. St. Francis Drive, Santa Fe, New Mexico 87505, this 16 day of September, 2009.

  
ERNEST L. PADILLA