PUBCO PETROLEUM CORPORATION

Post Office Box 1419

Albuquerque, New Mexico

13.3 JUN 13 PM 1 1 June 16, 1961

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Re: Application for Exception to Rule 5(a) of Order R-1670-C for a Non-Standard Gas Proration Unit, Basin Dakota Gas Pool, San Juan County, New Mexico

Oil Conservation Commission State of New Mexico Post Office Box 871 Santa Fe, New Mexico

Gentlemen:

Pubco Petroleum Corporation hereby submits its application for administrative approval of a non-standard proration unit comprising the East Half ($E^{\frac{1}{2}}$) (or Lots 1, 2, $S^{\frac{1}{2}}NE^{\frac{1}{4}}$, $SE^{\frac{1}{4}}$) of Section 1, Township 29 North, Range 11 West, N.M.P.M., San Juan County, New Mexico, and in support thereof states the following facts:

- 1. The Federal #29-11, 1-0 (KD), located 990 feet from the South line and 1600 feet from the East line of Section 1, Township 29 North, Range 11 West, is to be drilled and completed as a Dakota gas well.
- 2. That the proposed non-standard gas unit consists of 305.06 acres which are contiguous quarter-quarter sections and lots.
- 3. That the proposed non-standard gas unit lies wholly within a single government section.
- 4. That the proposed non-standard gas unit may reasonably be presumed to be productive of gas.
- 5 That the length and width of the proposed non-standard gas unit does not exceed 5280 feet.
- 6. That by copy of this letter of application all operators owning interests (a) in the section in which any part of the non-standard unit is situated and which acreage is not included in said non-standard gas unit, and (b) in acreage offsetting the non-standard gas unit, are notified by Certified Mail of this proposed non-standard gas unit.

Therefore, Pubco Petroleum Corporation requests that under the provisions of Rule 5(b) of Order R-1670-C, the Secretary of the Commission grant

exception to Rule 5(a) without Notice and Hearing, and approve the subject non-standard gas proration unit.

Respectfully submitted,

PUBCO PETROLEUM CORPORATION

Executive Vice-President

OCC/al

A copy of this application is being sent by Certified Mail, return receipt requested to the attached list of owners.

Copies of the foregoing Application for non-standard gas unit on the Federal #29-11, 1-0 (KD) Well were forwarded by Certified Mail, return receipt requested, to the following listed parties:

El Paso Natural Gas Company P. O. Box 1492 El Paso, Texas

Morris & Burk, Ltd. 1610 First National Bank Building Dallas 1, Texas

D. R. Zachry 2519 Cambria Dallas, Texas

Tidewater Oil Company 1478 Main Avenue Durango, Colorado

State of New Mexico

County of Bernalillo

Delhi-Taylor Oil Corporation Fidelity Union Tower 1507 Pacific Avenue Dallas 1, Texas

A. M. Lloyd M & W Tower Dallas 1, Texas

Russell W. Jay & Irving W. Weiss, D.B.A. Abraham-Weiss, Counselors 50 Broad Street
New York 4, New York

Frank D. Gorham, Jr., being first duly sworn hereby states that he is Executive Vice President of Pubco Petroleum Corporation, the Applicant in the foregoing application; that he has executed said application on behalf of Pubco Petroleum Corporation; that he has read said application and, to the best of his knowledge, information and belief, all statements of fact therein contained are true and correct; that a copy of this application was duly deposited on June 16, 1961, in the United States Post Office as Certified Mail, with all charges prepaid, addressed to the parties shown above.

Frank D. Gorham, Jr.

Subscribed and Sworn to before me by the said Frank D. Gorham, Jr., this 16th day of June, 1961, to certify which witness my hand and seal of office.

My Commission Expires:

May 27, 1964

Notary Public in and for Bernalillo County, New Mexico