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& SHERIDAN, P.A.  
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September 4, 1996

**VIA HAND DELIVERY**

William J. LeMay, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

RECEIVED

SEP 4 1996

Oil Conservation Division

*WJL*

Re: Case No. 11606 -- Application of Naumann Oil & Gas, Inc. for compulsory pooling, Eddy County, New Mexico

Dear Mr. LeMay:

Naumann Oil & Gas, Inc. consents to the continuance of Oil Conservation Division case number 11606, application of Naumann Oil & Gas, Inc. for compulsory pooling in and under the S/2 of Section, 33, Township 17 South, Range 30 East, N.M.P.M. Eddy County, New Mexico, to the September 26, 1996 examiner hearings.

Thank you for your consideration.

Very truly yours,

*Tanya M. Trujillo*

Tanya M. Trujillo

cc: Patrick Tower  
Tom Kellahin

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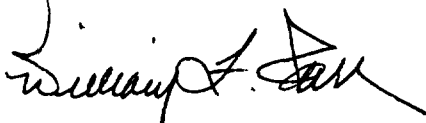
Re: Oil Conservation Division Case No. 11606:  
Application of Naumann Oil & Gas, Inc., for Compulsory Pooling, Eddy  
County, New Mexico

Dear Mr. LeMay:

Naumann Oil & Gas, Inc., applicant in the above-captioned case, respectfully requests that this matter which is currently set on the Division docket for the September 5, 1996 hearings be continued to the September 26, 1996 Examiner docket.

Your attention to this matter is appreciated.

Very truly yours,



WILLIAM F. CARR  
WFC:mlh

cc: Mr. David Frye

**KELLAHIN AND KELLAHIN**

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

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W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
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JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285  
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August 30, 1996

**VIA FACSIMILE**  
**(505) 827-8177**

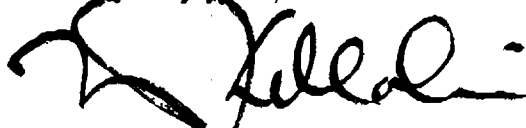
Mr. David R. Catanach  
Hearing Examiner  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505

**Re: MOTION FOR CONTINUANCE**  
**NMOCD Case 11606**

Dear Mr. Catanach:

On behalf of Anadarko Petroleum Corporation, I am requesting that the referenced case be continued from the Examiner's docket now set for September 5, 1996 to the Examiner docket schedule for September 26, 1996.

Very truly yours,



W. Thomas Kellahin

cfx: William F. Carr, Esq.  
Attorney for Applicant  
cfx: Anadarko Petroleum Corporation  
Attn: Patrick Smith

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

**IN THE MATTER OF THE APPLICATION OF  
NAUMANN OIL & GAS, INC.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NO: 11606**

**MOTION FOR CONTINUANCE**

Comes now ANADARKO PETROLEUM CORPORATION by its attorneys, KELLAHIN & KELLAHIN, and applies to the New Mexico Oil Conservation Division for a continuance of the referenced case from the Examiner's docket now set for September 5, 1996 to the Examiner's docket now set for September 26, 1986 and in support states:

(1) Anadarko Petroleum Corporation ("Anadarko") has a 40.625 % working interest ownership in the oil and gas minerals in the S/2 of Section 33.

(2) The other working interest owners in the S/2 of Section 33 are:

Phillips Petroleum Company	50 % WI
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Logro Corporation, et al	9.375 % WI
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(2) On August 2, 1996, Anadarko received a letter dated July 30, 1996, in which Logro Corporation ("Logro") proposed to Anadarko a Morrow well at a cost of \$981,850.00 to be located 2,100 FWL and 1650 feet FSL in Section 33 to be dedicated to the S/2 of Section 33.

NMOCD Case 11606  
Anadarko Petroleum Corporation  
Motion for Continuance  
Page 2

(3) In response, on August 5, 1996, Anadarko proposed to Logro Corporation that Anadarko would operate and would drill the subject well for approximately \$100,000.00 less than Logro's proposal.

(4) On August 13, 1996, less than 11 days after proposing a well, Logro caused Naumann Oil & Gas, Inc. ("Naumann") to file a compulsory pooling application against Anadarko which is currently set for hearing on September 5, 1996.

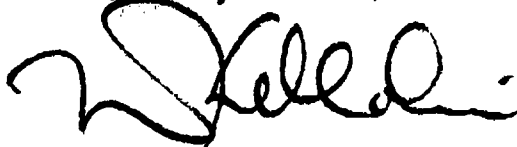
(5) Logro with only 9.375% of the working interest has instituted compulsory pooling instead of engaging in good faith negotiations with Anadarko concerning this well.

(6) In order to allow both Naumann and Logro an opportunity to comply with Section 70-2-17(c) NMSA (1978), Anadarko requests that this case be continued so that the parties owning in excess of 90% of the working interest in this spacing unit will have a fair and reasonable opportunity to consider reaching an agreement with Naumann on a voluntary basis.

(7) Counsel for Naumann has been asked to concur in this motion but has not yet declared whether Naumann will voluntarily agree to a continuance.

WHEREFORE, Movant prays that the hearing of this case be continued.

Respectfully submitted,



W. Thomas Kellahin  
Kellahin & Kellahin  
P. O. Box 2265  
Santa Fe, New Mexico 87504-2265  
(505) 982-4285