

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

**IN RE CROSS BORDER RESOURCES, INC.**

**Case No. 22224**

**OPPOSED MOTION FOR CONTINUANCE**

Cross Border Resources, Inc., by and through its undersigned attorney, moves the Division for a continuance of the above captioned matter from December 1, 2021 to the Division's next scheduled docket. As grounds for this motion, Cross Border Resources, Inc. states:

1. Undersigned counsel was retained on late Wednesday, November 24, 2021 by Cross Border Resources, Inc.
2. Because of the Thanksgiving holiday and the closure of State of New Mexico government throughout the Thanksgiving holiday, undersigned counsel was unable to enter an appearance in this case until November 29, 2001, or to file a prehearing statement.
3. From the time that undersigned counsel was retained by Cross Borders Resources, Inc., undersigned counsel has been unable to inform himself as to the factual and legal issues involved in this case.
4. Undersigned counsel has sought the concurrence of counsel for the Division for this motion and such concurrence has been denied.
5. Upon information and belief, there are no eminent environmental or other critical reasons why concurrence for this motion should not be granted. It appears that the sole reason for the Division's action is that Cross Border Resources is out of compliance with bonding requirements and inactive wells.
6. The Division would not be prejudiced should this motion be granted.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2021, I served a copy of the foregoing pleading to the following counsel of record via electronic mail:

Jesse K. Termaine     [JesseK.Termaine@state.nm.us](mailto:JesseK.Termaine@state.nm.us)

/s/ Ernest L. Padilla

Ernest L. Padilla