Case No. 1219 Replication, Transcript, Smill Exhibits, Etc.

BEFORE THE OIL CONSERVATION COMMISSION Santa Fe, New Mexico March 14, 1957	
TRANSCRIPT OF HEARING	
Case No. 1219	
DEARNLEY - MEIER & ASSOCIATES NUDBROHATED GENERAL LAW REPORTEP ALBUGUERQUE SANTE FE 3-5601 2-2211	

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BEFORE THE OIL CONSERVATION COMMISSION Santa Fe, New Mexico March 14, 1957	
IN THE MATTER OF:	
Application of Amerada Petroleum Corporation for a 440-acre non-standard gas proration unit in the Justis Gas Pool in exception to Rule 5 (a) of the Special Rules and Regulations for said pool as set forth in Commission Orders R-586 and R-586-A. Applicant, in the above-styled cause, seeks an or- der authorizing a 440-acre non-standard gas prora- lin unit in the Justis Gas Pool consisting of the W/2 SW/4 of Section 24, the N/2 of Section 25, and the NE/4 NE/4 of Section 26, all in Township 25 South, Range 37 East, Lea County, New Mexico; said unit to be dedicated to a well to be drilled at a point 990 feet from the North line and 1650 feet from the West line of said Section 25.	
BEFORE: Honorable Edwin L. Mechem Mr. A. L. Porter Mr. Murray Morgan	
TRANSCRIPT OF HEARING	
MR. PORTER: The next case to be considered will be Case	
1219.	
MR. COOLEY: Application of Amerada Petroleum Corporation	
for a 440-acre non-standard gur provation unit in the Justis Gas	
Pool in exception to Rule 5 (a) of the Special Rules and Regulatio	ns
for said pool as set forth in Commission Orders H-586 and R-586-A.	
JOHN VEBUER	
called as a witness, having been first duly sworn, testified to follows:	
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3 DIRECT EX INATION By MR. BUSHNELL: Q Would you state year tome and company for which you are employed? A John Veeder, Amerada Petroleum Corporation. Q In what capacity are you employed? A District Geologist. Q You are District Geologist of the Midland area office. is that correct? A That is right. (Marked Amerada's Exhibit No. 1. for identification.) Q I hand you what is marked as Exhibit No. 1. Will you identify this exhibit, please? A This is a subsurface structure map of the Justis Gas Pool in southeastern Lea County, New Mexico. This map is contoured on a marker near the top of the Yates with a contour interval of twenty-five feet. Q What do these contour lines purport to show with reference to the Paddock zone? A They would show relatively the structure of the Paddock zone. Q Now, on this exhibit there are seven wells, is that not correct, outlined or noted with red circles? A That is right. Q Is it not true that those seven wells are the wells now

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producing from the Justis Gas Pool? A That is right.	
Q Also on this plat is an area outlined in red. Would you	
state what that area represents?	
A That area outlined in red is the proposed gas unit for a	
well to be drilled within that unit for gas production in the Just	is
Gas Pool.	
Q That unit contains a total of how many acres?	
A Four hundred forty acres.	
Q Would you identify and locate on this exhibit the three	
gas wells on the tracts adjacent to the area outlined in red, now	
completed in the Justis Gas Pool?	
A Those wells are the Olsen No. 1 Wimberly, which is located	
in the southeast of the northeast of Section 23, the Widewater No.	
1 Coats C, which is located in the southeast of the northwest of	
Section 24, and the El Paso No. 1 Carlson A which is located in	
the northwest of the southeast of Section 25. All of these sectio	ns
being in Township 25 South, Range 37 East.	
Q Now, Mr. Veeder, on the basis of your study in this area,	

and also on the basis of the information contained on this exhibit, in your opinion does the Justis Gas Pool substantially underlie all the 440 acres outlined in red on this exhibit?

A I would say that acreage is very well located structurally.

MR. BUSHNELL: That is all the questions I have of this witness.

MR. PURTER: Anyone else have a question	of Mr. Veeder?
Mr. Mankin.	
CROSS EXAMINATION	
By MR. MANKIN:	
Q Mr. Veeder, this structure map which you	have prepared is
on the Yates. The production which you anticipat	te to get from the
well to be drilled will be from the Glorieta zon	ne, is that correct
A Well, it's the Glorieta, or you could ca	all it the Inter-
mediate.	
Q Call it the what, please?	
A The Intermediate. That is the section	between the San
Andres and the Clear Fork.	
Q Do you have another name for it than Glo	orieta?
A It is often-times referred to as Paddoc	<b>K</b> .
Q Are all the wells completed in the Just	is Pool from the sam
zone?	
A They are completed from this section be	tween the base of
the San Andres and the Clear Fork. I would not	say they are pro-
ducing from the same reservoir.	
Q In some cases they may be what, termed	Glorieta and some
cases might be termed Paddock?	
A I think that is loose terminology, but	they are two zones
in that section.	
Q This well has not yet been drilled, has	it?
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6 A No. it has not. Q There is numerous wells surrounding this proposed well, that is numerous gas wells producing from another pay, is that correct? A That is right. Q Is that pay the Langley-Mattix pay? A That is including the Langley-Mattix. Q Which is predominantly the Queen pay? A Right. Q Bo you have knowledge that the wells in the Justis Pools are normally prolific producers? A On potential, they had very good potentials. Q Do you have any knowledge as to the area which one well will drain? MR. BUSHNELL: I think, Mr. Mankin, that we have another witness to testify to that. MR. MANKIN: As to the drainage area? MR. BUSHNELL: Yes. MR. MANKIN: That's all. MR. PORTER: Anyone else have a question? The witness may be excused. (Witness excused.) MR. BUSHNELL: I would like to offer this exhibit in evidence. I would like to ask the witness one other question, if it is not true this was prepared by you or under your supervision? DEADT EY MEERIA AGSCORATEG

