

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

**APPLICATION OF SPUR ENERGY
PARTNERS, LLC FOR COMPULSARY
POOLING, EDDY COUNTY, NEW MEXICO**

CASE NO. 21935

RESPONDENT'S MOTION FOR CONTINUANCE

Contango Oil & Gas Company, a Respondent in this matter, moves for a continuance of the June 3, 2021 hearing on the Application of Applicant Spur Energy Partners, LLC to the hearing examiner's hearing docket of July 15, 2021, and in support would show as follows:

Respondent has been in discussions regarding Applicant's Application and Respondent and Applicant have not been able to resolve underlying issues regarding Applicant's proposed operations. Applicant's proposed operations have a high likelihood of having a negative impact on Respondent's existing operations both through decreased production and possible wellbore collision.

In at least one previous instance, Applicant drilled, hydraulically fractured and completed a horizontal well which caused damage to an existing vertical wellbore owned and operated by Respondent. Respondents have spent approximately \$150,000 repairing and securing said well. Additionally, the damage to Respondent's well created a serious safety issue which requires additional examination. Finally, Respondent needs additional time to analyze the overall effects on production. It will take additional time together more data regarding subsequent production and related problems.

As Respondent has recently engaged counsel, Respondent wishes to have additional time to prepare their evidence for the hearing. Applicant opposes Respondent's requested continuance. Respondent does not believe that the requested continuance would prejudice Applicant, its request for a continuance would serve the interests of preventing waste and protecting correlative rights,

and would allow Respondent to gather the additional evidence and data that the Examiner is very likely to request regarding the merits.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

Scott. S. Morgan
Stephen D. Ingram

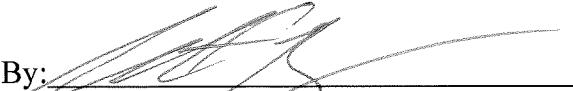
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ATTORNEY FOR CONTANGO OIL & GAS COMPANY

I hereby certify that a true and correct copy of the foregoing was served via email and U.S. mail on May 27, 2021 to the following:

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