

**JAMES BRUCE**

ATTORNEY AT LAW

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July 10, 2000

Via Fax and U.S. Mail

Lori Wrotenbery  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

Re: Case No. 12414 (Nearburg Exploration Company, L.L.C.)

Dear Ms. Wrotenbery:

Enclosed for filing is a motion for continuance in the above case.

Very truly yours,



James Bruce

Attorney for Pogo Producing Company

cc: William F. Carr w/encl. (via fax)

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF NEARBURG EXPLORATION  
COMPANY, L.L.C. FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

Case No. 12414

MOTION FOR CONTINUANCE

Pogo Producing Company ("Pogo") moves the Division for an order continuing the above case for two weeks, and in support thereof, states:

1. The chronology of this case is as follows:

(a) The original application in this matter was filed on May 9, 2000, for a well located 990 feet from the north and west lines of Section 32, Township 15 South, Range 32 East, NMPM. The hearing was set for June 1, 2000.

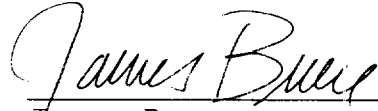
(b) The well location was subsequently moved by applicant to a location 1650 feet from the north line and 1330 feet from the west line of Section 32. See Exhibit A. As a result, the hearing was continued.

(c) The well location was moved again to a location 1650 feet from the north and west lines of Section 32, and the hearing was continued again, to July 13, 2000.

2. To apply for the final location (1650 feet from the north and west lines of Section 32), an amended application had to be filed with the Division no later than June 20, 2000. However, Pogo did not receive notice of the new location until June 22, 2000. See Exhibit B. As a result, there was insufficient notice of the new location prior to the filing of the amended application, and the hearing should be continued.

**WHEREFORE**, Pogo requests that the above case be continued for two weeks.

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Pogo Producing Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent via facsimile transmission this 10<sup>th</sup> day of July, 2000 to:

William F. Carr  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 983-6043



James Bruce

**Nearburg Exploration Company, L.L.C.**

Exploration and Production  
3300 North "A" Street  
Building 2, Suite 100  
Midland, Texas 79706  
915/838.8239  
Fax 915/800-7000

**RECEIVED**

**May - 2 2000**

**MIDLAND**

**ILLEGIBLE**

May 31, 2000

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Pogo Producing Company  
P. O. Box 10340  
Midland, Texas 79702-7340

ATTN: Terry Gani

Re: Anderson Ranch "32" State Com. #1 Well  
1,650' FNL and 1,330' FWL  
W/2 of Section 32, T-15-S, R-12-E  
Lea County, New Mexico  
Anderson Ranch 32 Prospect

Gentlemen:

Enclosed herewith, please find an amended AFE setting forth the captioned location, which has been moved after further geologic review of potential shallow formations. The estimated costs and expenses to drill and complete the proposed well are unchanged.

Should you wish to participate in the drilling of this well, please execute both copies of the AFE and return one copy to the undersigned. Should you elect not to participate we ask that you consider granting Nearburg Exploration Company, L.L.C. a term assignment or farmout of your interest on reasonable terms. We will provide amendments to the Joint Operating Agreement which properly describes the amended location should you elect to participate in the drilling of this well.

If we can be of further assistance, please feel free to contact the undersigned.

Yours very truly,



Duke Roush  
Senior Landman

DH/dw  
encl

**"A"**

Nearburg Exploration Company, L.L.C.

Exploration and Production  
3300 North "A" Street  
Building 2, Suite 120  
Midland, Texas 79705  
915/686-8235  
Fax 915/686-7806

RECEIVED

JUN 22 2000

MIDLAND

ILLEGIBLE

June 21, 2000

Pogo Producing Company  
P. O. Box 10340  
Midland, Texas 79702-7340

ATTN: Terry Gant

Pluma Prospect

Re: Anderson Ranch "32" State Com. #1  
1,650' FNL and 1,650' FWL  
W/2 of Section 32, T-15-S, R-32-E  
Lea County, New Mexico  
Anderson Ranch 32 Prospect

Gentlemen

Nearburg Exploration Company, L.L.C. (NEC) recently sent an AFE to you proposing the Anderson Ranch "32" State Com. #1 well at a location of 1,650' FNL and 1,330' FWL. After further review, it became apparent that the well would be at an unorthodox location if the well was completed in a formation spaced on 40 or 80 acre proration units. We therefore, have moved the location to the captioned footage to avoid being unorthodox. The AFE previously provided contains NEC's estimated costs to drill and complete the well and remains unchanged with the exception of the location.

We are in the process of amending the pooling application and will send same to you upon receipt.

If we can be of further assistance, please feel free to contact the undersigned.

Yours very truly,



Duke Roush  
Senior Landman

DR/dw

"B"

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.  
LAWYERS

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WILLIAM F. CARR  
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POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
FACSIMILE: (505) 983-6043  
E-MAIL: law@westofpecos.com

June 9, 2000

**VIA HAND DELIVERY**

Lori Wrotenbery, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
2040 South Pacheco Street  
Santa Fe, NM 87505



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JUL 06 2000 PM 12:42

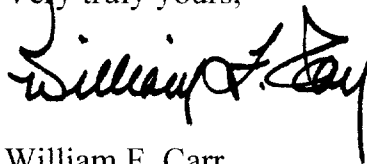
***RE: In the matter of Case 12414: The Application of Nearburg Exploration Company, L.L.C. for compulsory pooling, Lea County, New Mexico.***

Dear Ms. Wrotenbery,

Nearburg Producing Company hereby requests that the Examiner Hearings in the above-referenced cases which are currently scheduled for June 15<sup>th</sup>, 2000 be continued to the July 13<sup>th</sup>, 2000 Examiner hearing docket.

Your attention to this request is appreciated.

Very truly yours,



William F. Carr

WFC:md

cc: Duke Roush - Nearburg Exploration  
James Bruce, Esq.