

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

RECEIVED OCD

2009 OCT -2 P 3: 18

October 2, 2009

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Case No. 14326/Order No. R-13166

Dear Florene:

Enclosed for filing, on behalf of Nacogdoches Oil and Gas Inc., are an original and five copies of an application for hearing *de novo*, together with a proposed advertisement. The advertisement was previously e-mailed to the Division.

Very truly yours,



James Bruce

Attorney for Nacogdoches Oil and Gas, Inc.

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

RECEIVED OGD

2009 OCT -2 P 3: 18

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF THE NEW MEXICO OIL  
CONSERVATION DIVISION FOR A COMPLIANCE  
ORDER AGAINST NACOGDOCHES OIL AND  
GAS, INC.

Case No. 14,326 (*de novo*)  
Order No. R-13,166

APPLICATION FOR HEARING *DE NOVO*

Nacogdoches Oil and Gas, Inc., a party of record adversely affected by the above Order, requests that this matter be heard *de novo* before the Oil Conservation Commission.

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Nacogdoches Oil and Gas, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy poof the foregoing pleading was served upon the following counsel of record by hand delivery this 2nd day of October, 2009:

Mikal Altomare  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505



James Bruce

PROPOSED ADVERTISEMENT

RECEIVED OCD

Case No. 14326 (De Novo):

2009 OCT -2 P 3: 19

*Application of the New Mexico Oil Conservation Division for a compliance order against Nacogdoches Oil and Gas, Inc., McKinley County, New Mexico.* Applicant seeks an order finding that Nacogdoches Oil and Gas, Inc. is in violation of NMAC 19.15.5.9 and 19.15.25.8 as to the 48 wells listed below, and to bring all 48 wells into compliance with Division rules by a date certain. The Division further seeks the authority to forfeit any associated financial assurance, and to plug and abandon the wells if the operator fails to meet the deadline established in the order. The Hospah Sand Unit is centered approximately 20 miles northeast of Crownpoint, New Mexico; the Lone Pine Dakota D Unit is centered approximately 24 miles east of Crownpoint, New Mexico; the Santa Fe Pacific Railroad well is located approximately 21 miles east of Crownpoint, New Mexico; the Santa Fe Railroad wells are located approximately 23 miles east of Crownpoint, New Mexico; the Santa Fe Railroad A wells are located approximately 24 miles east of Crownpoint, New Mexico; the Santa Fe Railroad B wells are located approximately 26 miles east of Crownpoint, New Mexico; and the South Hospah Unit is centered approximately 21 miles east of Crownpoint, New Mexico. Upon the application of Nacogdoches Oil and Gas, Inc., this case will be heard *De Novo* pursuant to the provisions of Division Rule NMAC 19.15.4.23

1. HOSPAH SAND UNIT #038	1. 30-031-05179
2. HOSPAH SAND UNIT #039	2. 30-031-05171
3. HOSPAH SAND UNIT #051	3. 30-031-05194
4. HOSPAH SAND UNIT #058	4. 30-031-20115
5. HOSPAH SAND UNIT #066	5. 30-031-05577
6. HOSPAH SAND UNIT #084	6. 30-031-20248
7. HOSPAH SAND UNIT #092	7. 30-031-20613
8. HOSPAH SAND UNIT #093	8. 30-031-20611
9. HOSPAH SAND UNIT #100	9. 30-031-20831
10. LONE PINE DAKOTA D UNIT #012	10. 30-031-20183
11. LONE PINE DAKOTA D UNIT #014	11. 30-031-20174
12. LONE PINE DAKOTA D UNIT #023	12. 30-031-20201
13. SANTA FE PACIFIC RAILROAD #009	13. 30-031-20182
14. SANTA FE RAILROAD #023	14. 30-031-20150
15. SANTA FE RAILROAD #044	15. 30-031-20713
16. SANTA FE RAILROAD #051	16. 30-031-20853
17. SANTA FE RAILROAD A #074	17. 30-031-20021
18. SANTA FE RAILROAD A #083	18. 30-031-20147
19. SANTA FE RAILROAD A #084	19. 30-031-20372
20. SANTA FE RAILROAD A #087	20. 30-031-20413
21. SANTA FE RAILROAD A #097	21. 30-031-20855
22. SANTA FE RR B #032	22. 30-031-20303
23. SANTA FE RR B #035	23. 30-031-20391
24. SOUTH HOSPAH UNIT #002	24. 30-031-05139
25. SOUTH HOSPAH UNIT #004	25. 30-031-05145

26. SOUTH HOSPAH UNIT #005  
27. SOUTH HOSPAH UNIT #006  
28. SOUTH HOSPAH UNIT #008  
29. SOUTH HOSPAH UNIT #009  
30. SOUTH HOSPAH UNIT #012  
31. SOUTH HOSPAH UNIT #013  
32. SOUTH HOSPAH UNIT #017  
33. SOUTH HOSPAH UNIT #021  
34. SOUTH HOSPAH UNIT #022  
35. SOUTH HOSPAH UNIT #027  
36. SOUTH HOSPAH UNIT #029  
37. SOUTH HOSPAH UNIT #033  
38. SOUTH HOSPAH UNIT #036  
39. SOUTH HOSPAH UNIT #037X  
40. SOUTH HOSPAH UNIT #047  
41. SOUTH HOSPAH UNIT #051  
42. SOUTH HOSPAH UNIT #052  
43. SOUTH HOSPAH UNIT #054  
44. SOUTH HOSPAH UNIT #057  
45. SOUTH HOSPAH UNIT #058  
46. SOUTH HOSPAH UNIT #059  
47. SOUTH HOSPAH UNIT #060  
48. SOUTH HOSPAH UNIT #063

26. 30-031-05146  
27. 30-031-20009  
28. 30-031-20015  
29. 30-031-20013  
30. 30-031-20020  
31. 30-031-20054  
32. 30-031-20057  
33. 30-031-05134  
34. 30-031-05498  
35. 30-031-20094  
36. 30-031-20120  
37. 30-031-20124  
38. 30-031-20118  
39. 30-031-20135  
40. 30-031-20361  
41. 30-031-20242  
42. 30-031-20243  
43. 30-031-20407  
44. 30-031-20408  
45. 30-031-20409  
46. 30-031-20410  
47. 30-031-20411  
48. 30-031-20544