7 A That is right. MR. PORTER: Without objection the exhibit will be received. (Witness excused.) R. S. CHRISTIE a witness, having been first duly sworn, testified as follows: DIRECT EXAMINATION By MR. BUSHNELL: Q State your name and the company for which you are employed, A R. S. Christie, Amerada. A Petroleum Engineer. Q In what capacity? Q Have you, as a witness, testified as a Petroleum Engineer before this Commission on prior hearings? A Yes, 1 have. Q Mr. Christie. I hand you what is marked Exhibit No. 2. Would you identify this exhibit, please? A Exhibit No. 2 is a plat showing the Amerada Atlantic Wimberly, the proposed Wimberly Gas Unit, the proposed 440 acre unit as cutlined in red, and the other unit wells surrounding this area are outlined in green. In addition to that, the outlines of the Justis Gas Pool are shown in a hashed manner. Q This plat was prepared by you or under your supervision, is A Yes, sir. that not correct? Q You have already testified that the area outlined in green represent the units from which the three respective wells are

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producing in	this metered	area, is that	correct?
A Vas	sir		

Q Would you locate and identify on this plat the proposed location of Amerada's well in the area outlined in red? 8

A We propose to drill our Wimberly No. 3, which is located 990 from the north line and 1980 feet from the west line, Section 25, Township 25 south, Range 37 east.

Q You have made a study of the reservoir conditions and the characteristics of the sand in this immediate area, is that correct?

A Yes, sir.

Q From your study, is it your opinion that one well will drain the 440 acres outlined in this red area?

A In my opinion I believe it will.

Q What facts are you using as a basis for reaching this conclusion?

A Unfortunately we have very little reservoir information in this particular area, and since we haven't drilled our own well, we had to use other information from other sources. Not knowing what the exact porosity, permeability and so forth are underneath this tract, I have used an alternate method of attempting to determine what the drainage area might be.

We have assumed, or it's actually not an assumption, we have estimated that the average pay thickness underneath this tract is twenty feet of net effective pay. We have used a percent porosity

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9 of eight and a half, which is the porosity based on an analysis of the Paddock in the Monument Pool, which is to the northwest of the Justis Pool. We have used the percent saturation, water saturation of twenty percent, and have arrived at a recoverable gas reserve down to a pressure of 200 pounds of 7,000 M.C.F. per acre. Using those figures and taking the Olsen Oil Company Wimberly No. Well as an example, since we have production history on it and it has produced the most gas of any gas well in the pool, we have calculated from an original bottomhole pressure of 2,050 pounds, and the present bottomhole pressure of 1850 pounds with an accumulative production of 1,896,896 M.C.F. of gas that the gas originally in place was 403.3 M.C.F. per acre foot.

The gas now remaining under these conditions is 364.2 M.C.F. per acre foot. Therefore using these figures, we can calculate mathematically that the area being drained is 48,514 acre feet, or converted into acres, using the twenty foot pay thickness, would give a total of 2425 acres that this one well is draining. That is the Olsen Wimberly No. 1.

Now there is some question of the accuracy of that because we believe this is a water drive field and if that is true, then those figures are probably not too reliable, but we can arrive at a figure, another way. At the present time, as I have stated, the Olsen Wimberly has recovered 1,896,896 M.C.F. of gas, which represents complete drainage of 271 acres. In other words, there was

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10 that much gas being produced it would contain a volume of 271 acres. If we assume some sort of depletion, some percentage of depletion, we can arrive at some reasonable figures I think of the drainage at the present time. If we assume a well is 25 percent depleted and that is probably not, if anything is a high figure based on the total drop in pressure which has only been 150 pounds, it will only recover 7,787,000 M.C.F. of gas, and will have drained over 1,000 acres.

If a well is now 50 percent depleted, the ultimate recovery will total twice as much as it has produced, or 3,793,792 M.C.F. of gas, which gives a drainage area of over 540 acres. Of course, we know the field, or this particular well, is not 75 percent depleted, but if it were you would still get an area of 361 acres. So based on those calculations it is my opinion that one well in this area will efficiently and effectively drain at least 440 acres.

We have also used the same calculations in determining the area drained by the other wells in the field. I will mention the three other largest producers, that is the El Paso Justis No. 1 which had produced 1,685,000 M.C.F., has drained to the present time, or 1,157,241 acres. The Western Natural E 10-E No. 1 which has produced, incidently this is a correction in a statement I made earlier, this is the well that has produced the maximum amount of gas in the field rather than the Olsen Wimberly. It has produced 2,291,823 M.C.F., and has drained on that basis 427 acres.

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Q Now, Mr. Christie, referring to this plat, we find that there is 120 acre tract owned by Atlantic in the northeast of 25, is that correct? A Yes, sir.

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Q And that Amerada owns the northwest quarter of Section 25 and the southwest of the northeast of 25. It is my understanding now that Atlantic and Amerada have been entering into negotiations concerning the development of these two tracts. Would you state what those negotiations are, what prompted them?

A It was the feeling, both Atlantic and Amerada, that the 120 acre Atlantic tract would not support a well on it's own, that is it would not be an economical, attractive proposition. As to the 200 acres in that section that Amerada owns, while a well on that would pay out, it still wouldn't be real attractive, economical proposition, so it was decided that Atlantic and Amerada, if they could come to some agreement and unitize those two tracts, that one well would efficiently drain it and be a profitable venture.

Q Now, referring to the Amerada tract within the area outlined in red described as the west half of the southwest quarter of Section 24 and containing 80 acres, and also referring to the 40 acres in the red outlined area which is described as the northeast 40 of the northeast of Section 26, in your opinion would it be economical for Amerada to drill either of these two tracts separately? A No, sir, it would not.

In your opinion do the three wells located on this plat and

DEARNUEY MEIER & ASSOCIATES No reposition Consistence and Reports Allow Based on Angle Pronow producing from the Justis Gas Pool drain acreage outlined in red?

