BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION

APPLICATION OF CHISHOLM ENERGY OPERATING, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 16115

APPLICATION OF CHISHOLM ENERGY OPERATING, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 16116

MOTION FOR CONTINUANCE

PREMIER OIL & GAS, INC., ("Premier") by and through it undersigned attorney, moves the Commission for an allowing continuance of the above captioned cases for the January 17, 2019 docket to the Commissions February 14, 2019 docket, and in support thereof, states:

- 1. Premier's preparation of the engineering and geological aspects of the case will not be finalized by its expert witness in time for the hearing.
- 2. The inability to finalize the preparation of its presentation has been due to the inability of Premier's in-house engineer, Dan Jones (who testified and presented Premier's technical case before the Division) to coordinate with the additional expert witness. Dan Jones' inability has been due to his wife's medical issues.
- Counsel for Chisholm was contacted for concurrence, but opposes this
 Motion for Continuance.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this pleading to be sent by electronic mail served upon:

Adam G. Rankin Holland & Hart PO Box 2208 Santa Fe, New Mexico 87504-2208 agrankin@hollandhart.com

Bill Brancard, General Counsel New Mexico Oil Conservation Commission 1220 S. St. Francis Drive Santa Fe, NM 87505 bill.brancard@state.nm.us

on this 9th day of January, 2019.

/s/ ERNEST L. PADILLA ERNEST L. PADILLA