

Ocean Munds-Dry Associate omundsdry@hollandhart.com

	April 10, 2007			~
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HAND-DELIVERED				APR
Mark E. Fesmire, P.E.				တ
Director			C 1/	PM
Oil Conservation Division			13916	
New Mexico Energy, Minerals and	P	2 pl	•	ယ
Natural Resources Department		α		
1220 South Saint Francis Drive				, .,
Santa Fe, New Mexico 87505				

Re: Application of Parallel Petroleum Corporation for compulsory pooling, Chaves County, New Mexico.

Dear Mr. Fesmire:

Enclosed is the application of Parallel Petroleum Corporation in the above-referenced case as well as a copy of a legal advertisement. Parallel requests that this matter be placed on the docket for the May 10, 2007 Examiner hearings.

Sincerely,

Ocean Munds-Dry

Enclosures

cc: Mr. Aaron Myers

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

IN THE MATTER OF THE APPLICATION OF PARALLEL PETROLEUM CORPORATION FOR COMPULSORY POOLING, CHAVES COUNTY, NEW MEXICO.

APPLICATION

PARALLEL PETROLEUM CORPORATION, ("Parallel") through its undersigned attorneys, hereby makes application to the Oil Conservation Division pursuant to the provisions of N.M.Stat.Ann. § 70-2-17 (2006), for an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in the following described spacing and proration units located in the S/2 of Section 28, Township 15 South, Range 25 East, N.M.P.M., Chaves County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing and in support of its application states:

- 1. Parallel Petroleum Corporation is a working interest owner in said Section 28 and has the right to drill thereon.
- 2. Parallel proposes to dedicate the above-referenced spacing or proration unit to its Unbridled 1525-28 Well No. 1 to be drilled as a horizontal well from a surface location 1880 feet from the South line and 237 feet from the East line and a bottomhole location 1880 feet from the South line and 660 feet from the East line of Section 28, Township 15 South, Range 25 East, NMPM, Chaves County, New Mexico to an approximate depth of 4750 feet to test any and all formations from the surface to the base of the Wolfcamp formation.
- 3. Parallel has sought and been unable to gain the voluntary participation of certain interest owners in the subject spacing unit who is identified on Exhibit A to this application.
- 4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.
- 5. In order to permit the Parallel to obtain its just and fair share of the oil and gas underlying the subject lands, all mineral interests should be pooled, and Parallel Petroleum Corporation should be designated the operator of the well to be drilled.

WHEREFORE, Parallel Petroleum Corporation requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 10, 2007 and, after notice and hearing as required by law, the Division enter its order:

- A. pooling all mineral interests in the subject spacing and proration units,
- B. designating Parallel Petroleum Corporation operator of these units and the well to be drilled thereon,
- C. authorizing Parallel Petroleum Corporation to recover its costs of drilling, equipping and completing the well,
- D. approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures, and
- E. imposing a penalty for the risk assumed by Parallel Petroleum Corporation in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted, HOLLAND & HART LLP

WILLIAM F. CARR OCEAN MUNDS-DRY

Post Office Box 2208

Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR PARALLEL PETROLEUM CORPORATION

EXHIBIT A

APPLICATION OF PARALLEL PETROLEUM CORPORATION. FOR COMPULSORY POOLING S/2 OF SECTION 28, TOWNSHIP 15 SOUTH, RANGE 25 EAST, N.M.P.M. CHAVES COUNTY, NEW MEXICO.

Chapman Webb

Edna Earl Chapman

J.C. Chapman

Frieda Chapman

Sexton Family Trust

New Mexico Department of Transportation Attn: Rhonda Faught, Secretary 1120 Cerrillos Road Santa Fe, New Mexico 87504

L.E. Gross 1207 28th Street Hondo, Texas 78861

Carolyn G. Ray 5572 Leigh San Jose, CA 95124

Myrtis Sexton Ashy 3018 Colonial Ridge Drive Brandon, Florida 33511

Sallie Jean Skaggs Simpson 2302 Ripley Ave. Redondo Beach, CA 90278

CASE 13916: Application of Parallel Petroleum Corporation compulsory pooling, Chaves County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in the following described spacing and proration units located in the S/2 of Section 28, Township 15 South, Range 25 East, N.M.P.M., Chaves County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing. Said unit is to be dedicated to its Unbridled 1525-28 Well No. 1 to be drilled at a surface location 1880 feet from the South line and 237 feet from the East line and a bottomhole location 1880 feet from the East line and 660 feet from the East line of Section 28, Township 15 South, Range 25 East, NMPM, Chaves County, New Mexico to an approximate depth of 4750 feet to test any and all formations from the surface to the base of the Wolfcamp formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Parallel Petroleum Corporation as operator of the well and a charge for risk involved in drilling said well. Said area is located 5 miles southwest of Lake Arthur, New Mexico.



Ocean Munds-Dry Associate omundsdry@hollandhart.com

April 10, 2007

U.S. MAIL

Re:

Application of Parallel Petroleum Corporation for compulsory

pooling, Chaves County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Parallel Petroleum Corporation has filed the enclosed application with the New Mexico Oil Conservation Division seeking an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in certain spacing and proration units in the S/2 of Section 28, Township 15 South, Range 25 East, N.M.P.M., Chaves County, New Mexico. Said pooled units are to be dedicated to Parallel's Unbridled 1525-28 Well No. 1 to be drilled at a surface location 1880 feet from the South line and 237 feet from the East line and a bottomhole location 1880 feet from the South line and 660 feet from the East line of Section 28, Township 15 South, Range 25 East, NMPM, Chaves County, New Mexico to an approximate depth of 4750 feet to test any and all formations from the surface to the base of the Wolfcamp formation.

This application has been set for hearing before a Division Examiner at 8:15 a.m. on May 10, 2007. The hearing will be held in Porter Hall in the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 four days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should 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.

Ocean Munds-Dry

ATTORNEY FOR PARALLEL PETROLEUM

CORP.