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A Yes they do, even if you assume 160 acre radius of drainage, all three wells are draining from the area outlined in red. Of course, if you use the figures that I have put into the record that the wells have actually drained, then they would have drained quite a larger area than the 160 acres.

Q Now, in your opinion, will the proposed Amerada well, if allocated 440 acres, drain acreage adjacent to the area outlined in red?

A Well, if you assume the drainage radius theory, of course you will drain some gas from offset properties and will not entirely drain entirely all your own property.

Q Assuming that is true, in your opinion is the acreage from Amerada's or the tract underlined in red that is now being drained, would the proposed well, Amerada well, counter drain any excess acreage from the adjacent tracts?

A No, sir, it wouldn't insofar as there are only 440 acres in the tract outlined in red and there are a total of 480 in the other three tracts, we would still lack 40 acres of having counter drainage equalized.

Q And such counter drainage would be substantially the same?

A Yes, sir.

Q Mr. Christie, in your opinion will the formation of the 440

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<pre>area, impair the rights of owners in this pool? A No, sir. Q Is it not your opinion that the formation of this 440 a unit is necessary to protect the rights of owners in the area o lined in red? A Yes, sir, it is my opinion. MR. BUSHNELL: That is all the questions I have of this witness at this time. MR. PORTER: Before we start cross examination, suppose we recess until one-fifteen. (Recess.) MR. PORTER: The meeting will come to order, please. Does anyone have a question of Mr. Christie? MR. WOODWARD: Mr. Woodward, El Paso Natural Gas has so questions on cross examination. <u>CROSS EXAMINATION</u> By <u>MR. WOODWARD</u>: Q Nr. Christie, no interference tests have been taken in Justis Field, is that your understanding? A None by us at least. 1 know of no interference cest. Q Have you seen any analysis on cores taken from the Just Field? A Non, sir. Q In your opinion as to the area to be drained by one well </pre>		nt based on your prior testimony and your study of this
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14 in this pool is based on a computation, is that correct? A Yes, sir. In addition to that, which I didn't mention, the degree of potential reflects permeability, and therefore a drained area. Q The degree of potential? A Yes. Q From what source was that drawn? A Your potential tests are usually taken at completion, and the relative volume of your open flow potential indicates the capacity of the well to produce, and in a measure indicates the permeability. Q They were taken from wells in the Justis Pool? A Yes, sir. Q What wells were those, would you indicate that? A The information that I have, for example, the El Paso No. 1-A Carlson Federal, Section 25, has an open flow potential of 7,800,000. Q Now, the rest of the factors that go into this computation are porosity and net pay thickness? A Yes, sir.  $\mathbb{Q}$  What was the source of your information on porosities? A We used a porosity that was obtained in the Paddock Zone in the Monument Field. Q Approximately how far is the well from which that information was obtained, how far is that well from the tract in question? A Oh. I don't know exactly, it's several miles. DEARNLEY MEIER & ASSOCIATES ACHIQUERQUE SANIEFE 3.6691 2.2211

15 Q Now, the porosity information obtained on a well in the Monument Pool was combined with an estimate of thickness under this tract, is that correct? A Yes. sir. The thickness estimate wasn't necessarily an estimate, it was an actual determination from logs. A Yes. sir. Q Logs of other wells? Q That are not completed on this tract? A Yes. sir. Q I wish you would again describe how you determined the drainage area by the use of these factors. A Calculated the gas originally in place by using twenty foot thickness porosity of 8.5 percent, and water saturation of twenty percent and found that to be 403.3 M.C.F. per acre foot. That's the gas originally in place. Now, taking the drop in pressure from the original of 2,050 and the present of 1850, calculate the gas now in place. That calculates to be 364.2 M.C.F. per acre foot. Then the difference between what was there originally and what you produced divided into the amount you have produced, gives you the number of acre feet. That's the area being drained. Then the area being twenty feet thick, you come out with 2425 acres under that first calculation. That's assuming besides

not a very accurate calculation.

Q Now, the validity of that type of calculation depends to

that there is a possibility you have a water drive there and that's

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		1
	some extent upon your estimate of the reserves in place per acre	16
	does it not? A Oh, yes.	
	Q How did you arrive at what is in place per acre now?	
	A Well, you take your area, your thickness, your porosity,	
	and your bottomhole pressure, temperature and calculate it.	
	Q That would tell you what you could expect to be in place	
	originally, but how do you determine what percentage of that is	
	still in place now?	
	A Well, if you calculate how much you had originally and how	
	much you have now, it is just a matter of dividing one percentage	
	to get your percentage.	
	Q Well now, if the production that has been taken out of the	
	ground is removed from a relatively small area, you would have a	
	proportionate decrease in the amount in place. If it is taken out	
	from a larger area, there would be a relatively small decrease, is	
	that not correct? A Yes, that is right.	
	Q How do you determine which of those two conditions exist	
	in this field?	
	A Well, I have just gone through the calculations.	
	$\mathbb{Q}$ Does that calculation not rest upon an assumption?	
	A Well, we have assumed a porosity percent, about the only	
	assumption, and the water saturation.	
	Q Does it not rest on an assumption as to what is in place	
~	in order to determine how far the drainage has occurred? What is	ļ
	THE ARM FOR MARK ROBACTION AND THE ARM OF A ROBACTION AND AND AN ARM OF FER ALBORIST SALTEFE SOCIO	

## now in place?

A Well, I'm not calculating the total gas in the reservoir. I'm breaking it down to an acre basis.

Q Let me put the question this way, how do you tell whether the amount of gas withdrawn has come from 160 acres or from some larger area?

A If you know how much you had there originally and how much you took out, and you know your area, it is a simple mathematics to tell whetner you have produced more than 160 acres will contain or less.

Q In this case that you are using, have you produced a sufficient volume to have depleted all of the gas in place under 160 acres? A No, sir.

Q How then do you determine what percentage you have left?

A Well, based on your calculations from your present bottomhole pressure.

Q Would you explain how that works?

