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2011 JUL 26 P 1: 20

July 26, 2011

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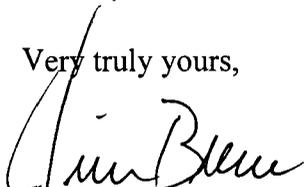
Jami Bailey, Director
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Cases 14558 (de novo) and 14577 (de novo)

Dear Ms. Bailey:

Enclosed are an original and five copies of a motion for a continuance. COG opposes the motion, and ConocoPhillips concurs in the motion. Your attention to this matter is appreciated.

Very truly yours,



James Bruce

Attorney for Cimarex Energy Co. of Colorado

cc: Counsel of record

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

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IN THE MATTER OF THE HEARINGS CALLED
BY THE OIL CONSERVATION COMMISSION
FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF MARBOB ENERGY CORPORATION
FOR VERTICAL EXPANSION OF THE BURCH-KEELY
UNIT, EDDY COUNTY, NEW MEXICO.

Case No. 14558 (*de novo*)

APPLICATION OF COG OPERATING LLC FOR
VERTICAL EXPANSION OF THE GRAYBURG-
JACKSON (SEVEN RIVERS-QUEEN-GRAYBURG-
SAN ANDRES) POOL TO CORRESPOND WITH
THE UNITIZED FORMATION OF THE BURCH-
KEELY UNIT, EDDY COUNTY, NEW MEXICO.

Case No. 14,577 (*de novo*)

MOTION FOR A CONTINUANCE

Cimarex Energy Co. of Colorado and Magnum Hunter Production, Inc. move the Commission for a continuance of these cases, and in support thereof state:

1. Cimarex Energy Co. of Colorado is an operator in the Grayburg Deep Unit, which underlies most or all of the acreage in the Burch-Keely Unit. See, e.g., Exhibit A. Magnum Hunter Production, Inc. is a working interest owner in the Grayburg Deep Unit. They oppose the relief sought by COG Operating LLC in these cases because it will impair correlative rights and cause waste.

2. Neither Cimarex Energy Co. of Colorado and Magnum Hunter Production, Inc. was notified of Case Nos. 14558 and 14577. (The case file for Case No. 14577 shows that Cimarex Energy Co., a related company, was notified of that case, but the notice was misplaced.)

3. Personnel of Cimarex Energy Co. of Colorado and Magnum Hunter Production, Inc. very recently became aware of these two matters, and desire to participate and present evidence. Additional time is needed for their witnesses to prepare for hearing.

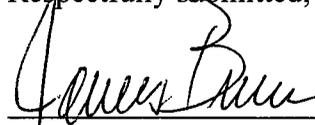
4. Moreover, there is a case on the docket for the August 4, 2011 Division hearing, Case No. 14673, entitled "Application of COG Operating LLC for the creation of a new pool and the contraction of the Grayburg Jackson Pool within the Burch-Keely Unit, Eddy County, New Mexico." That case is related to the two cases currently before the Commission. Cimarex Energy Co. of Colorado, Magnum Hunter Production, Inc., and ConocoPhillips Company are parties to that case. No doubt the order entered in that case will be appealed, and it makes sense to hear all three cases at once.

5. ConocoPhillips Company does not oppose this motion.

6. COG Operating LLC opposes this motion.

WHEREFORE, Cimarex Energy Co. of Colorado and Magnum Hunter Production, Inc. move for an order continuing these cases to a future Commission docket.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Cimarex Energy Co. of
Colorado and Magnum Hunter Production,
Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 26th day of July, 2011 by facsimile and e-mail transmission:

Carol Leach
Beatty & Wozniak, P.C.
500 Don Gaspar Avenue
Santa Fe, New Mexico 87501
(505) 983-8547

Michael B. Campbell
Campbell Trial Law LLC
Suite 6
110 North Guadalupe Street
Santa Fe, New Mexico 87501
(505) 820-1926

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above a horizontal line.

