

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

**APPLICATION OF HEADINGTON ROYALTY, INC. FOR UNILATERAL CHANGE IN OPERATOR FOR THE SUNRAY STATE #2 WELL OR, IN THE ALTERNATIVE, FOR AN ORDER REQUIRING THE CURRENT OPERATOR TO PLUG AND ABANDON THE WELL**

Case No. 23213

**MOTION TO DISMISS**

Applicant Headington Royalty, Inc. (“Headington”) requests that the above-referenced application be dismissed.

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

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

Daniel B. Goldberg

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)

[dgoldberg@montand.com](mailto:dgoldberg@montand.com)

ec: [wmcginnis@montand.com](mailto:wmcginnis@montand.com)

*Attorneys for Headington Royalty, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by email upon the following on December 6, 2022:

Jesse K. Tremaine  
New Mexico Energy Minerals and Natural  
Resources Department  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
(505) 231-9812  
[jessek.tremaine@emnrd.nm.gov](mailto:jessek.tremaine@emnrd.nm.gov)

*Attorneys for New Mexico Oil Conservation Division*

Ari Biernoff  
Richard Moore  
New Mexico State Land Office  
P.O. Box 1148  
310 Old Santa Fe Trail  
Santa Fe, NM 87504  
(505) 827-5756  
[abiernoff@slo.state.nm.us](mailto:abiernoff@slo.state.nm.us)  
[rmoore@slo.state.nm.us](mailto:rmoore@slo.state.nm.us)

*Attorneys for Commissioner of Public Lands and New Mexico State Land Office*

Ernest Padilla  
Padilla Law Firm PA  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[padillalaw@qwestoffice.net](mailto:padillalaw@qwestoffice.net)

*Attorney for Northern Pacific Oil and Gas, Inc.*

/s/ Sharon T. Shaheen  
Sharon T. Shaheen