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July 14, 1999

Via Fax and U.S. Mail

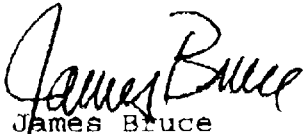
Mark Ashley
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Cases 12207 and 12208

Dear Mr. Ashley:

Enclosed for filing are an original and one copy of a response in opposition to Intoil, Inc.'s motion for a continuance.

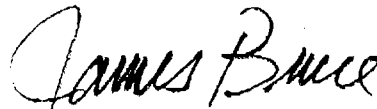
Very truly yours,


James Bruce

Attorney for St. Mary Land
& Exploration Company

requests a special hearing date early in the week of August 2nd (preferably August 3rd). This request is made because (a) the number of cases currently scheduled for the August 5th hearing may preclude all cases from being heard on August 5th, and (b) the number of cases scheduled for the August 19th hearing, combined with several Commission cases set during that same period, may preclude these cases from being heard until September.

Respectfully submitted,

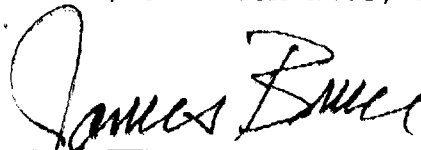


James Bruce
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Attorney for St. Mary Land &
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served this 14th day of July, 1999 by facsimile transmission and United States Mail upon William F. Carr, P.O. Box 2208, Santa Fe, New Mexico 87504, (505) 983-6043.



James Bruce

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF ST. MARY LAND &
EXPLORATION COMPANY FOR STATUTORY
UNITIZATION, EDDY AND LEA COUNTIES,
NEW MEXICO.

Case No. 12207

APPLICATION OF ST. MARY LAND &
EXPLORATION COMPANY FOR APPROVAL
OF A WATERFLOOD PROJECT AND TO
QUALIFY THE PROJECT FOR THE
RECOVERED OIL TAX RATE, EDDY
AND LEA COUNTIES, NEW MEXICO.

Case No. 12208

**APPLICANT'S RESPONSE IN OPPOSITION
TO INTOIL'S MOTION FOR A CONTINUANCE**

St. Mary Land & Exploration Company ("St. Mary") opposes Intoil, Inc.'s ("Intoil's") motion for a continuance. In support thereof, St. Mary states:

1. These cases were originally set for hearing on June 24, 1999. Intoil's engineering witness was unavailable for both the June 24th and July 8th hearings, so St. Mary voluntarily agreed to a four week continuance. Another continuance is therefore improper.

2. Bottomhole pressures in the subject pool are very low, and injection into and re-pressuring of the reservoir needs to commence as soon as possible. Therefore, another delay in the hearing is detrimental to the reservoir.

3. St. Mary's geologic witness is unavailable for all of the August 5th hearing, and thus a continuance should not be granted.

4. Another attorney can present Intoil's case at the July 22nd hearing.

WHEREFORE, St. Mary requests the Division to deny Intoil's motion for a continuance. **If a continuance is granted, St. Mary**