A Well, I just indicated awhile ago that your gas now in place is determined from your area times your porosity and saturation and your bottomhole pressure and temperature.

Q But you had more in place under 160 acres than you have taken out of the ground to date, is that not true?

A Actually it is equalized which amounted to 7,000 M.C.F. per acre, based on 160 acres it would appear that the amount of

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~	gas originally in place under 160 acres based on these conditions	18
	would be 1,120,000 M.C.F. Therefore several of these wells have	
	produced more than was originally underneath 160 acre tract.	
	Q Several of these wells. I understood we were talking	
	about the Olsen Wimberly well.	
	A Well, the Olsen Wimberly well has	
	Q (Interrupting) It has produced how much to date?	
	A According to the figures of the Commission it has produced	
	to the first of the year, 1,896,896 M.C.F.	
	Q That well then has already produced more gas than you cal-	
	culate was in place initially, is that true?	
	A Yes, under 160 acres.	
	Q Now, what is the cost of these wells?	
	A We estimate the cost at $367,000$ to drill a well to the	
	Paddock Zone.	
	Q What reserve volume would you estimate is necessary to	
	make the drilling of that $367,000$ well commercially feasible?	
	A Based on the 1 billion 120 million that I originally cal-	
	culated was originally in place on 160, calculate the gross value	to -
	be $\downarrow$ 1,506 for 160 acres. Of course, you have to discount that ove	r
	the number of years, so that it wouldn't be, the present worth	
	wouldn't be not near that much.	
	$\mathbb{Q}$ Then in your opinion you would need at least 160 acres to	

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make the well a commercial investment?

DEARNLEY MEIER & ASSUCIATES A 399 JEARS CONTRACTOR DESCRIPTION A 2000 APRIL 2010 SANTE (F A 2000 APRIL 2010 APRIL 2010)

*	Yes, and it wouldn't be very profitable at that.
	MR. WOODWARD: I think that's all we have.
	MR. PORTER: Mr. Mankin.
D 10D	
	MANKIN:
	Mr. Christie, you have indicated previously that you had
	nalysis from the Paddock Zone in the Paddock Pool. Is that
-	proximately twenty-five miles away from this area?
	It could be that far away.
Q	Do you feel that the characteristics in the Justis area
are en	ough similar to the Paddock Zone in the Monument Pool to
compar	e them?
A	I think it would be, provide the set of these sets of
Q	You indicated that you had an aver the short the short
the Ju	stis of approximately twenty feet?
<u>A</u>	Under this area.
Q	Do you have any information as to what the a
thickne	ess might be in the Justis Pool? A No, sir.
Q	Do you have any knowledge of wells, particular
settin	g the proposed well which might le making consid
of wate	er in the Justic Cooly
A	I understand that the Westates Carlson Unit is r
but it	's probably coming from the lower Baddock and coul -
well sh	nut off.
2	You don't feel that that has any characteristi

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type of drive you mentioned you thought was a water drive? A I think it is indication that we probably do have a water drive.	20
A I think it is indication that we probably do have a water	
Q Do you feel that a large unit the size of which you are	:
At the present time the withdrawals are rather low for 160 acre	
units.	1
Q That's my next question, do you have any knowledge, I'm	
sure you must know what the present withdrawals are per 160 acres	
per day or per month, or do you have that?	1
A I don't have it available at this time.	1
Q Would you say it is a half a million a day or less?	
A I wouldn't want to give a figure. It can be casily ascer-	
tainable.	
Q Well, awhile ago you mentioned a potential of the Federal	
Carlson Well, did you not mean the Westates Petroleum Federal	
Carlson?	ļ
A Yes, that's the well I referred to. It was originally	1
Frilled by El Paso I believe, and carried by El Paso.	
	L
FREARMERT ET MERCOLA ANGULT A FERI International International International Albumgerer - Anternation	
	Q That's my next question, do you have any knowledge, I'm sure you must know what the present withdrawals are per 160 acres ber day or per month, or do you have that? A I don't have it available at this time. Q Would you say it is a half a million a day or less? A I wouldn't want to give a figure. It can be casily ascer- trainable. Q Well, awhile ago you mentioned a potential of the Federal Carlson Well, did you not mean the Westates Petroleum Federal Carlson? A Yes, that's the well I referred to. It was originally wrilled by 51 Paso I believe, and carried by 51 Paso. Q On your Exhibit No. 2 you showed three wells that had pororation units of 160 acres, is that not true, that 160 acres is the standard unit in this pool? A Yes, sir, it is.

Q	Is there any units at the present time larger than 160	
acres?	A None that I know of.	
•	Do you feel that one well will adequately be drained by	

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this 440 acre unit?

A Yes, I do. Of course, as I pointed out. this is rather an unusual situation. If the Atlantic and Amerada can not unitize that tract, Atlantic probably would feel like they couldn't afford to drill a well on the 120 acres. That would leave that out of the field as far as protection is concerned, and we certainly couldn't afford to drill a well on the 40 acres in the northeast quarter of 26, nor. on the 80 in the west half of the southwest quarter of 24, and that was the reason for taking all those different units across section lines to this particular unit. Of course, having 160 acres as a standard, you may not have a very good opportunity to join with some other operator who would then also have perhaps larger than 160 acre if he tried to unitize with some operator.

As far as the 40 in the northeast quarter of 26, it's our opinion that there is not 160 acres there that's productive.

Q I have only one other question. Has this well been started?

A No, sir. We are waiting for decision of the Commission as to the size of the unit. I think one reason we didn't choose to drill it if the Commission declined to give the 440, we may locate the well in a different position on the lease, different location.

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MR. MANKIN: Thank you.

