

Case No.

757

Application, Transcript,
Small Exhibits, Etc.

OIL CONSERVATION COMMISSION

P. O. BOX 2088

SANTA FE, NEW MEXICO

May 3, 1963

Shelly Oil Company
P. O. Box 730
Hobbs, New Mexico 88340

Attention: Mr. H. E. Ash
District Superintendent

Re: Administrative Orders SEP-149 and SEP-149-A

Gentlemen:

We have your letter of April 20, 1963, requesting cancellation of the above Administrative Orders and the assignment of 120-acre non-standard unit approved by Orders Nos. S-340 and S-340-A to your Monice "W" Well No. 1, located 440 feet from the South line and 440 feet from the East line of Section 2, Township 21 South, Range 13 East, NMRN, Lea County, New Mexico.

Effective the date a Notice of Disconnection is received for your Monice "W" Well No. 4, located 230 feet from the North line and 440 feet from the East line of said Section 2, Administrative Orders SEP-149 and SEP-149-A are hereby cancelled and you are authorized to dedicate the 120-acre unit approved by Orders Nos. S-340 and S-340-A to your Monice "W" Well No. 1.

Very truly yours,

A. L. FORSTH, Jr.
Secretary-Director

ALF/JMD/ear

cc: Oil Conservation Commission - Hobbs
Oil & Gas Engineering Committee - Hobbs
Fracture Department, OCC - Santa Fe

OIL CONSERVATION COMMISSION

P. O. BOX 871

SANTA FE, NEW MEXICO

January 17, 1955

Skelly Oil Company
Box 38
HOES, NEW MEXICO

Attention: Mr. J. N. Dunlavy

Gentlemen:

We attach a copy of Order R-540-A issued nunc pro tunc
in Case 757, and signed by the Commission on January 13,
1955.

Yours very truly,

W. B. Macey
Secretary - Director

WBH:mr

C
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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 OF THE STATE OF NEW
MEXICO FOR THE PURPOSE OF CON-
SIDERING:

CASE NO. 757
ORDER NO. R-540-A

THE APPLICATION OF SKELLY OIL COMPANY
FOR AN ORDER GRANTING APPROVAL OF AN
EXCEPTION PURSUANT TO RULE 4 (b) (EUMONT)
OF ORDER NO. R-520 IN ESTABLISHMENT OF AN
UNORTHODOX GAS PRORATION UNIT OF 320
CONTIGUOUS ACRES CONSISTING OF SE/4 AND
LOTS 9, 10, 15 AND 16 OF SECTION 2, TOWNSHIP
21 SOUTH, RANGE 35 EAST, NMPM, LEA COUNTY,
NEW MEXICO, LOCATED PARTIALLY WITHIN THE
HORIZONTAL LIMITS OF THE EUMONT GAS POOL;
AND FURTHER, GRANTING APPROVAL OF AN
EXCEPTION TO RULE (2) (EUMONT) OF ORDER NO.
R-520-B, FOR AN UNORTHODOX LOCATION FOR ITS
MEXICO "W", WELL NO. 1, LOCATED 660' FROM THE
SOUTH LINE AND 660' FROM THE EAST LINE OF
SECTION 2, TOWNSHIP 21 SOUTH, RANGE 35 EAST.

NUNC PRO TUNC ORDER OF THE COMMISSION

BY THE COMMISSION:

It appearing to the Commission that Order R-540, dated November 17, 1954, does not correctly and accurately state the order of the Commission in certain particulars due to inadvertence and clerical error,

IT IS THEREFORE ORDERED:

That Order No. R-540, as the same appears in the records of the Commission, and the original of said Order, be amended in the following respects and particulars:

The last full paragraph of the order is ordered stricken and the following paragraph is substituted therefor:

"(2) That applicant's well, Mexico "W" Well No. 1, located in the SE/4 of Section 2, Township 21 South, Range 35 East, NMPM, shall be granted an allowable in accordance with the Eumont Pool Rules, and in the proportion that the above described 320-acre unit bears to the

-2-

Case No. 757

Order No. R-540-A

standard or orthodox proration unit for
said pool, all until further order of the
Commission."

IT IS FURTHER ORDERED: That the corrections and changes set
forth in this order be entered nunc pro tunc in the original order as of
November 17, 1954, the date of said original order.

DONE at Santa Fe, New Mexico, on this 13th day of January,
1955.

STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION

John F. Simms

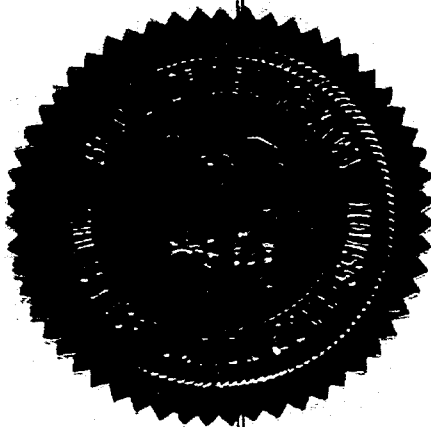
JOHN F. SIMMS, Chairman

E. S. Walker

E. S. WALKER, Member

W. B. Macey

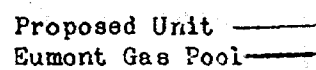
W. B. MACEY, Member and Secretary



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EXHIBIT No. CASE No.



BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION OF THE STATE OF NEW
MEXICO FOR THE PURPOSE OF CON-
SIDERING:

CASE NO. 757
Order No. R-540

THE APPLICATION OF SKELLY OIL COMPANY
FOR AN ORDER GRANTING APPROVAL OF AN
EXCEPTION PURSUANT TO RULE 5 (b) EUMONT
ORDER NO. R-520 IN ESTABLISHMENT OF AN
UNORTHODOX GAS PRORATION UNIT OF 320
CONTIGUOUS ACRES CONSISTING OF SE/4 AND
LOTS 9, 10, 15 AND 16 OF SECTION 2, TOWNSHIP
21 SOUTH, RANGE 35 EAST, NMPM, LEA COUNTY,
NEW MEXICO, LOCATED PARTIALLY WITHIN THE
HORIZONTAL LIMITS OF THE EUMONT GAS POOL;
AND FURTHER, GRANTING APPROVAL OF AN
EXCEPTION TO RULE (2) (EUMONT) OF ORDER NO.
R-520-B, FOR AN UNORTHODOX LOCATION FOR ITS
MEXICO "W", WELL NO. 1, LOCATED 660' FROM THE
SOUTH LINE AND 660' FROM THE EAST LINE OF
SECTION 2, TOWNSHIP 21 SOUTH, RANGE 35 EAST.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 o'clock a.m., on October 20, 1954, at Hobbs, New Mexico, before the Oil Conservation Commission, hereinafter referred to as the "Commission".

NOW, on this 17th day of November, 1954, the Commission, a quorum being present, having considered the records and testimony adduced, and being fully advised in the premises;

FINDS:

- (1) That due notice of the time and place of hearing and the purpose thereof having been given as required by law, the Commission has jurisdiction of this case and the subject matter thereof.
- (2) That pursuant to provisions of Rule 5 (b) (Eumont) of Order No. R-520, the Commission has power and authority to permit the formation of a gas proration unit consisting of other than a legal quarter section after notice and hearing by the Commission.
- (3) That applicant, Skelly Oil Company, is the owner of an oil and gas lease in Lea County, New Mexico the land consisting of other than a legal section, and described as follows, to-wit:

TOWNSHIP 21 SOUTH, RANGE 35 EAST, NMPM
SE/4 and Lots 9, 10, 15 and 16 of Section 2

containing 320 acres, more or less, and lying partially within the horizontal limits of the Eumont Gas Pool.

(4) That the entire 320 acres of said lease is productive of gas from the Eumont Gas Pool.

(5) That applicant, Skelly Oil Company has a producing well on the aforesaid lease known as Skelly Mexico "W" Well No. 1, located 660' from the South line and 660' from the East line of Section 2, Township 21 South, Range 35 East.

(6) That the aforesaid well was completed and in production prior to August 16, 1954, the effective date of Order No. R-520, and is located within limits of the pool heretofore delineated and designated as the Eumont Gas Pool; that at the time said well was completed as a gas well producing from the Eumont Gas Pool, its location conformed to the spacing requirements then in effect.

(7) That it is impractical to pool applicant's said lease with adjoining acreage in the Eumont Gas Pool, and that the owners of adjoining acreage in said area have not objected to the formation of the proposed proration unit of 320 acres.

(8) That unless a proration unit consisting of applicant's aforesaid acreage is permitted, applicant will be deprived of the opportunity to recover its just and equitable share of the natural gas in the Eumont Gas Pool.

(9) That creation of a proration unit consisting of the aforesaid acreage will not cause but will prevent waste and will protect correlative rights.

