

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

IN RE PETRO MEX LLC

CASE NO. 22817

RESPONSE TO NOTICE OF VIOLATION, REQUEST FOR A HEARING AND FOR AN  
OBJECTION TO AND FOR A CONTINUANCE OF THE JUNE 16, 2022 HEARING

COMES NOW, the Domenici Law Firm, P. C., (Pete V. Domenici, Jr. Esq., and Joseph M. Tapia, Jr., Esq. and hereby responds to the notice of violation, objects to the June 16, 2022 as a date for the proposed hearing and for a continuance of the hearing until the parties have an opportunity to confer on the issues, respectfully states:

MOTION FOR CONTINUANCE AND OBJECTION TO THE HEARING DATE  
OF JUNE 16, 2022

1. Counsel was retained and filed an entry of appearance in this matter on May 5, 2022.
2. Respondent objects to the hearing set on June 16, 2022, on the grounds that he was unable to respond to the initial letter from opposing counsel, due to his unavailability due to his mother 's death in Mexico, and the notice not being received.
3. Counsel has conferred with opposing counsel who agrees to a continuance of the June 16, 2022 hearing but not to vacating the hearing.
4. Counsel will acquire a grasp of the issues and continue to informally resolve the issues with opposing counsel.
5. Respondent asks for a minimum of 60 days to proceed to informally resolve the matters, prior to the hearing being set.

RESPONSE TO THE NOTICE OF VIOLATION

6. Respondent realleges the foregoing paragraphs, as though fully set out, herein.

7. Counsel is without sufficient information to admit or deny the allegations contained in paragraphs One (1), Two (2), Three (3), Four (4), and, Five, (5) so therefore denies the allegations contained, therein.

WHEREFORE, Respondent prays the commission grant a continuance of the June 16, 2022, hearing; for 60 days to informally resolve the issues and determine the viability of the wells for production; and for all other and further relief the commission deems appropriate,

Respectfully submitted,

*Electronically Filed,*

Domenici Law Firm, P.C.

/s/ Pele V. Domenici Jr.

Pete V. Domenici, Jr., Esq.

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I, Joseph M. Tapia, Jr., hereby certify that the foregoing pleading was served on all counsel of record, through the filing system and by email, this 5<sup>th</sup> day of May 2022.

/s/Joseph M Tapia Jr. Esq.

Joseph M. Tapia, Jr., Esq.