MAIN OFFICE OCC LAW OFFICES OF W. A. KELEHER A. H. MCLEOD W. A. KELEHER ATTORNEYS AND COUNSELLORS AT LAW A.H.MCLEOD FIRST NATIONAL BANK BUILDING J. C. RYAN ALBUQUERQUE, NEW MEXICO JOHN B.TITTMANN May 8, 1954 Oil Conservation Commission, Santa Fe, New Mexico. Attention: Mr. Spurrier Gentlemen: Herewith please find original and two copies of Motion for deferment and continuance until a later day of the

hearing in Case No. 330, now scheduled for

Thanking you for your kind

Yours very truly,

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May 19th.

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BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

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

CASE NO. 330 Order No. R-128-A

THE APPLICATION OF STANOLIND OIL AND GAS COMPANY FOR THE AMENDMENT OF ORDER NO. R-110 RELATING TO THE BLANCO-MESAVERDE POOL, SAN JUAN AND RIO ARRIBA COUNTIES, NEW MEXICO.

TO SAID HONORABLE COMMISSION:

Now comes PUBCO DEVELOPMENT, INC., one of the parties in interest in the above entitled and numbered cause, and respectfully moves that the hearing on this matter, heretofore set for hearing on April 15, 1954, be continued, and in support of such application respectfully shows:

- 1. That this Commission has heretofore requested the San Juan Basin Operators Association to recommend such proration formula for gas produced in the San Juan Basin as in the opinion of said Association is fair, just and equitable. To that end said Association has heretofore appointed a Subcommittee consisting of engineers and geologists who are employed by certain of its members who have substantial holdings in the San Juan Basin and such Committee has been diligently laboring in that connection.
- 2. That the problem presented is difficult and complex and has required and will require intensive study and research in order for such a formula to be finally agreed upon.
- 3. That such Committee feels that additional time is needed in connection with its study and work on said subject

and that in advance of a thorough study and review of such questions it would not be in the public interest or in the interest of conservation for such a formula to be promulgated by this Commission.

WHEREFORE, Pubco Development, Inc. prays that the hearing on the above entitled and numbered application be continued for such time as to the Commission shall seem just and proper in the premises.

Dated April 1, 1954.

PUBCO DEVELOPMENT, INC.

By Coledock

Its attorney, First National Bank Bldg. Albuquerque, New Mexico

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

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CASE NO. 330 Order No. R-128-A

TO SAID HON CRABLE COMMISSION:

comes now PUBCO DEVELOPMENT, INC., one of the interested parties in the above entitled and numbered cause, and respectfully requests the vacation of the hearing heretofore set for May 19, 1954, and a resetting for June 19, 1954, for the following reasons:

- l. That the operators to be affected by any Order of the Commission following a hearing on the merits are now, and have been for many weeks last past, in good faith assembling data and information so that the merits of the problems involved can be intelligently submitted to the Commission.
- 2. That there is reason to believe that by exchange and interchange of information and data the operators involved may be enabled to narrow the issues, and probably reach a stipulated agreement for submission to the Commission.
- 3. That since April 15, 1954, the date of the continuance to May 19, 1954, good progress has been made in the direction of solving the problem involved, affecting both the major operators and the independents.

4. That a deferment for several weeks will not prejudice the rights of any operators in the Basin, and may make it possible for the achievement of a harmonious settlement of the issues involved, requiring only brief testimony before the Commission to support a Commission Order.

WHEREFORE, the deferment and continuance herein prayed for are respectfully requested.

PUBCO DEVELOPMENT, INC.,

Attorney
First National Bank Building,

Albuquerque, New Mexico.