IT IS THEREFORE ORDERED:

(1) That the application of Skelly Oil Company for approval of an unorthodox proration unit consisting of the following described acreage

TOWNSHIP 21 SOUTH, RANGE 35 EAST, NMPM
SE/4 and Lots 9, 10, 15 and 16 of Section 2

is hereby approved, and a proration unit consisting of aforesaid acreage is hereby created.

(2) That applicant's well, Mexico "W" Well No. 1, located in the SE/4 of Section 2, Township 21 South, Range 35 East, NMPM, shall be granted an allowable from January 1, 1954 in the proportion that the above described 320-acre unit bears to the standard or orthodox proration unit for said pool, all until further order of the Commission.

DONE at Santa Fe, New Mexico, the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION

E. L. Mecham
EDWIN L. MECHEM, Chairman

E. S. Walker
E. S. WALKER, Member

W. B. Macey
W. B. MACEY, Secretary and Member



BEFORE THE

Oil Conservation Commission

SANTA FE, NEW MEXICO
Hobbs, New Mexico
October 20, 1954

IN THE MATTER OF:

CASE NO. 757 - Regular Hearing

TRANSCRIPT OF PROCEEDINGS

ADA DEARNLEY AND ASSOCIATES

COURT REPORTERS

ROOMS 105, 106, 107 EL CORTEZ BUILDING

TELEPHONE 7-9546

ALBUQUERQUE, NEW MEXICO

BEFORE THE
OIL CONSERVATION COMMISSION
Hobbs, New Mexico
October 20, 1954

IN THE MATTER OF:

Application of Skelly Oil Company for
approval of a 320-acre unorthodox gas
proration unit in the Eumont Gas Pool
consisting of the SE/4 and Lots 9, 10,
15 and 16 of Section 2, Township 21
South, Range 35 East; and for approval
of an unorthodox location for its
Mexico 'W' Well No. 1, 660 feet from
the S and E lines of Section 2.

Case No. 757

BEFORE:

Honorable Edwin L. Mechem
Mr. E. S. (Johnny) Walker
Mr. William B. Macey

TRANSCRIPT OF HEARING

MR. MACEY: The next case on the docket is Case 757. Mr.
Selinger?

(Marked Exhibits 1, 2 and 3,
for identification.)

MAX E. CURRY,

called as a witness, having been first duly sworn, testified as
follows:

DIRECT EXAMINATION

By MR. SELINGER:

Q State your name.

A Max E. Curry.

Q You are with Skelly Oil Company?

A I am.

Q In what capacity?

A As Petroleum Engineer.

Q Where are you stationed?

A Here in Hobbs, New Mexico.

Q Are you familiar with the Skelly Oil Company's Mexico 'W' No. 1 Well in Section 2, Township 21 South, Range 35 East?

A I am.

Q I will hand you what has been designated as Skelly Exhibit 1, is that a plat of the area surrounding the well?

A This is the plat showing the section of the surrounding acreage and wells around this Mexico 'W' Well, as well as a structure contour map drawn on the top of the Yates Formation.

Q Now, the area outlined in yellow is the 320 acres sought to be assigned to the well for gas proration purposes in the Eumont Gas Pool, is that correct?

A That is correct.

Q What is that red line indicated on that exhibit?

A The red line shows the ~~present~~ horizontal limits of the Eumont Gas Pool as it is presently designated by the Commission.

Q As indicated by Exhibit 2, the well was drilled for the purposes of seeking oil, is that right?

A That is correct.

Q And the log, as shown by Skelly's Exhibit 3 indicates the completion data on the well?

A That is correct.

Q The exception your are seeking is one for the location of the well and also the assignment of 320 acres to the proration unit, is that correct?

A That is correct.

Q Are there gas wells surrounding the 320 acre exception, sought to be secured in this particular instance?

A There is one, true, singly completed gas well directly south of Skelly's Mexico 'W' No. 1 Well. Then, there are several off-setting wells that have been dually completed as gas wells.

Q In your opinion, is the entire 320 acres productive of gas in the Eumont Gas Pool?

A Based upon the structure, the contour map, as shown in Exhibit 1, and the surrounding gas wells, yes, I do believe the entire acreage is productive of gas.

MR. SELINGER: That is all we have of this witness. We would like to offer Skelly Exhibits 1, 2 and 3.

