## STATE OF NEW MEXICO RECEIVED OCCUPANTMENT OIL CONSERVATION DIVISION SEP -7 P 1: 04

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF ONEENERGY PARTNERS OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15,758

APPLICATION OF ONEENERGY PARTNERS OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15,759

## **MOTION FOR CONTINUANCE**

V-F Petroleum Inc., Fuel Products, Inc., Gahr Energy Company, Ameristate Partners LLC, Ameristate Energy LLC, HFLP E&P LLC, Thomas M. Beall, Jerry M. Gahr, Marcus Wayne Luna, Sandra K. Lawlis, Clifford N. Hair, and Mark K. Nearburg (collectively, "V-F") move the Division for an order continuing these cases for two weeks, and in support thereof states:

- 1. These cases are set for hearing on September 14<sup>th</sup> (continued from the August 17<sup>th</sup> docket, at which time evidence was presented).
  - 2. V-F requests a continuance for the following reasons:
  - (a) V-F has witness availability issues both Scott Germann and Brad Wolters are unable to attend the hearing on September 14<sup>th</sup>.
  - (b) September 14<sup>th</sup> is a long docket. The undersigned represents Kaiser-Francis in its pool rules cases (15821-15824) which, combined (and uncontested), will take at least two hours to present. I also represent Forty Acres in its unitization/waterflood cases (15792 and 15793) which, combined (and uncontested), could take close to two hours to present.
  - (c) There are many other cases on the docket (in which I am not involved) which will also be heard.
  - (d) The undersigned must also leave town in the morning of Friday, September 15th, so I must finish up Thursday or early Friday.

- 3. OneEnergy's landman stated at the prior hearing that it has no time deadlines in the next year, so a two week continuance is not harmful.
  - 4. Counsel for OneEnergy objects to the continuance.

WHEREFORE, V-F requests that the above cases be continued to the September 28, 2017 docket.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

jamesbruc@aol.com

Attorney for V-F Petroleum Inc., Fuel Products, Inc., Gahr Energy Company, Ameristate Partners LLC, Ameristate Energy LLC, HFLP E&P LLC, Thomas M. Beall, Jerry M. Gahr, Marcus Wayne Luna, Sandra K. Lawlis, Clifford N. Hair, and Mark K. Nearburg

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this \_\_\_\_\_\_\_ day of September, 2017 via e-mail:

Jordan L. Kessler jlkessler@hollandhart.com

James Bruce