## HANRATTY LAW FIRM

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Practice Presently Limited to Trials Including 'Vrougful Death & Injuries

### FAX COVER SHEET

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# Hanratty Law Firm

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402 East Main P.O. Box 1330 Artesia, NM 88211-1330

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Practice Primarily Limited to Trials Including Wrongful Death & Injuries

Kevin J. Hanratty
— Member —
New Mexico, Louisiana
and Michigan Bars

May 6, 1998

Via Facsimile (505) 827-1389

Mr. Rand Carroll, Esq. LEGAL COUNSEL FOR N.M. OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, NM 87505

Re: OCD No. 11811

Examiner Hearing of May 14, 1998

Dear Mr. Carroll:

Enclosed herewith please find a copy of our Motion for Application Hearing Continuance.

Following your review of this Motion, please contact my office with your concurrence or opposition of same.

Your prompt attention to this matter is greatly appreciated.

Very truly yours,

Kevin J. Hanratty

KJH/smb

pc: File

Enclosures as indicated

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

APPLICATION OF THE NEW MONTH OF MEDICAL COMMON DIVISION THROUGH THE SUPERVISOR OF DISTRICT II FOR AN ORDER REQUIRING HANSON ENERGY TO PROPERLY PLUG SEVENTEEN WELLS LOCATED IN TOWNSHIP 18 SOUTH, RANGE 28 EAST, AND TOWNSHIPS 17 SOUTH, RANGES 27 AND 28 EAST, EDDY COUNTY, NEW MEXICO, AUTHORIZING THE DIVISION TO PLUG SAID WELLS, AND ORDERING A FORFEITURE OF THE PLUGGING BOND.

CASE NO. 11811

#### MOTION FOR APPLICATION HEARING CONTINUANCE

HANSON ENERGY, by and through their attorney of record, Kevin J. Hanratty of the HANRATTY LAW FIRM, states:

- 1. The Application of the Oil Conservation Division for an Order requiring Hanson Energy to plug seventeen (17) wells in Eddy County, New Mexico, is set for an examiner hearing on May 14, 1998 (Docket No. 13-98).
  - 2. The undersigned received notice of said hearing on May 4, 1998.
- 3. The undersigned will be attending a seminar entitled Failure to Diagnose Breast Cancer in New York City May 13-15, 1998, (See Exhibit A attached hereto) and is committed to same due to nonrefundable airline tickets and hotel reservations.
- 4. For the aforementioned reasons, the undersigned requests the hearing presently set for May 14, 1998, be continued to a later date as so the undersigned may be present at same.

5. Rand Carroll, Legal Counsel for the New Mexico Oil Conservation Division, has been contacted and concurs with / opposes this Motion.

WHEREFORE it is prayed this Honorable Court grant the relief requested.

Respectfully submitted:

**HANRATTY LAW FIRM** 

BY:\_\_\_\_

Kevin J. Hanrardy P.O. Box 1330

Artesia, NM 88211-1330

(505) 748-1329

Attorney for Hanson Energy

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading was mailed to opposing counsel of record this \_\_\_\_\_ day of May, 1998.

Kevin J. Hanratty

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