

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

**APPLICATION OF NORDSTRAND ENGINEERING,  
INC. TO REMOVE NORTHERN PACIFIC OIL AND  
GAS, INC. AS OPERATOR OF RECORD FOR THE  
BULL MOOSE 2 STATE COM #001H WELL  
ROOSEVELT COUNTY, NEW MEXICO**

**Case No. 23551**

**NORDSTRAND ENGINEERING INC'S RESPONSE TO  
NORTHERN PACIFIC'S REQUEST FOR CONTINUANCE**

Nordstrand Engineering, Inc. ("Nordstrand") hereby responds to the request for continuance filed July 4, 2023 by Northern Pacific Oil and Gas, Inc. ("Northern Pacific").

By letter of April 10, 2023, Northern Pacific was informed that Nordstrand would be filing the above-referenced application if Northern Pacific did not cooperate in seeking approval of a change in operator to allow Nordstrand to plug the well and reclaim the State lease as demanded by the State Land Office. Northern Pacific's CEO, Santiago Garcia, received notice of the application no later than May 22, 2023. At the request of Northern Pacific, Nordstrand agreed to continue this matter from the June 1, 2023 docket to the July 6, 2023 docket. The State Land Office did not oppose the motion at that time, on the condition that it would be the only continuance in this matter sought by Nordstrand.

Northern Pacific has had almost three months to locate counsel. Moreover, as the CEO of Northern Pacific, Santiago Garcia may represent Northern Pacific in this matter, pursuant to 19.15.4.14(C) NMAC. *Id.* ("Corporations . . . may appear only through an attorney or through a duly authorized officer or member."). For these reasons, Nordstrand stands ready to proceed by hearing on July 6, 2023.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

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*Attorney for Nordstrand Engineering, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following  
by electronic mail on July 5, 2023:

Northern Pacific Oil and Gas Inc.  
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*Counsel for Stephanie Garcia Richard, Commissioner  
of Public Lands of the State of New Mexico, and  
New Mexico State Land Office*

/s/ Sharon T. Shaheen

Sharon T. Shaheen