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FAX FILING COVER PAGE

TO: New Mexico Oil Conservation Division
(505) 476-3462

FROM: Stephen D. Ingram

DATE: March 2, 2015

RE: OCD File Nos. 15269, 15270

MESSAGE: Attached for fax filing is Respondent's Motion for Continuance.

RECEIVED
MAR 12 2015
OCD

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

**APPLICATION OF CHEVRON U.S.A., INC.
FOR A NON-STANDARD SPACING AND
PRORATION UNIT, AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

**Case No. 15269
Case No. 15270**

RESPONDENT'S MOTION FOR CONTINUANCE

Trabajo Del Spear, LP, a non-operating working interest owner and Respondent in this matter, moves for a continuance of the March 5, 2015 hearing on the Application of Applicant Chevron U.S.A., Inc. to the hearing examiner's next available hearing docket of March 19, 2015, and in support thereof would show as follows:

Respondent recently received Applicant's proposed Joint Operating Agreement. There are several provisions therein with which Respondent takes issue, and Respondent wishes to have additional time in order to negotiate the terms of the proposed JOA with Applicant prior to having its interests subject to being force-pooled and/or prior to the time for submission of its share of drilling costs in connection with its participation in the proposed wells. Applicant opposes Respondent's requested continuance. Respondent does not believe that the requested continuance would prejudice Applicant, and its request for a continuance would serve the interests of preventing waste and protecting correlative rights.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

Stephen D. Ingram

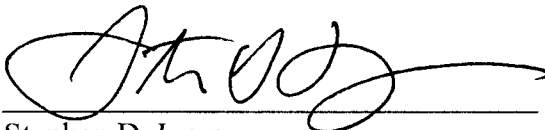
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ATTORNEY FOR TRABAJO DEL SPEAR, LP

I hereby certify that a true and correct copy of the foregoing was served via U.S. mail and e-mail on March 2, 2015 to the following:

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