

*Case file*  
*1615*

BEFORE THE OIL CONSERVATION COMMISSION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION OF NEW MEXICO FOR  
THE PURPOSE OF CONSIDERING:

CASE NO. 1615

APPLICATION OF STANLEY JONES,  
ET AL, FOR AN ORDER REQUIRING  
MALCO REFINERIES INC., TO  
PURCHASE OIL PRODUCED FROM THE  
DAYTON-ABO POOL IN EDDY COUNTY,  
NEW MEXICO

ORDER NO. E-1363

MOTION FOR CONTINUANCE

COMES NOW, Continental Pipe Line Company by its attorneys,  
Seth, Montgomery, Federici & Andrews, and R. C. Hawley, and  
hereby moves that the rehearing in respect to the matters  
determined in this Commission's Order No. E-1363 be continued  
from May 14, 1959, to a later date to be determined by this  
Commission, and as grounds for this Motion states:

1. On May 1, 1959, Continental Pipe Line Company, a  
Delaware corporation, authorized to do and doing business in  
the State of New Mexico, for good and sufficient consideration  
purchased the crude oil pipeline system in Eddy and Chaves  
Counties, New Mexico owned by Malco Refineries Inc., from said  
Malco Refineries Inc.

2. That prior to such purchase Continental Pipe Line  
Company did not have sufficient knowledge, information or  
interest in Case No. 1615 to fully advise itself as to whether  
its rights as a purchaser of such crude oil pipeline system  
would be affected by Order No. E-1363 of this Commission.

3. That in the event the rights of Continental Pipe  
Line Company will be adversely affected by the terms and provi-  
sions of said Order, Continental Pipe Line Company is entitled  
to sufficient time to make a thorough investigation of the matter

and adequately prepare for the protection of its rights at any rehearing before this Commission.

3. That a denial of sufficient time in which to prepare an adequate defense of its rights would be in violation of the due process of law provisions of the Constitution of the State of New Mexico and of the United States Constitution.

4. That additional time is necessary in order to allow Continental Pipe Line Company to make investigation for the purpose of determining what position it will take in regard to the rehearing of this matter.

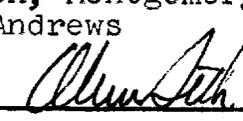
WHEREFORE, Continental Pipe Line Company respectfully moves the Commission to grant this Motion allowing a continuance of the rehearing in this case for May 14, 1959, to a later date to be determined by this Commission, which later date shall permit Continental Pipe Line Company to make full investigation of the matters involved in this case and determine what course it should follow in order to adequately protect its rights.

Respectfully submitted,

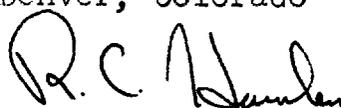
CONTINENTAL PIPE LINE COMPANY

BY:

Seth, Montgomery, Federici &  
Andrews

By 

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