MR. MACEY: Is there objection to the introduction of these Exhibits? If not they will be received in evidence. Any questions of the witness? If not the witness may be excused.

(Witness excused.)

MR. MACEY: We will take the case under advisement. Mr. Selinger, your application did not include the extension of the pool boundary, did it?

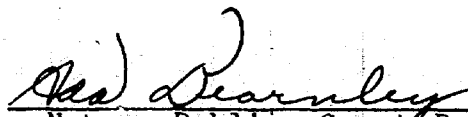
MR. SELINGER: No, it did not. There is a gas well, as you can see from Exhibit 1, extremely north that has been placed in the Eumont Field. We presume that the Commission has, on its own volition, extended the field, at least the allowables are on that basis.

MR. MACEY: All right.

STATE OF NEW MEXICO)
COUNTY OF BERNALILLO) SS.

I, ADA DEARNLEY, Court Reporter, do hereby certify that the foregoing and attached transcript of proceedings before the New Mexico Oil Conservation Commission at Hobbs, New Mexico, is a true and correct record to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have affixed my hand and notarial seal this 2nd day of November, 1954.


Notary Public, Court Reporter

My Commission Expires:
June 19, 1955

SKELLY OIL COMPANY
Mexico "W" Lease, Well No. 1
660' FS&EL Sec. 2, T21S, R35E.
Lea County, New Mexico

COMPLETION DATA

Skelly Oil Company's Mexico "W" well No. 1, located 660' from each the South and East lines of the lease and section was completed June 14, 1954. Connection was obtained from Permian Basin Pipeline Company August 11, 1954.

The well was drilled to a total depth of 4065' in the Seven Rivers formation. 7" OD casing was set at 3810' and the plug drilled out to 3890'. The open hole interval 3810 - 3890' was acidized with 30 gallons acid ahead of a 10,000 gallon Sandoil treatment. Well never produced all of load oil, but was water free.

Well plugged back to 3800' with Model "N" Baker bridging plug with Calseal plug from 3800 - 3793'. The well was perforated from 3728 - 3738' and the perforations treated with 6000 gallons Sandfrac. These perforations tested at 5,510 MOFPD @ 125 psi back pressure.

The well was then perforated from 3676 - 3690' and treated with 6000 gallons Sandfrac. This zone tested at 2,000 MOFPD.

Both perforated intervals listed above are now open and the 72 hour shut in tubing pressure is 1027.2 psia.

*Skelly Ex 2
Case 757*

SKELLY OIL COMPANY
Mexico "W" Lease, Well No. 1
660' FS&EL Sec. 2, T21S, R35E.
Lea County, New Mexico

COMPLETION DATA

Skelly Oil Company's Mexico "W" well No. 1, located 660' from each the South and East lines of the lease and section was completed June 14, 1954. Connection was obtained from Permian Basin Pipeline Company August 11, 1954.

The well was drilled to a total depth of 4065' in the Seven Rivers formation. 7" OD casing was set at 3810' and the plug drilled out to 3890'. The open hole interval 3810 - 3890' was acidized with 30 gallons acid ahead of a 10,000 gallon Sandoil treatment. Well never produced all of load oil, but was water free.

Well plugged back to 3800' with Model "N" Baker bridging plug with Calseal plug from 3800 - 3793'. The well was perforated from 3728 - 3738' and the perforations treated with 6000 gallons Sandfrac. These perforations tested at 5,510 MCFPD @ 125 psi back pressure.

The well was then perforated from 3676 - 3690' and treated with 6000 gallons Sandfrac. This zone tested at 2,000 MCFPD.

Both perforated intervals listed above are now open and the 72 hour shut in tubing pressure is 1027.2 psia.

*Skelly Ex 2
Case 757*

BEFORE THE
Oil Conservation Commission
SANTA FE, NEW MEXICO
September 16, 1954

IN THE MATTER OF:
Regular Hearing
CASE NO. 757

TRANSCRIPT OF PROCEEDINGS

ADA DEARNLEY AND ASSOCIATES
COURT REPORTERS
ROOMS 105, 106, 107 EL CORTEZ BUILDING
TELEPHONE 7-9546
ALBUQUERQUE, NEW MEXICO

BEFORE THE
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
September 16, 1954

IN THE MATTER OF:

Application of Skelly Oil Company for approval
of a 320-acre unorthodox gas unit in the Eumont
Gas Pool consisting of the SE/4 and Lots 9, 10,
15 and 16 of Section 2, Township 21 South,
Range 35 East; and for approval of an unorthodox
location for its Mexico 'W', Well No. 1, 660
feet from the south and east lines of Section 2.

