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Roy G. Barton Jr.

Oil and Gas Producer

1919 NORTH TURNER
HOBBS, NEW MEXICO 88240

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OCT 9 2003

October 6, 2003

Oil Conservation Division

New Mexico Oil Conservation Division
1220 So. St. Francis Dr.
Santa Fe NM 87505

RE: Hearing Case No. 13144 - 8:15AM October 9th, 2003
"Application of Permian Resources, Inc. to Amend the
Special Rules and Regulations for the North Shoe Bar-
Strawn Pool to Change the Acreage Dedication and Well
Location Requirements, or Alternatively, for an Un-
orthodox Well Location, Lea County, New Mexico

Dear Mr. Examiner:

I am a mineral/royalty owner under the S/2NW/4 of Section 13,
T-16-S, R-35-E, Lea Co. NM. My interest under this tract has
been dilluted/communitized with the entire NW/4 of said Section
13 by virtue of the Commission Rules regulating the spacing and
production from the Hilburn #1 Well in unit E of said section,
said well having been producing since 1973.

It would seem unfair at this point to change the spacing rules
to 80 acres giving the applicant "carte blanche" to decide which
way to run the 80 acre unit. This portion of the application to
which I protest is paragraph 4 page 2.

I do not have any problem with the applicant's alternative request
as outlined in paragraphs 8, 9, 10, & 11, page 3.

Respectfully submitted.


Roy G. Barton Jr.



E. L. LATHAM, JR.
OIL & GAS PROPERTIES
P. O. BOX 1392
HOBBS, NEW MEXICO 88240
505/393-8022 3574

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1220 South St. Francis Dr.
Santa Fe, NM 87505

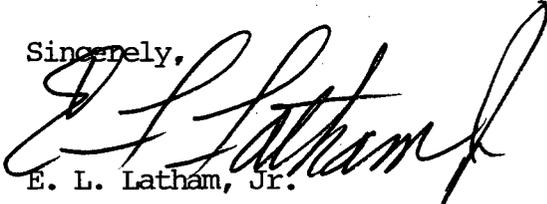
Re: NMOCD Case No. 13144; Application of Permian Resources, Inc.
to Amend the Special Rules and Regulations for the North
Shoe Bar-Strawn Pool to Change the Acreage Dedication and
Well Location Requirements, or Alternatively, for and
Unorthodox Well Location, Lea County, New Mexico.

Attention: Examiner:

I have had a royalty interest (minerals) under the Hilburn #1 Well that was communitized by virtue of the Commission Rules since 1973. (being all of the NW/4 of Section 13). My royalty interest was dilluted since my interest was under the S/2NW/4. Sec. 13, T16S. R35E, Lea County, NM. The Hilburn #1 Well is located in unit "E" of Sec. 13. This dilluted interest has been producing over the last 30 years. I feel it would be unfair for Permian Resources to change the spacing to where the Hilburn #3 Well be dedicated only to the N/2NW/4, Sec. 13, T16S, R35E, Lea County, New Mexico.

The portion of the Application to which I do protest is para-
graph 4, page 2. I do not find any other problem with the
remainder of Permian Resources Application.

Sincerely,


E. L. Latham, Jr.