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To: David R. Catanach
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From: Elizabeth Shields
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Sent on: Tuesday, October 25 2016 at 6:32 PM EDT

Certificate of Service

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 25th day of October 2016.

James Bruce
Attorney at Law
P.O. Box 1056
Santa Fe, New Mexico 87504
jamesbruce@aol.com



Elizabeth A. Shields

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

APPLICATION OF MEWBOURNE OIL COMPANY
FOR A NON-STANDARD SPACING AND PRORATION
UNIT, COMPULSORY POOLING, AND AN
UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

Case No. 15510

Case No. 15511

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW, Manuela Franco, by and through her undersigned attorneys, Carson Ryan LLC, (Joel M. Carson III and Elizabeth A. Shields), and respectfully moves for a continuance of Case No. 15510 and No. 15511 for two weeks. Franco and the Bankruptcy Trustee are in discussion with Mewbourne regarding have a lease that will render the proceeding concerning the Franco interest moot. Applicant Mewbourne Oil Company does not oppose this motion.

Respectfully submitted,

CARSON RYAN LLC

By: 

Joel M. Carson III
Elizabeth A. Shields
P.O. Box 1612
Roswell, New Mexico 88201
(575) 291-7606
joel@carsonryan.com
elizabeth@carsonryan.com

Attorneys for Manuela Franco

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4-20-16 7/21/16

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Joel M. Carson III
Elizabeth A. Ryan
Christopher A. Landerman
Elizabeth A. Shields

CARSON RYAN LLC

Attorneys at Law

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Roswell, NM 88202-1612
Phone (575) 291-7606

Email: elizabeth@carsonryan.com

October 25, 2016

Via Fax (505) 476-3462

Mr. David R. Catanach
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Case Nos. 15510 and 15511: Application of Mewbourne Oil Company for a
Non-Standard Spacing and Proration Unit, Compulsory Pooling, and an
Unorthodox Gas Well Location, Eddy County, New Mexico.**

Dear Mr. Catanach:

Joel M. Carson III
Elizabeth A. Ryan
Christopher A. Lauderman*
Elizabeth A. Shields

CARSON RYAN LLC

400 E. College Blvd., Suite C
P.O. Box 1612
Roswell, NM 88202-1612
Phone (575) 291-7606

Attorneys at Law

*Licensed only in Colorado & West Virginia

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Email: elizabeth@carsonryan.com

September 23, 2016

Via Federal Express
& Fax (505)476-3462

Mr. David R. Catanach
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Case Nos. 15510 and 15511: Application of Mewbourne Oil Company for a Non-Standard Spacing and Proration Unit, Compulsory Pooling, and an Unorthodox Gas Well Location, Eddy County, New Mexico.

Dear Mr. Catanach:

We represent Manuela Franco. We are currently in negotiations with the Applicant in the above referenced cases. The Applicant has agreed to our request for continuance. To that end, please find enclosed our Entry of Appearance and Unopposed Motion for Continuance in these matters.

Your attention in this regard is appreciated.

Very truly yours,

CARSON RYAN LLC



Elizabeth A. Shields,
Attorney

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

**APPLICATION OF MEWBOURNE OIL COMPANY
FOR A NON-STANDARD SPACING AND PRORATION
UNIT, COMPULSORY POOLING, AND AN
UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.**

Case No. 15510

Case No. 15511

ENTRY OF APPEARANCE

Manuela Franco, by and through her undersigned attorneys, Carson Ryan LLC, (Joel M. Carson III and Elizabeth A. Shields), hereby enters its appearance in the above matter.

Respectfully submitted,

CARSON RYAN LLC

By: 

Joel M. Carson III
Elizabeth A. Shields
P.O. Box 1612
Roswell, New Mexico 88201
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elizabeth@carsonryan.com

Attorneys for Manuela Franco

Certificate of Service

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 23rd day of September 2016.

James Bruce
Attorney at Law
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Santa Fe, New Mexico 87504
jamesbruc@aol.com

A handwritten signature in black ink, appearing to read "E. Shields", written over a horizontal line.

Elizabeth A. Shields

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

**APPLICATION OF MEWBOURNE OIL COMPANY
FOR A NON-STANDARD SPACING AND PRORATION
UNIT, COMPULSORY POOLING, AND AN
UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.**

Case No. 15510

Case No. 15511

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW, Manuela Franco, by and through her undersigned attorneys, Carson Ryan LLC, (Joel M. Carson III and Elizabeth A. Shields), and respectfully moves for a continuance of Case No. 15510 and No. 15511. Applicant Mewbourne Oil Company has consented to our motion.

Respectfully submitted,

CARSON RYAN LLC

By: 

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