	MR. PORTER: Anyone wise have a question of Mr. Christier	22
Mr. Coo		
By MR.		
Q	Mr. Christie, is there any indication that the acreage to	
the wes	t, northwest, southwest of your proposed well location	
would b	e possibly productive of gas from the Justis Gas Pool?	
A	I am sorry. I didn't understand your question.	
Q	Is the area to the west of the well, can it reasonably be	
anticip	ated to be productive from the Justis?	
A	We think so, yes.	
Q	You indicated in your mind on direct that you felt that	
you wer	e merely compensating for counter drainage. Would you	
indicat	e what wells on your Exhibit 2 that you feel is, constitutes	
this co	unter drainage?	
A	The Westates Carlson A-Nc. 1 located in the southeast	
quarter	of Section 25 which appears to be a 660 foot location I	
believe	or maybe nine - ninety from the northwest corner and the	
Olsen N	o. 1 Wimberly in the northeast quarter of Section 23 and	
Tidewat	er No. 1 Coats Federal in the northwest quarter of Section :	<b>2</b> 4.
Q	Then there is no counter drainage to the west or southwest	
of this	unit?	
A	No, sir. There is probably no production west.	
		í
Q	That was my initial question. Apparently you misunderstood	•

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## proposed location would be productive from the limits of the --

A (Interrupting) I thought you were talking about the acrease within the unit west of the location. No, it's our opinion that there is no production west of the proposed unit.

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Q Mr. Christie, concerning the ownership of the working interest and the royalty interest in the acreage outlined in red on Exhibit 2, obviously it is not common, is that correct?

A That is right.

- Q Has the acreage been communitized?
- A Not yet, no, sir.

Q How long would you estimate that a well would pay out on 160 acres at the present allowable? You estimated a figure of \$67,000 per well and a total of \$160,000 pay out. How long would it take you to get your total?

A Well, that would take a little calculation. You would have to know the price of the gas and your listed cost.

Q You must have known the price of the gas when you calculated the \$160,000.

A Yes, we used ten cents, I believe. You want to assume an allowable of 50,000.

Q That approximates present allowables that will be all right?

A Well, without any accurate calculation I would say possibly three or four years.

MR. COOLSY: Thank you. I believe that's all.

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MR. PORTER: Anyone else have a question of Mr. Christie?	
MR. BUSHNELL: May I ask one question?	
REDIRECT EXAMINATION	
By MR. BUSHNELL:	
Q To make sure there is no misunderstanding with Mr. Cooley!	5
question regarding the productive acreage or non productive acreag	e
to the west of the proposed well, as I understand your testimony,	
you are testifying that the acreage within the red lines is pro-	
ductive west of the proposed location, but that acreage west of th	e
proposed area may not be productive, is that correct?	
A That is correct.	
MR. BUSHNELL: That's all.	
MR. PORTER: Any further questions? The witness may be	
excused.	
(Witness excused.)	
MR. PORTER: Do you want to enter Exhibit No. 2?	
MR. BUSHNELL: Yes, I want to offer both Exhibits 1 and 2 i	f
there is no objection.	
MR. COOLEY: One has been entered.	
MR. BUSHNELL: You are right.	
MR. PORTER: Without objection Exhibit No. 2 will be ad-	
mitted. Any other witnesses in this case?	
MR. BUSHNELL: There are no other witnesses in this case.	
In the event there are any statements, I would like to reserve the DEARNLEY MELER & ASSOCIATES	2
GENERAL LAW REPORTENC ALBUQUERQUE - SANTEFE 3.603 201 - 2.2211	

right to answer any statements.

MR. PORTER: Anyone have a statement to make?

MR. WOODWARD: John Woodward representing El Paso Natural Gas Company and Westates Petroleum Corporation, pursuant to a letter that was sent to the Commission on March 8, 1957. El Paso owns the southwest quarter of Section 25, Township 25 south, Range 37 east, and we own 120 acres in the northeast quarter of Sections 26 immediately to the west and the south half of Section 23. We own jointly with Westates an interest in the southeast quarter of Section 25, a well has been completed on the southwest quarter of Section 25 and southeast and one is drilling on the southwest quarter of Section 25.

El Paso is very much in sympathy with the objective of the applicant in this case, that is to avoid the drilling of unnecessary wells and to attribute the maximum amount of acreage that can be officiently and economically drained by a well to wells in any pool. We have never subscribed to the "dog in the manger" whilosophy of after having perhaps drilled some unnecessary wells ourselves of requiring others to go and do likewise. However, we are objecting to this application on the basis of the method used in obtaining perhaps a very desireable result. As in our Crosby-Devonian case, Amerada is attempting to attribute acreage in excess of the proration unit established for the field. Unlike that application, they are seeking to do it by an exception rather than an

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## amendment to the field rules.

It is our position that such an exception is not authorized by the statute and is contrary to the findings of fact which preceded Order R-586 under which the exception is being sought. Section 65-5D14B provides that the Commission may establish a proration unit for each pool, such being the area that can be efficiently and economically drained and developed by one well.

In this pool, by Order 586 and 586-A, the Commission has established 160 acres as the proration unit for the Justis Pool. The provision under which we assume that Amerada is proceeding is the Rule 5-C which provides that a non standard gas proration unit of less than 160 acres may be formed after notice and hearing by the Commission or by administrative approval under the provision of Paragraph D of this rule. Non standard gas proration units of more than 160 acres may be formed after notice and hearing by the Commission.

Now, the finding of fact which proceeded the Pool Order for the Byers-Queen and the Tubbs is finding of fact No. 9, that no evidence was presented at the hearing at which this order was adopted that no evidence was presented to justify a change in the size of standard gas units in the Tubb, Eyers-Queen or Justis Gas Pools from 160 acres. Our point is this, that if this Eule 5-0 is construed to mean that the Commission can establish as an exception a gas promation unit nearly three times the size of a standard unit,

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such a result is not supported by any finding of fact in the order and it permits a situation where neither the Commission nor the operators can know in advance the area which will be established as a proration unit.

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The statute provides that they shall set up a standard proration unit which is a standard. Deviations have been permitted, but an allocation of this much acreage in that area that they have found can be efficiently and economically drained by one well is not only contrary to the language of the statute, but we feel would create an impossible administrative situation in which the drainage area of individual tracts or wells would have to be determined in each field during the course of development.

