



September 14, 2004

**HAND-DELIVERED**

Mark E. Fesmire, P. E.  
Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

*Case 13349*

2004 SEP 14 PM 4 13

Re: Application of Marbob Energy Corporation to authorize unorthodox well locations within the Dodd Federal Unit, Eddy County, New Mexico.

Dear Mr. Fesmire:

Enclosed in triplicate is the Application of Marbob Energy Corporation in the above-referenced case as well as a copy of the legal advertisement. Marbob Energy Corporation requests that this matter be placed on the docket for the October 7, 2004 Examiner hearings.

Very truly yours,

William F. Carr

Enclosures

cc: Mr. Raye Miller  
Marbob Energy Corporation

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

**IN THE MATTER OF THE APPLICATION OF MARBOB ENERGY CORPORATION  
TO AUTHORIZE UNORTHODOX WELL LOCATIONS WITHIN THE DODD  
FEDERAL UNIT, EDDY COUNTY, NEW MEXICO.**

CASE NO. 13349

**APPLICATION**

MARBOB ENERGY CORPORATION ("Marbob"), through its undersigned attorneys, hereby makes application pursuant to the New Mexico Oil Conservation Division for an order authorizing unorthodox well locations within its Dodd Federal Unit and in support of its application states:

1. Marbob will be the operator of the proposed Dodd Federal Unit which is comprised of 2400 acres, more or less, of federal lands that are the subject of a companion case in which Marbob seeks an order statutorily unitizing the unit area which is more particularly described as follows:

**TOWNSHIP 17 SOUTH, RANGE 29 EAST, NMPM**

Section 10:	E/2, E/2 W/2
Section 11:	All
Section 14:	All
Section 15:	E/2
Section 22:	SE/4, SE/4 SW/4, E/2 NE/4, SW/4 NE/4

Waterflood operations have been conducted in portions of the area covered by this proposed unit since 1985 pursuant to Division order No. R-7900, dated April 25, 1985.

2. Marbob intends to seek authority to extend the existing waterflood project into additional portions of the proposed Unit and is currently engaged in work in the unit area to determine the exact needs for such request.

3. To complete this evaluation and to implement an efficient injection pattern within the unit area, Marbob will drill new wells in the unit area. Many of these wells will be at unorthodox locations.

4. To avoid unnecessary applications for approval of unorthodox well locations within the unit area, Marbob seeks authorization to drill producing wells at unorthodox locations within the unit area provided that such locations are at least 330 feet from the outer boundary of the Dodd Federal Unit and are at least twenty-five (25) feet from any quarter section line or quarter-quarter section line.

5. Approval of this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Marbob Energy Corporation requests that this application be set for hearing before an examiner of the Oil Conservation Division on October 7, 2004, and, that after notice and hearing as required by law, the Division enter its order granting this application and authorizing Marbob Energy Corporation to drill unorthodox well locations within its Dodd Federal Unit under the conditions and limitations set forth herein.

Respectfully submitted,

HOLLAND & HART LLP

By: 

William F. Carr

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR MARBOB ENERGY  
CORPORATION

CASE 13349

**Application of Marbob Energy Corporation for authorization of unorthodox well locations within its Dodd Federal Unit, Eddy County, New Mexico.** Applicant seeks authority to drill producing wells at unorthodox locations within its Dodd Federal Unit located in portions of Township 17 South, Range 29 East, NMPM, provided said locations shall be no closer than 330 feet to the outer boundary of the Unit Area nor closer than 25 feet to any quarter section line or quarter-quarter section line. Said unit is located approximately 3.3 miles west of Loco Hills, New Mexico.

**Application of Marbob Energy Corporation  
for Statutory Unitization and to Authorize  
Unorthodox Well Locations Within the  
Dodd Federal Unit Area  
Eddy County, New Mexico**

**Exhibit A**

Minerals Management Service  
P. O. Box 5810 T A  
Denver, CO 80217-5810

Stanley William Rosenfield Trust  
Stanley W. Rosenfield Trustee  
2029 Century Park East  
Los Angeles, CA 90667

Pitch Energy Corporation  
Post Office Box 304  
Artesia, NM 88211-0304

Minerals Management of Interior – MMS  
Royalty Management Program  
Post Office Box 5750  
Denver, CO 80217-5760

Elks National Foundation  
James W. O. Kelley Director  
2750 N. Lakeview Avenue  
Chicago, IL 60614-1089

Timothy T. Leonard  
1913 Grimes, Suite B261  
Hobbs, NM 88240

Shattuck-St. Mary's School  
Post Office Box 218  
Faribault, MN 55021-02185

Roger Penske  
Penske Corporation  
187 Highway 36  
West Long Branch, NJ 07764-1304

George S. McCall  
400 Spillar Lane  
Austin, TX 78746-4437

Dana Lyn Bukowski Trust #175  
Northern Trust Bank of Texas  
P. O. Box 226270  
Dallas, TX 75222-6270

Charles and Jan Mee Rev. Trust  
1208 Larchmont Lane  
Oklahoma City, OK 73116-6104

Donald & Marilyn Harris Trust  
Donald A. Harris  
2249 Elsinore Road  
Riverside, CA 92506

Marbob Energy Corporation  
Post Office Box 227  
Artesia, NM 88211-0227

Boys & Girls Clubs of America  
National Headquarters  
1230 W. Peachtree Street, NW  
Atlanta, GA 30309-3447

Leonard Trust  
Robert J. and Marion Leonard Trustees  
Post Office Box 400  
Roswell, NM 88202-0400

