

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

**IN RE: NOTICE OF VIOLATION ISSUED
TO G&G OIL AND GAS, LLC
OGRID #272664.**

CASE NO. 26067

MOTION TO DISMISS

G&G Oil and Gas LLC (“G&G”), through undersigned counsel, hereby request that Case No. 26067 be dismissed, as follows:

1. G&G moves to dismiss this NOV case because G&G is no longer liable for the wells at issue, pursuant to a settlement agreement with the State Land Office.
2. G&G has reached an agreement with State Land Office, in Case No. D-101-CV-2023-02716.
3. Pursuant to the agreement with the State Land Office, G&G no longer holds any interest in the wells at issue in the NOV.
4. A copy of the settlement agreement was filed with G&G’s entry in this case on April 28, 2026.
5. For these reasons, G&G requests full dismissal of the NOV.
6. OCD’s counsel’s concurrence has been requested and the OCD is **opposed** to G&G’s proposed dismissal.

Wherefore, G&G requests the Division enter an order dismissing Case No. 26067.

Respectfully submitted,
PADILLA LAW FIRM, P.A.
By: /s/ Ernest L. Padilla
Ernest L. Padilla
P.O. Box 2523
Santa Fe, NM 87504-2523
(505) 988-7577
(505) 988-7592 fax
Email: padillalawnm@outlook.com

CERTIFICATE OF SERVICE

I certify that on this 1st day of May 2026, the foregoing pleading was electronically filed with the New Mexico Oil Conservation Division Clerk and served on all parties of record through counsel as follows:

Freya Tschantz
Freya.Tschantz@emnrd.nm.gov
OCD.Hearings@emnrd.nm.gov

EMNRD-Oil Conservation Division, Law Clerk

Michael Hall
michael.hall@emnrd.nm.gov
OCD Attorney

/s/ Kaitlyn A. Luck