

# LAKINS LAW FIRM, P.C.

Charles N. Lakins, Esq.

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## ATTORNEY-CLIENT PRIVILEGED INFORMATION

**DATE:** February 11, 2013 **TIME:** 3:15 PM  
**TO:** New Mexico Oil Conservation Division  
**ATTN:** Florene Davidson  
**FAX NO:** (505) 476-3462  
**FROM:** Charles N. Lakins, Esq. - (877) 604-8340  
**RE:** Application of Los Lobos - OCD Case No. 14948  
**CC:** Michelle Henri - (505) 842-0033

### NUMBER OF PAGES, INCLUDING COVER: 4

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Hard Copy to Follow ☐ Yes By: ☐ Mail ☐ Overnight ☐ Hand Deliver  
☒ No

Ms. Davidson, please accept the attached Entry of Appearance and Motion for Continuance for filing in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions don't hesitate calling.



C.N. Lakins

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

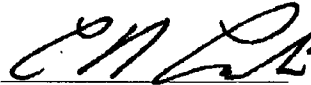
**CASE NO. 14948**

**APPLICATION OF LOS LOBOS RENEWABLE POWER, LLC  
(FORMS G-112) FOR APPROVAL TO INJECT INTO A  
GEOTHERMAL AQUIFER THROUGH TWO PROPOSED  
GEOTHERMAL INJECTION WELLS AT THE SIDE OF THE  
PROPOSED LIGHTNING DOCK GEOTHERMAL POWER  
PLANT, HIDALGO COUNTY, NEW MEXICO.**

**ENTRY OF APPEARANCE**

**THE LAKINS LAW FIRM, P.C.** (Charles N. Lakins, Esq.) hereby enters its  
appearance on behalf of the Protestant AmeriCulture, Inc. in the above reference matter.

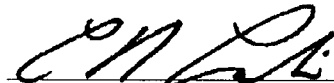
Respectfully submitted,  
LAKINS LAW FIRM, P.C.



Charles N. Lakins, Esq.  
P.O. Box 91357  
Albuquerque, NM 87109  
Office: (505) 404-9377  
Fax: (877) 604-8340

**CERTIFICATE OF SERVICE**

I, Charles N. Lakins, do hereby certify that I faxed a true and correct copy of this Entry of Appearance to all counsel of record in this matter.

  
Charles N. Lakins, Esq.

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

**CASE NO. 14948**

**APPLICATION OF LOS LOBOS RENEWABLE POWER, LLC  
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GEOTHERMAL INJECTION WELLS AT THE SIDE OF THE  
PROPOSED LIGHTNING DOCK GEOTHERMAL POWER  
PLANT, HIDALGO COUNTY, NEW MEXICO.**

**MOTION FOR CONTINUANCE**

THE PROTESTANT AmeriCulture, Inc., by and through undersigned counsel of record, hereby requests that the February 21, 2012 Hearing set in the above reference matter be continued for a minimum of two weeks. In support of this Request, Protestant states:

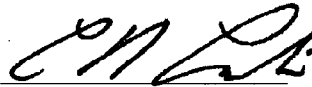
1. On February 4, 2013 Protestant AmeriCulture, Inc. filed its Motion for Continuance. The Motion was largely predicated upon the need for AmeriCulture, Inc. to obtain counsel.
2. On February 5, 2013 the Oil Conservation Division entered its Order rescheduling this matter to the February 21, 2013 Division docket.
3. On February 11, 2013, Protestant AmeriCulture, Inc. engaged undersigned counsel for representation of Protestant's interests in this matter.
4. Undersigned counsel does not have adequate time to sufficiently prepare for participation in the currently scheduled February 21, 2013 hearing.
5. It would be highly prejudicial to Protestant AmeriCulture, Inc. to not permit its newly-obtained counsel to sufficiently prepare for hearing on this matter.
6. Due to the issues involved in this matter, the Applicant would not be prejudiced or suffer any legal consequence if this matter were to be continued for a minimum of two weeks.

7. Due to the Applicant's prior opposition to Protestant AmeriCulture, Inc.'s request for continuance, undersigned counsel did not seek concurrence of counsel for Applicant on this motion.

**WHEREFORE**, Protestant AmeriCulture, Inc. respectfully request that the Oil Conservation Division:

- A. Grant Protestant's Motion for Continuance; and
- B. Set this matter for hearing on the Division's docket not prior to March 7, 2013; and
- C. Set this matter on a Division docket that does not result in this matter being set for an insufficient period of time of less than one day, requiring the matter to be continued to a subsequent docket.

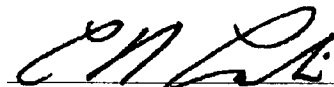
Respectfully submitted,  
LAKINS LAW FIRM, P.C.



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**CERTIFICATE OF SERVICE**

I, Charles N. Lakins, do hereby certify that I faxed a true and correct copy of this Entry of Appearance to all counsel of record in this matter.



Charles N. Lakins, Esq.