New Mexico Boys and Girls Ranches, Inc.  
formerly New Mexico Boys Ranch Inc.  
Business Office  
6209 Hendrix Rd NE  
Albuquerque, NM 87110-1334

Gary B. Laughlin  
3831 Turtle Creek Blvd #18-D  
Dallas, TX 75219-4414

Nancy Harrell  
James E. Harrell  
4928 Post Oak Timber Drive  
Houston, TX 77056-2212

James E. Lyon Estate  
c/o John D. Hughes Independent Ex.  
1415 Louisiana Suite 3700  
Houston, Texas 77002

David Frame, Jr.  
PMB 919  
1302 Waugh Drive  
Houston, TX 77019

Edward J. Hudson, Jr.  
c/o Blaffer Interests  
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Houston, TX 77056

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Midland, TX 79702-0318

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Littleton, CO 80122-2541

Regents, University of New Mexico  
Leonard Trust  
UNM Pre-Audit Dept.  
Scholes Hall Room #260  
Albuquerque, NM 87131-3111

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211 W. Tilden  
Roswell, NM 88201-5746

Grethe Hostmalingen  
Gamle Roisliveien 17  
N 2613 Lillehammer  
Norway

Allan C. George  
280 Beacon Street  
Boston, MA 02116-1241

Petco Limited  
Post Office Box 911  
Breckenridge, TX 76424-0911

Jennifer Stewart Lyon Trust  
Compass Bank Co. TRE #0254  
P. O. Box 4886  
Houston, TX 77210-4886

MEXCO Energy Corporation  
P. O. Box 10502  
Midland, TX 79702

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721 Robins Road  
Lansing, MI 48917-2022

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Lansing, MI 48917-2022

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New Haven, CT 06512-3626

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1111 North Pennsylvania Avenue  
Roswell, NM 88201-5046

Hans Teisner  
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618 Oakwood Place NE  
Albuquerque, NM 87123

Melissa Lyon Fuller Simon Tr  
Compass Bank Co. TRE #0213  
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Houston, TX 77210-4886

Gregg E. Goodall, et us, Jean  
P. O. Box 1152  
Breckenridge, TX 76424

John F. Haire  
3502 W Avenue K-4  
Lancaster, CA 93536

Comptroller of Public Accts F/A/O  
Betty J. Haire  
Unclaimed Property Division  
P. O. Box 12019  
Austin, TX 78711-2019

S. E. Murphree Jr.  
Apt. 103  
9333 Memorial Drive  
Houston, TX 77024-5735

Central Texas Operating Inc.  
Attn: Gregg Goodall  
P. O. Box 1152  
Breckenridge, TX 76424-1152

OOPS Inc.  
Attn: Anne D. Owen  
5120 Woodway Drive, Suite 9001  
Houston, TX 77056-1724

Loneta S. Curtis Trustee  
Loneta S. Curtis Lvg Trust  
P. O. Box 261427  
Plano, TX 75026-1427

Jane Blaffer Owen  
Blaffer Agency Min Sec Acct No 1013067  
JP Morgan Chase Bank Agent & AIF  
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Houston, TX 77216-0336

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c/o Lawson & Holland & Hart LLP One Linden  
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Veslemoy Andresen Roer  
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0377 Oslo  
Norway

Nuevo Seis Ltd Partnership  
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Roswell, NM 88202-2588

H. L. Brown Operating LLC  
Attn: Accounting Department  
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Midland, TX 79702-2237

Molly M. Azopardi  
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Wimberley, TX 78676

R. H. Fulton Estate  
Joe K. Fulton Foreign Ind. Ex.  
P. O. Box 16860  
Lubbock, TX 79490-6860

Chase Oil Corporation  
P. O. Box 1767  
Artesia, NM 88211-1767

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P. O. Box 671096  
Dallas, TX 75367-1096

Jack Fulton Jr.  
P. O. Box 16860  
Lubbock, TX 79490-6860

Carolyn B. Wood Trustee  
Wood Heritage Trust  
P. O. Drawer 1011  
Refugio, TX 78377-1011

Bean Family Limited Company  
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Roswell, NM 88202-1738

Nancy K. McClymond S/F  
P. O. Box 513  
Ranchos de Taos, NM 87557

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108 Vista Del Sol  
Belen, NM 87002

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Robert Blaffer Hudson  
Chase Bank  
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James E. Lyon Estate  
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Tex Zia Properties  
Loneta S. Curtis Trustee  
Loneta S. Curtis Lvg Trust  
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Plano, TX 75026-1427

The Bishop Whipple Schools  
Shattuck-St. Mary's School  
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David M. Munson, Jr.  
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Tex Zia Properties  
Loneta S. Curtis Trustee  
Loneta S. Curtis Lvg Trust  
605 S. 15th  
Artesia, NM 88210





September 14, 2004

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

**TO AFFECTED INTEREST OWNERS:**

Re: Application of Marbob Energy Corporation to authorize unorthodox well locations within the Dodd Federal Unit, Eddy County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Marbob Energy Corporation has filed the enclosed application with the New Mexico Oil Conservation Division seeking the authorization to drill wells at unorthodox well locations under conditions set out in the application within its Dodd Federal Unit located in Sections 10, 11, 14, 15 and 22 of Township 17 South, Range 29 East, NMPM, Eddy County, New Mexico.

This application has been set for hearing before a Division Examiner on October 7, 2004. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Pre-Hearing Statement with the Oil Conservation Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, three days in advance of a scheduled hearing. This statement must include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Very truly yours,

William F. Carr

cc: Raye Miller  
Marbob Energy Corporation