

# Correspondence

*Denovo Case*

Case No. 12622

June - July 2002

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

IN THE MATTER OF THE APPLICATION  
OF NEARBURG EXPLORATION COMPANY,  
L.L.C. FOR TWO NON-STANDARD GAS  
SPACING AND PRORATION UNITS,  
LEA COUNTY, NEW MEXICO.

CASE NO. 12,622 (De Novo)

**MOTION FOR CONTINUANCE**

Raptor Natural Pipeline, LLC, ("Raptor"), a party of record in this proceeding and through its counsel, moves the Commission continue the hearing now set for July 19, 2002 to the Commission's hearing docket scheduled for August 30, 2002.

As grounds for this motion, Raptor states that counsel has a previously scheduled out-of-town proceeding that prevents his attendance at the July 19<sup>th</sup> Commission hearing.

Counsel for the De Novo Applicant, Nearburg Exploration Company, LLC, has stated concurrence with this motion.

MILLER, STRATVERT & TORGERSON, P.A.

By: \_\_\_\_\_

*J. Scott Hall*  
J. Scott Hall  
Attorneys for Raptor Natural Pipeline LLC  
Post Office Box 1986  
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**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the 7 day of July, 2002, as follows:

Steve Ross, Esq.  
New Mexico Oil Conservation Commission  
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Attorneys for Redrock Operating Ltd. Company



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J. Scott Hall

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PLEASE REPLY TO SANTA FE

- \* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
- \*\* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

June 26, 2002

**VIA FACSIMILE**

Thomas Kellahin, Esq.  
Post Office Box 2265  
Santa Fe, New Mexico 87504

William F. Carr, Esq.  
Post Office Box 2208  
Santa Fe, New Mexico 87504

Re: NMOCC Case No. 12622; Application of Nearburg Exploration Company, LLC for Two Non-Standard Gas Spacing Units, Lea County, New Mexico; (De Novo)

Dear Counsel:

Due to a previously scheduled proceeding in Farmington, I cannot attend the July 19<sup>th</sup> Commission hearing on the above application. Accordingly, I will file a motion to continue the hearing to the Commission's August 30, 2002 hearing docket. Will you concur?

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

J. Scott Hall

JSH/glb

cc: Darren Groce, Esq.  
Steve Ross, Esq.

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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Betty Rivera**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 24, 2002

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J. Scott Hall, Esq.  
Miller, Stratvert & Torgerson, P.A.  
P.O. Box 1986  
Santa Fe, New Mexico 87504-1986

Re: Case No. 12622, Application of Nearburg Exploration Company L.L.C. for two non-standard gas spacing units, Lea County, New Mexico, *de novo*

Dear Counsel,

The Commission members have requested that copies of each exhibit that is to be offered during the hearing of this matter be provided to the Commission Secretary no later than one week prior to the date set for hearing. As the hearing is now set for July 19, exhibits should be submitted to Florene Davidson no later than Friday, July 12. If an agreed continuance results in the matter being set in a subsequent month, exhibits should be submitted no later than one week prior to the re-scheduled hearing.

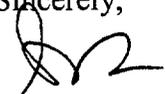
It would also helpful if you could provide a more detailed statement of your positions in the pre-hearing statement than is customary.

Please be advised that the July 19 docket is full. Depending on where the case appears on the docket, you should be prepared for a long day. If any party intends to request a continuance, we would appreciate being alerted to this fact as soon as possible.

Counsel  
June 24, 2002  
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The Commission members believe that review of detailed pre-hearing statements and the documentary evidence to be offered will help them to be better prepared for the issues and testimony. As always, if you have any questions, please do not hesitate to give me a call at 476-3451.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Ross', written over the word 'Sincerely,'.

Stephen C. Ross  
Assistant General Counsel

Cc: Florene Davidson, Commission Secretary