

F. ANDREW GROOMS, LANDMAN IN DIVISION

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INDEPENDENT OIL AND GAS PRODUCER  
PETROLEUM LANDMAN

35 FEB 1 1995

TELEPHONE  
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January 30, 1995

New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87501

Attn: William J. LeMay

Re: Written objection to cases # 11194 and # 11195,  
Application of Charles B. Gillespie to statutorily  
unitize certain lands in T15 and 16S-R35E, NMPM  
Lea County, New Mexico.

Gentlemen:

I represent the Grooms Trust who is a mineral owner under the NW/4NE/4, Section 33, T15S-R35E, NMPM and as such am an affected mineral owner. I am in receipt of the captioned application and am very objectionable to it. The Operator (Charles B. Gillespie) proposes to unitize lands utilizing among other things, porosity and "pay" thicknesses which are based on seismic interpretations. The operator has not submitted to us any of the data in which he propose to base his request for statutory unitization. I am not personally able to attend the February 2, 1995 continued hearing.

I am in receipt of advice from David Petroleum Corporation who advances a totally different idea about the prospectiveness of the Strawn formation under the tract of land in which we own interest. I would not object to the unit if it was done on a totally undivided basis however this is not the case according to information received by my office. The Grooms Trust will be unjustly damaged and our correlative rights will be violated if this application is approved without further study and debate etc. We therefore request the commission's denial of Mr. Gillespie's request at this time. The Grooms Trust does however support the application of David Petroleum Corporation (Case # 11183) for compulsory pooling to cause a Strawn formation well to be drilled in the NW/4NE/4, Section 33, T15S-R35E, NMPM. Thank you for your consideration in this regard.

Yours Truly



F. Andrew Grooms  
Landman for the Grooms Trust