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

APPLICATION OF SPUR ENERGY PARTNERS, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NOS. 21935-21936

SPUR ENERGY PARTNERS, LLC'S RESPONSE TO CONTANGO OIL AND GAS COMPANY'S MOTION FOR CONTINUANCE

Spur Energy Partners, LLC ("Spur") submits its Response to the Motion for Continuance of Case Nos. 21935 and 21936 filed by Contango Oil & Gas Company ("Contango"). Spur requests the Motion be denied, and in support states the following:

- 1. The above-referenced cases filed by Spur seek orders pooling all uncommitted interests in the Yeso formation into standard horizontal spacing units comprised of the N/2 of Section 36, Township 17 South, Range 27 East, Eddy County, New Mexico.
- 2. The proposed horizontal spacing units will be dedicated to five initial wells to be drilled simultaneously.
 - 3. These cases are scheduled for the June 3, 2021 hearing docket.
- 4. On May 27, 2021, Contango filed a motion to continue these cases to the July 15, 2021 hearing docket.
- 5. On June 1, 2021, Spur requested the Division set these cases for a status conference on June 3, 2021, to determine a timely future hearing date.
- 6. Spur objects to Contango's Motion since it would unnecessarily delay securing a special hearing date for these cases by roughly six weeks, potentially impacting Spur's drilling schedule.

WHEREFORE, Spur Energy Partners, LLC respectfully requests that the Division deny Contango's Motion for Continuance of Case Nos. 21935 and 21936 and set these matters for a status conference on the June 3rd hearing docket.

Respectfully submitted,

HINKLE SHANOR, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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