

Case file
1615

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

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

CASE NO. 1615

ORDER NO. E-1363

APPLICATION OF STANLEY JONES,
ET AL, FOR AN ORDER REQUIRING
MALCO REFINERIES INC., TO
PURCHASE OIL PRODUCED FROM THE
DAYTON-ABO POOL IN EDDY COUNTY,
NEW MEXICO

MOTION FOR CONTINUANCE

COMES NOW, Continental Pipe Line Company by its attorneys,
Seth, Montgomery, Federici & Andrews, and R. C. Hawley, and
hereby moves that the rehearing in respect to the matters
determined in this Commission's Order No. E-1363 be continued
from May 14, 1959, to a later date to be determined by this
Commission, and as grounds for this Motion states:

1. On May 1, 1959, Continental Pipe Line Company, a
Delaware corporation, authorized to do and doing business in
the State of New Mexico, for good and sufficient consideration
purchased the crude oil pipeline system in Eddy and Chaves
Counties, New Mexico owned by Malco Refineries Inc., from said
Malco Refineries Inc.

2. That prior to such purchase Continental Pipe Line
Company did not have sufficient knowledge, information or
interest in Case No. 1615 to fully advise itself as to whether
its rights as a purchaser of such crude oil pipeline system
would be affected by Order No. E-1363 of this Commission.

3. That in the event the rights of Continental Pipe
Line Company will be adversely affected by the terms and provi-
sions of said Order, Continental Pipe Line Company is entitled
to sufficient time to make a thorough investigation of the matter

and adequately prepare for the protection of its rights at any rehearing before this Commission.

3. That a denial of sufficient time in which to prepare an adequate defense of its rights would be in violation of the due process of law provisions of the Constitution of the State of New Mexico and of the United States Constitution.

4. That additional time is necessary in order to allow Continental Pipe Line Company to make investigation for the purpose of determining what position it will take in regard to the rehearing of this matter.

WHEREFORE, Continental Pipe Line Company respectfully moves the Commission to grant this Motion allowing a continuance of the rehearing in this case for May 14, 1959, to a later date to be determined by this Commission, which later date shall permit Continental Pipe Line Company to make full investigation of the matters involved in this case and determine what course it should follow in order to adequately protect its rights.

Respectfully submitted,

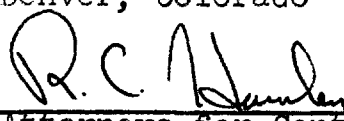
CONTINENTAL PIPE LINE COMPANY

BY:

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By 

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