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NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

March 21, 1996

HAND DELIVERED

Mr. David R. Catanach
Hearing Examiner
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Rand Carroll, Esq.
Division Attorney
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505


*Re: NMOCD Case 11481
Black River "10" Federal Com Well No. 1
Application of Nearburg Exploration Company
for Unorthodox well Location,
Eddy County, New Mexico*

Gentlemen:

On behalf of Nearburg Exploration Company, please find enclosed our Response to the Motion to Quash filed yesterday by Mr. Padilla on behalf of Read & Stevens, Inc.

I would appreciate the opportunity to argue this issue before you at the NMOCD offices at 11:00 AM on Monday, March 25, 1996. Please let Mr. Padilla and me know if that is convenient.

Very truly yours,



W. Thomas Kellahin

via hand delivery:

cc: Ernest L. Padilla, Esq.
Attorney for Read & Stevens, Inc.