

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

**APPLICATION OF ADVANCE ENERGY PARTNERS
HAT MESA, LLC FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

MAY 25 2018 PM 04:37

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Case No. 1609~~5~~, 1609~~6~~ and 1609~~7~~

**ADVANCE ENERGY PARTNERS'
RESPONSE TO MOTION FOR CONTINUANCE**

Advance Energy Partners Hat Mesa, LLC ("AEP"), for its Response to COG's Motion for Continuance, states:

1. COG, AEP and their respective counsel have been working in good faith to resolve their differences and to avoid unnecessary delays or duplicative and conflicting compulsory pooling hearings.

2. COG first requested a two-week continuance and although AEP initially resisted that, COG was informed this morning that a two-week continuance would be agreeable. AEP believes that it will be possible for COG to obtain the upper-management approvals to close on a settlement arrangement by June 14th. AEP would like to preserve the right to proceed to hearing on June 14th.

3. The lands that are the subject of AEP's Applications are located in Section 17, T21S, R33E. AEP plans to begin development of this acreage at the same time it commences development on its prospect located in Section 15 of the same township. A delay involving the acreage in Section 17 would disrupt AEP's development plans.

4. AEP does not believe that COG is in a position to file competing compulsory pooling applications at this time. Neither would it be in a position to present its compulsory pooling cases on June 28th.

5. Counsel are in agreement that a brief pre-hearing conference on May 29th would be warranted.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ J. Scott Hall

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on May 25, 2018:

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/s/ J. Scott Hall

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