

BEFORE THE
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION
OF BASS ENTERPRISES PRODUCTION CO.
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.

CASE NO. 11048

MOTION FOR CONTINUANCE

COMES NOW MARALO INC., ("Maralo") through its undersigned attorneys, and hereby moves the Division for a continuance of the Examiner Hearing in the above-referenced case until the September 15, 1994, Examiner hearing docket, and in support of its motion states:

1. Maralo owns or represents approximately 33% of the working interest in the S/2 of Section 30, Township 23 South, Range 30 East, N.M.P.M., Eddy County, New Mexico, which Bass Enterprises Production Co. ("Bass") seeks to compulsory pool in the above referenced case. An Examiner hearing on this application has been scheduled for August 4, 1994.

2. Maralo is the operator of the N/2 of said Section 30 on which it is drilling the Goldrush 30 Federal Com No. 1 Well in Unit G to test all formations from the surface through the Morrow. On July 26, 1994, this well was at a drilling depth of 10,610 feet and will be completed and tested within six (6) weeks.

3. Bass has farmed out its interest in the N/2 of this section to Maralo and will have complete access to all data obtained from the Goldrush 30 Federal Com No. 1 Well.

4. Maralo seeks a continuance of the hearing on this application so that the data which will be obtained from the well being drilled in the N/2 of this section is available before final decisions are made on matters like the well location in the S/2 of this section and whether or not Maralo should participate in the well.

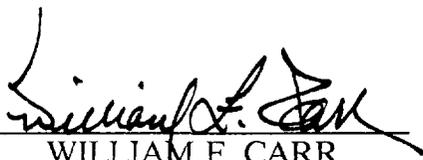
5. Maralo is unaware of any lease expiration or other matter that would require Bass to drill this well prior to September 15, 1994.

6. Unless this hearing is continued, Maralo will have no choice but to assume what it believes to be an unnecessary adversary position at the August 4, 1994 hearing and then, after an Order is entered, seek *De Novo* review of this application. This could result in unnecessary work on the part of the parties, the Division and the Commission, cause all parties to incur unnecessary costs and ultimately delay the drilling of a well in the S/2 of this section.

WHEREFORE, Maralo, Inc. requests that the Examiner hearing in Case 11048 be continued until September 15, 1994.

Respectfully submitted,

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.

By: 

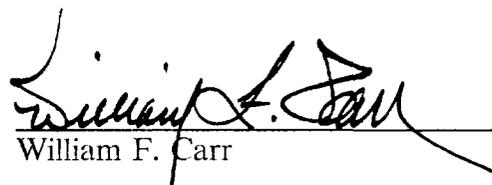
WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR MARALO, INC.

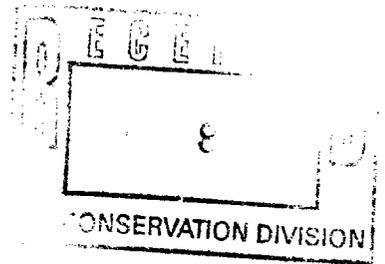
CERTIFICATE OF MAILING

I hereby certify that on this 28th day of July, 1994, I have caused to be mailed a copy of our Motion for Continuance in the above-captioned cases to the following counsel of record:

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504


William F. Carr

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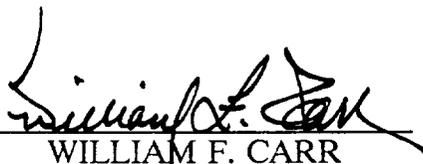
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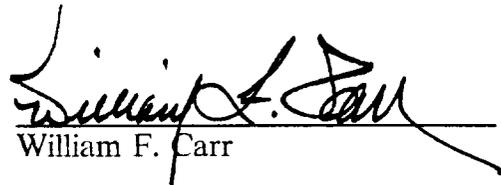
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