Case No.
757

BEFORE:

Honorable Edwin L. Mechem
Mr. E. S. (Johnny) Walker
Mr. William B. Macey

TRANSCRIPT OF HEARING

MR. MACEY: The meeting will come to order, please. Next case on the docket is Case 757. I have a letter here from Mr. George W. Selinger, Skelly Oil Company, addressed to the Commission. I will read it into the record.

"With respect to our application for approval of a 320-acre unorthodox unit for Case 757, which is set for hearing Thursday, September 16, 1954, we respectively request this case be continued to the October 20th hearing."

Is there objection to the continuance of this case to the October 20th hearing? If not the case will be continued to October 20th.

STATE OF NEW MEXICO)
: ss.
COUNTY OF BERNALILLO)

I, MARIANNA MEIER, Court Reporter, do hereby
certify that the foregoing and attached transcript of proceedings
before the New Mexico Oil Conservation Commission at Santa Fe,
New Mexico, is a true and correct record to the best of my
knowledge, skill and ability.

IN WITNESS WHEREOF I have affixed my hand and notarial
seal this 23rd day of September, 1954.

Notary Public, Court Reporter

My Commission Expires:
April 8, 1956

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Legal Notice OCC Hearing

Publication:

Date: Sept 16 1954

CASE 757 :

In the matter of the application of Skelly
Oil Company for an unorthodox gas proration unit.

Applicant, in the above-styled cause, seeks an order authorizing the formation of a 320-acre unorthodox gas proration unit consisting of the SE/4 and Lots 9, 10, 15 and 16 of Section 2, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico, as an exception to provisions of Rule 5 of the Special Rules and Regulations for the Eumont Gas Pool as set forth in Order R-520 ; and further, for approval of an unorthodox location for its Mexico W. No. 1, located 660' from the South line and 660' feet from the EAST line of Section 2, Township 21 South, Range 35 East, in exception to Rule 2 of said Order R-520.

CLASS OF SERVICE
 This is a full-rate Telegram or Cablegram unless its deferred character is indicated by a suitable symbol above or preceding the address.

WESTERN UNION

1201

SYMBOLS	
DL	Day Letter
NL	Night Letter
LT	Int'l Letter Telegram
VLT	Int'l Victory Ltr.

W. P. MARSHALL, PRESIDENT

The filing time is: LA35 SSA1 35 and day: Here is STANDARD TIME at point of origin. Time of receipt is STANDARD TIME at point of destination.

L-HRA010 PD=HOBBS NMEX 30 835AMM=

OTL CONSERVATION COMMTSSON=

SANTA FE NMEX=

1954 AUG 30 AM 8 49

Case 757

ATTN W B MACEY. IN THE MATTER OF APPLTCATION OF SKELLY OTL COMPANY FOR APPROVAL OF AN UNORTHODOXED WELL LOCATTON ON A NON STANDARD 320 ACRE UNIT COMPCSTNG THE SE1/4 IN LOTS 9 10 15 AND 16 SECTION 2 TOWNSHTP 21S RANGE 35E TN THE EUMONT GAS POOL LEA COUNTY NEW MEXICO=

SKELLY OTL CO J N DUNLAVEY=

1954 AUG 30 AM 9 03

MAIN OFFICE OCC

320 SE1/4 9 10 15 16 2 21S 35E=

FROM ITS PATRONS CONCERNING ITS SERVICE



MAIN OFFICE OCC

1954 **SKELLY OIL COMPANY**

PRODUCTION DEPARTMENT

J. S. FREEMAN
VICE PRESIDENT

TULSA 2, OKLAHOMA

September 13, 1954

W. P. WHITMORE
CHIEF PETROLEUM ENGINEER
G. W. SELINGER
PRORATION ATTORNEY
J. H. McCULLOCH
CHIEF CLERK

Re: Case No. 757

Mr. W. B. Macey
New Mexico Oil Conservation Commission
State Capitol Building
Santa Fe, New Mexico

Gentlemen:

With respect to our application for approval of a 320 acre unorthodox unit and location for our Mexico "W" Well No. 1 in Case No. 757 which is set for hearing Thursday, September 16, 1954, we respectfully request that this case be continued to the October 20 hearings.