James Bruce

Operator: COG OPERATING LLC

3001532757 K -24-17S-29E 1980 FSL & 1975 FWL
Well Name & Number: BURCH KEELY UNIT No. 340
Operator: COG OPERATING LLC

3001532867 P -24-17S-29E 610 FSL & 1295 FEL
Well Name & Number: BURCH KEELY UNIT No. 365
Operator: COG OPERATING LLC

3001533812 A -24-17S-29E 330 FNL & 330 FEL
Well Name & Number: BURCH KEELY UNIT No. 387
Operator: COG OPERATING LLC

3001533813 B -24-17S-29E 1295 FNL & 1980 FEL
Well Name & Number: BURCH KEELY UNIT No. 384
Operator: COG OPERATING LLC

3001534018 B -24-17S-29E 25 FNL & 1345 FEL
Well Name & Number: BURCH KEELY UNIT No. 393
Operator: COG OPERATING LLC

3001534141 O -24-17S-29E 855 FSL & 1330 FEL
Well Name & Number: GRAYBURG DEEP UNIT No. 016
Operator: CONOCOPHILLIPS COMPANY

3001534905 A -24-17S-29E 690 FNL & 950 FEL
Well Name & Number: GRAYBURG DEEP UNIT No. 018
Operator: CIMAREX ENERGY CO. OF COLORADO

3001535246 C -24-17S-29E 330 FNL & 1850 FWL
Well Name & Number: BURCH KEELY UNIT No. 400
Operator: COG OPERATING LLC

3001535432 B -24-17S-29E 800 FNL & 1725 FEL
Well Name & Number: BURCH KEELY UNIT No. 401
Operator: COG OPERATING LLC

3001535439 G -24-17S-29E 1885 FNL & 2470 FEL
Well Name & Number: BURCH KEELY UNIT No. 405
Operator: COG OPERATING LLC

3001535440 A -24-17S-29E 1170 FNL & 290 FEL
Well Name & Number: BURCH KEELY UNIT No. 402
Operator: COG OPERATING LLC

3001535564 K -24-17S-29E 2130 FSL & 1345 FWL
Well Name & Number: BURCH KEELY UNIT No. 406
Operator: COG OPERATING LLC

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EXHIBIT *A*

Operator: COG OPERATING LLC

3001532970 C -19-17S-30E 660 FNL & 1320 FWL

Well Name & Number: BURCH KEELY UNIT No. 360

Operator: COG OPERATING LLC

3001532971 B -19-17S-30E 1295 FNL & 1980 FEL

Well Name & Number: BURCH KEELY UNIT No. 362

Operator: COG OPERATING LLC

3001532972 P -19-17S-30E 1100 FSL & 660 FEL

Well Name & Number: BURCH KEELY UNIT No. 364

Operator: COG OPERATING LLC

3001532991 A -19-17S-30E 965 FNL & 330 FEL

Well Name & Number: BURCH KEELY UNIT No. 361

Operator: COG OPERATING LLC

3001532992 3 -19-17S-30E 1750 FSL & 1070 FWL

Well Name & Number: BURCH KEELY UNIT No. 363

Operator: COG OPERATING LLC

3001533558 K -19-17S-30E 1600 FSL & 2250 FWL

Well Name & Number: BURCH KEELY UNIT No. 370

Operator: COG OPERATING LLC

3001533569 4 -19-17S-30E 720 FSL & 720 FWL

Well Name & Number: BURCH KEELY UNIT No. 376

Operator: COG OPERATING LLC

3001533815 S -19-17S-30E 1980 FNL & 710 FWL

Well Name & Number: BURCH KEELY UNIT No. 388

Operator: COG OPERATING LLC

3001533816 B -19-17S-30E 660 FNL & 2559 FEL

Well Name & Number: BURCH KEELY UNIT No. 379

Operator: COG OPERATING LLC

3001534192 J -19-17S-30E 1640 FSL & 2100 FEL

Well Name & Number: GRAYBURG DEEP No. 020

Operator: CIMAREX ENERGY CO. OF COLORADO

3001534214 C -19-17S-30E 1990 FSL & 445 FWL

Well Name & Number: GRAYBURG DEEP No. 017

Operator: CONOCOPHILLIPS COMPANY

3001535441 C -19-17S-30E 250 FNL & 2130 FWL

Well Name & Number: BURCH KEELY UNIT No. 403

Operator: COG OPERATING LLC

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