

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION, THROUGH THE ENFORCEMENT AND COMPLIANCE MANAGER, FOR A COMPLIANCE ORDER AGAINST C & D MANAGEMENT COMPANY D/B/A FREEDOM VENTURES COMPANY, FINDING THAT THE OPERATOR KNOWINGLY AND WILLFULLY VIOLATED 19.15.13.1115 NMAC AND KNOWINGLY AND WILLFULLY VIOLATED 19.15.4.201 NMAC; ASSESSING PENALTIES; REQUIRING OPERATOR TO BRING SAID WELLS INTO COMPLIANCE WITH 19.15.13.1115 NMAC AND 19.15.4.201 NMAC BY A DATE CERTAIN; AND IN THE EVENT OF NON-COMPLIANCE, DECLARING THE WELLS ABANDONED AND AUTHORIZING THE DIVISION TO PLUG THE WELLS AND FORFEIT THE APPLICABLE FINANCIAL ASSURANCE, EDDY COUNTY, NEW MEXICO.

**CASE NO. 14055
De Novo
ORDER NO. R-12913**

MOTION TO WITHDRAW AS COUNSEL

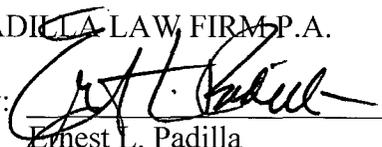
COMES NOW, Ernest L. Padilla, Padilla Law Firm P.A., hereby submits his request to withdraw from further representation of C&D Management Company d/b/a Freedom Ventures Company. As grounds for this motion, undersigned counsel states:

1. C & D Management Company d/b/a Freedom Ventures Company has not met undersigned counsel's requirements.
2. Counsel for the Oil Conservation Division does not oppose this motion.

WHEREFORE, movant requests that he be allowed to withdraw as counsel for C&D Management Company D/B/A Freedom Ventures Company.

Respectfully submitted,

PADILLA LAW FIRM P.A.

By: 

Ernest L. Padilla
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing pleading sent by email to:

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Oil Conservation Division
1220 S. St. Francis Dr.
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FAX: 476-3480
email: sonny.swazo@state.nm.us

this 14th day of October, 2010.



ERNEST L. PADILLA