

**MONTGOMERY & ANDREWS**

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February 13, 2001

**VIA HAND DELIVERY**

Lori Wrotenbery, Director  
Oil Conservation Commission  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

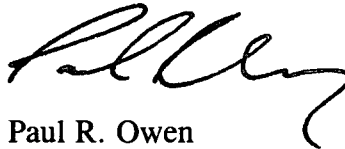
OIL CONSERVATION DIV.  
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**Re: New Mexico Oil Conservation Division Order No. R-11520;  
New Mexico Oil Conservation Case No. 12459;  
In the Matter of the Hearing Called by the New Mexico Oil Conservation Division  
on its Own Motion for an Order (I) Requiring I.T. Properties to Properly Plug  
and Abandon a Certain Well in Eddy County, New Mexico; or (II) Authorizing  
the Division to Plug and Abandon this Well, and Ordering a Forfeiture of any  
Plugging Bond Covering this Well.**

Dear Ms. Wrotenbery:

Enclosed in triplicate is the Application for Hearing De Novo, respecting the above-referenced Order. The Applicant I.T. Properties, Inc., respectfully requests that this matter be placed on the docket for the March 30, 2001 Oil Conservation Commission hearing.

Very truly yours,



Paul R. Owen

Enclosures

cc: Mr. K. Wendell Chen  
Steven Ross, Esq.  
Mr. Tim Gum

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

**IN THE MATTER OF THE HEARING CALLED BY THE  
NEW MEXICO OIL CONSERVATION DIVISION  
("DIVISION") THROUGH THE SUPERVISOR OF  
DIVISION DISTRICT II IN ARTESIA, NEW MEXICO,  
ON ITS OWN MOTION FOR AN ORDER (I) REQUIRING  
I.T. PROPERTIES TO PROPERLY PLUG AND  
ABANDON A CERTAIN WELL IN EDDY COUNTY, NEW  
MEXICO; OR (II) AUTHORIZING THE DIVISION TO  
PLUG AND ABANDON THIS WELL, AND ORDERING A  
FORFEITURE OF ANY PLUGGING BOND COVERING  
THIS WELL.**

CASE 12459  
ORDER NO. R-11520

**APPLICATION FOR HEARING DE NOVO**

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COMES NOW I.T. PROPERTIES, a party adversely affected by Order No. R-11520, and  
hereby applies for a hearing De Novo before the full Oil Conservation Commission, pursuant to  
NMSA 1978, Section 70-2-13 (1955).

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: \_\_\_\_\_

Paul R. Owen

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ATTORNEYS FOR I.T. PROPERTIES

OIL CONSERVATION DIV.  
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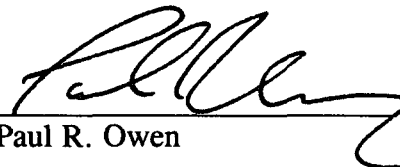
**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of February, 2001, a copy of the foregoing Application for Hearing De Novo was hand-delivered to the following:

Steven Ross, Esq.  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

and sent via first-class U.S. mail to the following:

Tim Gum  
District Supervisor, District II  
New Mexico Oil Conservation Division  
811 S. 1st Street  
Artesia, New Mexico 88210

  
Paul R. Owen