We have no objection after a sufficient number of wells have been drilled to take interference tests of changing the standard unit for the entire field, but to attempt to make this calculation for individual tracts, particularly undrilled tracts, places an impossible administrative load on the Commission with respect to every gas field under it's jurisdiction. It is my opinion in the construction of the rule under which Amerada appears to be proceeding, that it was intended solely to take care of small tracts, much less than the proration unit that could conceivably be developed by a well on a standard unit or part thereof by an addition, inasmuch as the smaller or fractional tracts could not themselves cupport

a well.

That, we believe, was the original intent of the rule. It was not to permit a proration unit some three times the size of the standard to be created without a change in the field rules to make such larger areas standard, with exceptions or deviations from it only as to non standard fractional units. Now, as a matter of fact, we are not only in sympathy with eliminating the necessity of drilling unnecessary wells on this particular section, we now have two wells on the section. That is between El Paso and Westates and stand ready to communitize these drilled tracts with the acreage in the north half of the section, which would eliminate the necessity of drilling any further wells in that section, if this Commission issues an order finding that the proration unit should be say 320 acres or 640 acres upon an appropriate finding of fact that one well will efficiently and economically drain that area.

We urge the Commission in this case to dismiss the application, leaving the door open to Amerada if they choose to seek an amendment of the existing field rules on such an appropriate finding of fact, to do so. We would point out that in our opinion the evidence introduced to date rests upon assumptions drawn from conditions existing in other fields several miles distance, but even granting those assumptions, the most that can be said is that sufficient gas has been produced from one of these wells in excess of the estimated quantity in place under the 160 point erect. There is no definity

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29 showing in our opinion as to how far the drainage extends. For that purpose we think that an interference test is the most reliable measure of that condition, which also should be coupled with factual data drawn from the field in question and not some other area.

Granting that those things can be rectified by a subsequent hearing in which the efficient drainage area can be more clearly shown in this particular pool, we would have no objection to the establishment of a larger area or to communitizing the acreage we now have to avoid any further drilling in this section.

MR. PORTER: Anyone else have a statement? Mr. Tomlinson.

MR. TOMLINSON: W. P. Tomlinson with Atlantic Refining Company. As Mr. Christie has noted, we do have an interest in this case and we wish to endorse Amerada's application and urge that the Commission adopt or grant a 440 unit.

MR. PORTER: Anyone else? Mr. Cooley.

MR. COOLEY: I have a letter from Westates Petroleum Corporation. "The Westates Petroleum Corporation is desirous of being represented in Case 1219 to be heard March 14, 1957 at Mabry Hall, State Capitol, Santa Fe. Due to unavoidable circumstances preventing appearance of a representative, we wish to be represented through the attorney for El Paso Natural Gas Company, inasmuch as we are equally interested and in agreement as to this Cuse at this time."

MR. PORTER: Mr. Bushnell.

MR. BUSHNELL: 1, at first, would like to say, and I think Mr. Woodward will agree, that any statements he has made concerning an offer for unitizing are so-called free statements for which I don't have knowledge of, and since he makes them in lieu of putting them in the testimony, I just remind the Commission that I don't wish for it to be treated as testimony. Mr. Woodward has recognized the provision in Order No. R-586 out of Case No. 728, and particularly Rule 5-C which provides, "non standard gas proration units of more than 160 acres may be formed after notice and hearing by the Commission".

He has also recognized that in his opinion the purpose for this express provision is to recognize it will take care of tracts in order to protect the correlative rights. That's a paraphrase of Mr. Woodward's statement, but I think he will agree with the meaning or intention of my meaning.

I am inclined to agree with him. As a matter of fact, I will even say that this is not a common provision in spacing orders which provide for standard units of 160 acres. However, it is my opinion that this provision although it may not be so expressed, is necessarily implied in every order issued by the Commission, because under the statutes which you give the Commission the authority to set up units, in particular the authority to set up a unit of 160 acres, the Commission has the duty of nevertheless protecting the rights of correlative owners.

The evidence in this case, and it is uncontraverted, is first that a single well will drain 440 acres. Mr. Woodward has recognized the desireability of not requiring the operator to drill an excess number of wells. The evidence also shows that there are certain tracts, lease tracts within this 440 acre proposed unit on which it would not be economical for the operator to drill separately.

In view of this evidence, and it is this evidence that we think justifies us to make application in the manner in which we do, that is as an exception to the Order No. R-586, as the Commission expressly provides in Rule 5-C, that promted us to make application in the manner in which we have.

We believe that the Commission does have the authority to grant such an exception, and although we are cognizant of the desircability of removing unnecessary administrative paper work from the Commission's now heavy ochedule, is, and I think Mr. Woodward would agree, that notwithstanding that fact, you can't use that as a basis for prohibiting operators whose rights are to be protected and whose duty it is to protect their royalty owners under their leases, to come in and ask for an exception on that basis.

My conclusion is that the Commission has the authority to grant an exception under Rule 5-C of Order No. R-586 and that it is proper to do sc in the manner in which the applicant has applied for in this instance.

R. PORTER: Anyone else have anything to say in this case?

If nothing further in the case, we'll take it under advisement.
II HOUMING IN ONEI IN ONE CADE, WE II DAKE ID UNGEL AUVISEMENT.
<u>C E R T I F I C A T E</u>
STATE OF NEW MEXICO )
) ss. County of Bernalillo )
I, ADA DEARNLEY, 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 day of March, 1957.
1. 1
Notary Public - Court Reporter
My commission expires:
My commission expires: June 19, 1959.

DIL CONSERVATION COMMISSION P. O. BOX 871 SANTA FE, NEW MEXICO ٠

<u>\_</u>

åpril 24, 1957

Mr. H. D. Bushnell Amerada Petroleum Corp. P.O. Box 2040 Tulsa, Oklahoma

Dear Sir:

We enclose a copy of Order R-978 issued April 23, 1957, by the Oil Conservation Commission in Case 1219, which was heard on March 14th.

