

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

January 8, 2002

HAND DELIVERED

Ms. Lori Wrotenbery, Chair
Oil Conservation Commission
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: REQUEST FOR HEARING DENOVO

Order No. R-11700

NMOCD Case 12731

*Application of TMBR/Sharp Drilling, Inc.
for an order staying David H. Arrington
Oil & Gas, Inc. from commencing
operations, Lea County, New Mexico.*

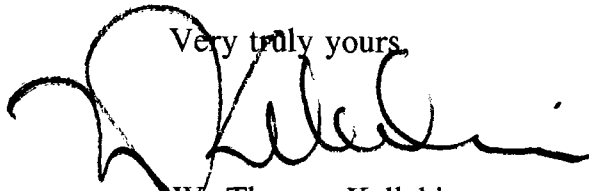
NMOCD Case 12744

*Application of TMBR/Sharp Drilling, Inc.
appealing the Hobbs District Supervisor's
decision denying approval of two applications
for permit to drill filed by TMBR/Sharp
Drilling, Inc., Lea County, New Mexico*

Dear Ms. Wrotenbery:

On behalf of TMBR/Sharp Drilling, Inc., please find enclosed our request for a Hearing DeNovo of the referenced cases before the New Mexico Oil Conservation Commission.

Very truly yours



W. Thomas Kellahin

cc: Earnest Carroll, Esq.
Attorney for Arrington
cc: TMBR/Sharp
Rick Montgomery, Esq.

02 JAN -7 PM 3:27
OIL CONSERVATION COM

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

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

CASE NO. 12731

**APPLICATION OF TMBR/SHARP DRILLING, INC.
FOR AN ORDER STAYING DAVID H. ARRINGTON
OIL & GAS, INC. FROM COMMENCING OPERATIONS
LEA COUNTY, NEW MEXICO**

CASE NO. 12744

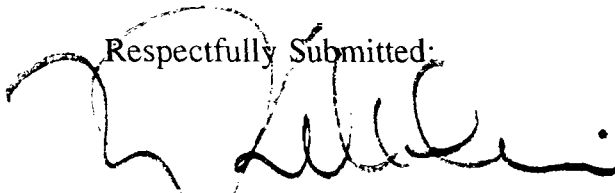
**APPLICATION OF TMBR/SHARP DRILLING, INC.
APPEALING THE HOBBS DISTRICT SUPERVISOR'S
DECISION DENYING APPROVAL OF TWO
APPLICATIONS FOR PERMIT TO DRILL FILED BY
TMBR/SHARP DRILLING, INC.
LEA COUNTY, NEW MEXICO**

02 JAN 17 PM 3:28
OL CONSERVATION DIV

**TMBR/SHARP DRILLING, INC.'S
REQUEST FOR A DE NOVO HEARING
BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION**

Comes now TMBR/Sharp Drilling, Inc., a party of record before the New Mexico Oil Conservation Division in Cases 12731 and 12744 and adversely affected by Division Order R-11700 entered December 13, 2001, by its attorneys Kellahin & Kellahin and pursuant to NMSA (1978) Section 70-2-13, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in these matters.

Respectfully Submitted:



W. Thomas Kellahin
Kellahin & Kellahin
P. O. Box 2265
Santa Fe, New Mexico 87501
(505) 982-4285
Attorneys for TMBR/Sharp Drilling, Inc.