

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

**APPLICATION OF IMPETRO OIL & GAS, LLC
FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO**

CASE NO. 20667

IMPETRO'S UNOPPOSED MOTION FOR CONTINUANCE

ImPetro Oil & Gas, LLC ("ImPetro"), through undersigned counsel, moves for a continuance of the hearing of this case to September 19, 2019, and as grounds therefore states as follows:

1. This case was originally set for hearing on August 8, 2019. ConocoPhillips previously moved for a continuance of this case to August 22, 2019. ImPetro did not oppose that motion, and it was granted. ImPetro also moved to continue a companion case, No. 20666, so that the cases could be heard together.

2. Since then, ImPetro and ConocoPhillips have negotiated in good faith to reach an agreement regarding ImPetro's proposed development. The negotiations have progressed, but are not concluded.

3. Regarding the showing needed under 19.15.4.13.C NMAC, as this Motion is filed less than 48 hours before the scheduled hearing, as of 48 hours before the hearing, ImPetro and ConocoPhillips believed that there was a reasonable possibility that their negotiations could be concluded in time for this case to be heard on August 22. As of this morning, however, although negotiations continue in good faith, it does not appear that they can be concluded before tomorrow.

4. Allowing sufficient time for ImPetro and ConocoPhillips to reach an agreement will shorten the time needed for hearing of this matter as a contested case, thus conserving time needed for the Hearing Examiners to hear other cases on the docket.

5. No party, other than ImPetro and ConocoPhillips, has appeared in this case.

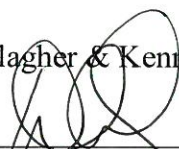
6. Counsel for ImPetro has consulted with counsel for ConocoPhillips, and ConocoPhillips concurs in this Motion. There is no opposition.

7. ImPetro has reached agreement with Advanced Energy Partners, the only other party who has appeared in Case No. 20666, and rather than request a continuance of Case No. 20666 so it can be heard together with this case, ImPetro intends to submit Case No. 20666 by affidavit.

For these reasons, ImPetro respectfully requests that this case be continued to be heard on the next available docket, September 19, 2019.

RESPECTFULLY SUBMITTED

Gallagher & Kennedy, P.A.

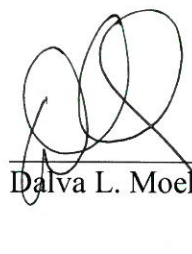
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading, was served electronically upon the following counsel on this 21st day of August, 2019.

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