Very truly yours,

A. L. Porter, Jr. Secretary - Director

bp Encl.

## DIL CONSERVATION COMMISSION P. D. BOX 871 SANTA FE, NEW MEXICO

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April 24, 1957

Mr. John G. Benton Westates Petroleum Corp. P.O. Box 1381 Jal, New Mexico

Dear Sir:

We enclose a copy of Order R-978 issued April 23, 1957, by the Oil Conservation Commission in Case 1219, which was heard on March 14th.

Very truly yours,

A. L. Porter, Jr. Secretary - Director

bp Encl.

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DIL CONSERVATION COMMISSION P. O. BOX 871 SANTA FE, NEW MEXICO -

April 24, 1957

Mr. John Woodward El Paso Natural Gas Co. P.O. Box 1492 El Paso, Texas

Dear Sir:

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We enclose a copy of Order R-978 issued April 23, 1957, by the Oil Conservation Commission in Case 1219, which was heard on March 14th.

Very truly yours,

A. L. Porter, Jr. Secretary - Director

bp Encl.
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 CONSIDERING:

**. .** .

CASE NO. 1219 Order No. R-978

IN THE MATTER OF THE APPLICATION OF AMERADA PETROLEUM CORPORATION FOR A 440-ACRE MON-STANDARD GAS PRORATION UNIT IN THE JUSTIS GAS POOL CONSISTING OF THE W/2 SW/4 OF SECTION 24, THE N/2 OF SECTION 25, AND THE NE/4 NE/4 OF SECTION 26, ALL IN TOWNSHIP 25 SOUTH, HANGE 37 EAST, NMPM, LEA COUNTY, NEW MEXICO.

## ORDER OF THE COMMISSION

## BY THE COMMISSION:

This cause came on for hearing at 9 o'clock a.m. on March 14, 1957, at Santa Fe, New Mexico, before the Gil Conservation Commission of New Mexico, hereinafter referred to as the "Commission."

NOV, on this  $23^{R^2}$  day of April, 1957, the Commission, a quorum being present, having considered the testimony presented and the exhibits received at said hearing and being fully advised in the premises,

### FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the Commission, by Order R-586 and R-586-A established a unit of 160 acres as the standard spacing and provation unit in the Justis Gas Pool.

(3) That the applicant proposes to establish a 440-acro non-standard gas promation whit in the Justice Cost Dool condicting of the W/2 SW/4 Section 14, the N/1 of Section 25, and the NE/4 NE/4 of Section 26, all in Township 20 South, Range 37 East, NMPH, Les County, New Mexico, said unit to be dedicated to a proposed well to be drilled at a point D99 Sect from the North line and 1650' from the West line of Said Section 26.

(4) That the applicant and called to prove that the afforementioned proposed walk would estimisatly and adequately drain the proposed 440 more unit, and that therefore, the application should be denied.

-2-Case No. 1219 Order No. R-978

## 11 IS THEREFORE ORDERED:

That the application of Amerada Petroleum Corporation for a 440-acre non-standard gas proration unit in the Justis Gas Pool consisting of the W/2 SW/4 of Section 24, the N/2 of Section 25, and the NE/4 NE/4 of Section 26, all in Township 25 South, Range 37 East, HMPN, Les County, New Mexico, to be dedicated to a well to be drilled at a point 990 feet from the North line and 1650 feet from the West line of said Section 25, be and the same is hereby denied.

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

> STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

EDWIN L. MECHEN, Chairman

Wellago MURRAY E. MORGAN, Member

A. L. PORTER, Jr., Member & Secretary



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## WESTATES PETROLEUM CORPORATION



EXECUTIVE OFFICES 391 BUTTER BTREET Ban Francisco, California .

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John & Benton

OIL CONSERVATION COMMISSION SANTA FE, NEW MEXICO

3/30/17 Date\_ 1219 am on 3/14/57 before acc 4 CASE Hearing Date\_

My recommendations for an order in the above numbered cases are as follows:

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	PRC	DUCTION	D	ATA	
OLSEN	OIL	COMPANY	-	WIMBERLY	#1
JUSTIS POOL					

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Date	Gas Production Mcf	Shut-In Tubing Pressure, Psi	Estimated BHP, Psi
<u>1947</u> January February March April	No Production Data	1820	202 <b>7</b>
May June July August September October November December	Available		
'Total Cumulative	80,466 80,466		
<u>1948</u> January February March April May June July August September October November December Total Cumulative	37,915 25,945 18,047 68,663 74,259 85,289 83,757 93,770 19,009 44,804 541,458 521,924	1794	1998
<u>1949</u> January February March April May June	39,915 59,189 28,320 23,286 1,141	1630	1815
July August September October November December	381 1,484 3,331 1,368 5,119 4,105	1715	1511
Total Cumulative	167 <b>,63</b> 9 789,563		

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Date	Gas Production Mcf	Shut-In Tubing Pressure, Psi	Estimated BHP, Psi
<u>1950</u> January February March April May June July	5,952 475 572 828 6,140 2,416 2,029	1738	1936
August September October November December	11,348 635 1,298 7,888 7,098	1748	1947
Total Cumulative	46,679 836,242		
<u>1951</u> January February March April May June July Angust September October November December	16,668 9,379 35,748 36,450 2,909 3,157 20,973 2,677 8,245 713 1,879 4,045	1658 1724	1847 1921
Total Cumulative	142,843 979,085		
1952 January February March April May June July August September October November December	17,730 $41,717$ $4,107$ $3,978$ $11,605$ $4,135$ $2,028$ $843$ $9,807$ $1,112$ $14,587$ $76,669$	1711 175.1	<b>19</b> 06 1929
Total Cumulative	142,817 1,121,972		

