

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

**APPLICATIONS OF SPUR ENERGY  
PARTNERS LLC FOR APPROVAL OF A  
PRESSURE MAINTENANCE PROJECT,  
EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 23936-23938**

**AMENDED MOTION FOR CONTINUANCE**

Spur Energy Partners, LLC, (“Spur”) moves to continue the above-referenced cases to **October 31, 2024**, for a hearing by affidavit. As support for this request, Spur states as follows.

Spur is requesting this further continuance of these pressure maintenance cases to allow for the Division to issue orders in Case Nos. 23685 and 24042. These similar pressure maintenance cases were taken under advisement by the Division and have been pending issuance of orders since approximately September 7, 2023, and April 18, 2024, respectively.

While preparing and presenting Case Nos. 23685 and 24042, the Division provided Spur guidance on the type of information, analyses, and reviews the Division wants to see in support of these pressure maintenance projects. One requirement is to prepare a reservoir simulation. The cost to prepare a reservoir simulation is approximately \$50,000. Spur has, therefore, determined it is prudent to wait for the Division to issue orders in Case Nos. 23685 and 24042 before going to hearing in the above-captioned three pressure maintenance cases and incurring the costs of reservoir simulations and other hearing preparation costs. That way Spur will have the additional guidance of Division orders approving similar pressure maintenance projects so it can adjust and/or adapt its hearing materials to align with Division guidance. Spur expects doing so will streamline Division review of the application and hearing materials, as well.

Spur previously continued these cases for approximately three months on the understanding that Orders in Case Nos. 23685 and 24042 were expected to issue relatively soon. Spur remains hopeful Orders will be issued soon and it will be in a position to go to hearing on these pressure maintenance cases on October 31, 2024.

Dismissing these cases and requiring Spur to refile will require Spur to incur additional administrative fees to refile and re-notice the applications. In contrast, continuing these cases to October 31, 2024 will impose a modest administrative burden on the Division.

WHEREFORE, Spur respectfully requests that this motion be granted and that these cases be continued to October 31, 2024, for a hearing by self-affirmed statement.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR SPUR ENERGY PARTNERS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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