Yours very truly,

George W. Selinger
George W. Selinger

GWS:dd

cc: Mr. J. N. Dunlavey

OIL CONSERVATION COMMISSION

P. O. BOX 871

SANTA FE, NEW MEXICO

November 23, 1954

Mr. J. M. Dunlavy
Skelly Oil Company
Box 38
ROSEM, NEW MEXICO

Dear Sir:

We enclose copy of Order R-540 issued by the Commission on November 17, 1954, in Case 757, heard on October 20, 1954, upon application of Skelly Oil Company.

Very truly yours,

W. B. Macey
Secretary - Director

WBM:mr

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SKELLY OIL COMPANY

Case 787

Box 38, Hobbs, New Mexico

MAIN OFF.

August 30, 1954

1954 AUG 1

New Mexico Oil Conservation Commission
State of New Mexico
Santa Fe, New Mexico

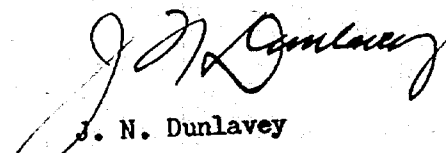
Atten: Mr. W. B. Macey, Secretary Director

Gentlemen:

In behalf of Skelly Oil Company if is requested that the attached petition be placed on the docket for the regular September hearing.

Yours very truly,

SKELLY OIL COMPANY


J. N. Dunlavey

JND:MEC:m

Encl.

OIL CONSERVATION COMMISSION
STATE OF NEW MEXICO
SANTA FE, NEW MEXICO

RE: IN THE MATTER OF APPLICATION OF SKELLY
OIL COMPANY FOR APPROVAL OF AN UNORTHODOX
WELL LOCATION ON A NON-STANDARD 320 ACRE
UNIT COMPRISING THE SE¹ AND LOTS 9, 10,
15 AND 16, SECTION 2, TOWNSHIP 21 SOUTH,
RANGE 35 EAST, IN THE EUMONT GAS POOL, LEA
COUNTY, NEW MEXICO.

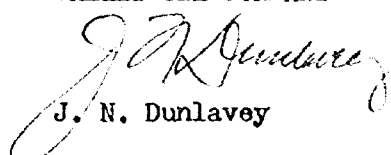
GENTLEMEN:

Comes now SKELLY OIL COMPANY, a Delaware corporation with offices in Tulsa, Oklahoma and Hobbs, New Mexico, hereby petitioning the New Mexico Oil Conservation Commission for approval of an unorthodox well location on a non-standard 320-acre unit lying partially within the horizontal limits of the Eumont Gas Pool, Lea County, New Mexico, and in support thereof does state:

1. That the petitioner is the sole owner of all oil and gas leases held on the 320 acres confined by the boundaries of SE¹ and lots 9, 10, 15 and 16 of Section 2, Township 21 South, Range 35 East, N.M.P.M., Lea County, New Mexico, and concerns but a single royalty owner, namely, the State of New Mexico.
2. That the petitioner's Mexico "W" well No. 1 is located 660' from the South boundary and 660' from the East boundary of the lease and section and is completed entirely within the vertical limits of the Eumont Gas Pool as defined by the New Mexico Oil Conservation Commission.
3. That the petitioner's lease is capable of production by virtue of its production history, offset production, and its structural position as indicated by contour lines on attached plat.
4. That petitioner's well was originally drilled to and completed in the Eunice-Monument Oil Pool prior to the effective date of Order No. R-520. After a diligent effort to complete the well as a commercial producer of oil from this pool, the well was abandoned in this zone, plugged back in conformance with existing Commission Rules and Regulations, and recompleted as a gas producer in the Yates section of the Eumont Gas Pool.
5. That all lands described above, and contained within the limits of the proposed proration unit, are contiguous and lie within the limits of a single legal subdivision (section) of the U. S. Public Land Survey.
6. That a plat showing the above described lands and all offset properties indicating well locations and lease ownership to the best of our knowledge is hereto attached.
7. That a radioactive log, complete with well information and completion data, is hereto attached.
8. That one gas well can efficiently drain as much as 320 acres in the Eumont Gas Pool; therefore, the approval of this petition will prevent the drilling of an unnecessary well, thus preventing economic waste.

Wherefore, the petitioner requests that, in the interest of conservation and protection of correlative rights, the Commission grant an exception to Rule 5(a), Order No. R-520, after proper notice and hearing, by which the petitioner may operate the above described lands as a single unit.

Respectfully submitted
SKELLY OIL COMPANY


J. N. Dunlavey