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Date	Gas Production Mcf	Shut-In Tubing Pressure, Psi	Estimated BHP, Psi
1953 January February March April May June July August September October November December	56,669 46,933 4,550 7,375 6,333 11,638 1,448 5,484 1,398 5,079 6,501 27,652	1706	1900
Total Cumulative	181,060 1,302,962		
1954 January February March April May June July August September October November December	27,652 18,495 10,255 14,377 267 6,375 6,585 747 1,820	1690	1883
Total Cumulative	88,277 1,391,239		
1955 January February March April May June July August September October November	6,850 19,199 3,725 21,193 50,536	1717	1913
December	36,067		
Total Cumulative	137,570 1,528,809		

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Same in the states

Date	Gas Production Mcf	Shut-In Tubing Pressure, Psi	Estimated BHP, Psi
<u>1956</u> January February March April May June July August September October November December	7,273 41,384 214 293 19,245 26,745 79,125 7,520 8,636 81,567 90,493 5,592		
Total Cumulative	368, <b>087</b> 1,89 <b>6,</b> 896		

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## RECOVERY CALCULATIONS JUSTIS GAS POOL

Average Pay Thickness: Per Cent Porosity: Per Cent Water Saturation: Average Reservoir Pressure, Undeveloped Acreage: Recoverable Gas to 200# BHP: 20' 8.5 (Based on Monument-Paddock Porosity) 20.0

2000# 7000 Mcf/Acre

Volumetric Calculations Olsen Oil Company - Wimberly #1

Original BHP: Present BHP: Cumulative Production:	2050# 1850# 1,896,896 Mcf Gas
Gas Originally in Place	= $43.558 \times .085 \times .80 \times \frac{2064}{14} \times \frac{520}{570}$
	= 403.3 Mcf/Acre-Foot
Gas Now in Place	$= 43.558 \times .085 \times .00 \times \frac{1864}{14} \times \frac{520}{570}$
	= 364.2 Mcf/Acre-Foot
Area Being Drained	= <u>1,896,896</u> = 403.3 - 364.2 = 48,514 Acre-Feet

Area for 20' Pay Thickness = 2,425 Acres

Volumetric calculations probably are meaningless in this case as the Paddock gas pay is underlain by a large water body which would result in some amount of water **d**rive. Possibly the best approach is to point out area being drained assuming different stages of depletion.

At the present time, Olsen's Wimberly #1 well has recovered 1,896,896 Mcf of gas which represents complete drainage of 271 acres. If the well is 25% depleted, it will ultimately recover 7,587,500 Mcf gas and will have drained over 1,080 acres. If the well is now 50%

depleted, ultimate recovery will total 3,793,792 Mcf of gas which gives a drainage area of over 540 acres. 75% depletion would yield an ultimate recovery of 2,529,190 Mcf of gas which represents a drainage area of 361 acres.

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The following is a tabulation of Justis pool gas wells showing cumulative production and area drained to date by each well.

Cities Service Continental El Paso Olsen Tidewater WeStates Western Natural	Hodges B-1 State A-2 #1 Justis #1 Wimberly #1 Coates C #1 Carlson A #1 Eaton B #1	Cumulative Gas <u>Production - Mef</u> 1,024,444 144,786 1,685,693 1,896,896 505,856 245,860 2,991,823	Acres Drained to <u>1-1-57</u> 146 21 241 271 72 35 427
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GENERAL OFFICES 120 BROADWAY NEW YORK

# AMERADA PETROLEUM CORPORATION

TELSA 2, OKLA.

ROBERT J. STANTON GENERAL COUNSEL JOHN S. MILLER ASSISTANT GENERAL COUNSEL

LEGAL DEPARTMENT

February 11, 1957

H. D. BUSHNELL HAROLD J. FISHER ROBERT T. JAMES ROBERT E. LEE JAMES C. MCWILLIAMS VIRGIL C. MORELLE ARDEN E. ROSS ATTORNEYS

Oil Conservation Commission State of New Mexico P.O.Box 871 Santa Fe, New Mexico Res

Re: (1) Application pertaining to the Justis Gas Pool;
(2) Application for promulgating rules relating to Gas Pool delineations underlying certain lands;

All in Lea County, New Mexico.

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the enclose the original and two copies of the Applications for the two captioned matters, and request a hearing date for March, 1987, there are the domination of the Exeminen, whichever is more conven-

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### BUPONE THE CHARACTERIA CONTRACTOR OF THE STATE OF THM ME ITTO

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CLOPELS NO. 12K1

#### APPLICATION

Comes now intervals Fetroleum Corporation and alleges and states the following:

1. That Applicant is even of the operating rights on the M/2 SW/4 of Section 24, the IM/4 and SW/4 NE/4 of Section 25, and NE/4 NE/4 of Section 26.

2. That Atlantic Refining Company is owner of the operating rights on the E/2 NE/4 and NM/4 NE/4 of Section 25.

3. That Applicant proposes to drill and complete in the Paddock Gas zone a well located 1650 feet from the West line and 990 feet from the North line of Section 25-259-375, Les County, New Mexico, to be known as Amerada-Mimberly 43 Mell.

4. That Applicant proposes to dedicate to said well the acreage under which it owns the operating rights as described in Paragraph 1 above, also, by agreement with Atlantic Refining Company to dedicate to said well the acreage described in faragraph 2 above, and to form a single non-standard gas proration unit comprising a total of 440 acres as an exception to Rule 5-B of Order No. R-586.

5. That the unit herein proposed is made in the interest of conservation and will protect the correlative rights of owners thereunder.

WHEREFORM, Applicant "copetibility requests that this matter he set for hearing and that upon due notice and evening the Amnission enter its order sutherizing the formation of the 440-spec non-standard has provablem unit in the manner mersin proposed.

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AMERADA-ATLANTIC WIMBERLY GAS UNIT JUSTIS GAS POOL LEA COUNTY, NEW MEXICO

a JUSTIS POOL GAS WELL

I INCH: 2000 FEET