## STATE OF NEW MEXICO



## ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

## OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

April 4, 1995

Maralo, Inc. P. O. Box 832 Midland, Texas 79702

Attention: Dorothea Logan

Case 11277

Re:

Administrative Application of an Unorthodox Gas Well Location for the proposed Johnson "19" Well No. 1 (API No. 30-025-32906), to be drilled 2310'FSL - 990'FEL (Unit I) of Section 19, Township 9 South, Range 35 East, NMPM, Lea County, New Mexico.

Dear Ms. Logan:

The subject application dated March 31, 1995 was received by the New Mexico Oil Conservation Division in Santa Fe on April 4, 1995, I found, subsequent to my review, that this application can not be processed administratively. The "Special Rules and Regulations for the Northeast Jenkins-Devonian Pool", as promulgated by Division Order No. R-9912, as amended, provides for administrative exceptions to the well location requirements only when necessitated by topographic conditions or for the recompletion of an existing well previously drilled to a deeper horizon. Your unorthodox location is based on geologic conditions. Further, the 80 acres to be dedicated to this well, as shown on the OCD Form C-102 attached to the application, comprising the SE/4 NE/4 and NE/4 SE/4 of said Section 19, is inconsistent with Rule 2 of said special pool rules which provides for 80-acre units to comprise the N/2, S/2, E/2 or W/2 of a single governmental quarter section.

Since no further administrative action can be taken on this application, I have caused this matter to be placed on the next available docket for hearing before a Division Examiner scheduled for May 4, 1995.

Please provide proper notice of this case to all parties pursuant to the applicable provision in Rule 1207 of said Division's General Rules.

Should you have any questions concerning this matter, please contact me in Santa Fe at (505) 827-8185.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc:

Oil Conservation Division - Hobbs

William J. LeMay, Director - OCD, Santa Fe

William F. Carr - Santa Fe