



September 11, 1995

Mr. William J. LeMay, Director  
New Mexico Oil Conservation Division  
2040 S. Pacheco Street  
P.O. Box 6429  
Santa Fe, NM 87505

Southern

Rockies

Business

Unit

Case 11419

**Application For Compulsory Pooling**  
**Fruitland Sand and Pictured Cliffs Formations**  
**SW/4 Section 13-T27N-R13W**  
**2310' FSL & 1850' FWL**  
**Wildcat; 27N13W13K-Fruitland Sand Pictured Cliffs Pool**  
**San Juan County, New Mexico**

Amoco Production Company hereby makes application for compulsory pooling all mineral interests in the Fruitland Sand and the Pictured Cliffs Formations underlying the SW/4 of Section 13, T27N-R13W thereby forming a standard 160 acre gas spacing and proration unit for the Wildcat; 27N13W13K-Fruitland Sand Pictured Cliffs Pool to be dedicated to the Ginther Gas Com #2 Well. Amoco is the operator of this well and plans to recomplete the well from the Dakota formation to the Fruitland Sand and Pictured Cliffs formations.

In support of this application, Amoco states that it is the majority owner of working interest (52%) in both the Fruitland Sand and the Pictured Cliffs formations in the SW/4 of Section 13 T27N-R13W. Amoco has been unsuccessful in several attempts to get a written response from two of the working interest parties and we feel it is necessary to go forward with an action to force pool these parties. The hearing should consider the cost of recompleting said well and the allocation of such costs, the actual operating costs and charges for supervision, and a charge for risk involved in the recompletion of the well.

A copy of this application will be submitted to the owners of uncommitted leasehold interests by certified mail. Amoco respectfully requests that this application be set for hearing on the next available examiner hearing docket.

  
P.W. Staley

Attachment

cc: Julie Jenkins  
Mark Yamasaki

**UNCOMMITTED WORKING INTEREST OWNERS**

John R. Royall  
2600 Republic Bank Tower  
Dallas, Texas 75201-3803

H.S. Bennett  
P.O. Box 1401  
Dallas, Texas 75221-1401

Ginther Gas Com #2  
Forced Pooling Application

Location: 2310' FSL x 1850' FWL Section 13-T27N-R13W

BLM Lease Number SF-078099

Fruitland Sand  
Pictured Cliffs

Spacing: SW/4 of Section 13

**Working Interest Owners:**

Amoco Production Company	52.083335%
P. O. Box 800	
Denver, CO 80201	

Dugan Production Corp.	37.500000%
P. O. Box 420	
Farmington, NM 87499-0420	

John R. Royall	4.166665%
2600 Republic Bank Tower	
Dallas, TX 75201-3803	

H. S. Bennett	6.250000%
P. O. Box 1401	
Dallas, TX 75221-1401	

**Royalty Interest Owner:**

Minerals Management Service	12.500000%
Royalty Management Program	
P. O. Box 5810 TA	
Denver, CO 80217-5810	

**Overriding Royalty Interest Owners:**

Perry E. Pound	0.625000%
P. o. box 77156	
Steamboat Springs, CO 80477-1156	

Edmond Lee Ginther, Trustee	0.010000%
1517 San Jacinto	
Houston, TX 77002-7623	

Albert R. Greer	0.037500%
c/o Benson-Montin-Greer Drlg. Corp.	
501 Airport Drive, Suite 221	
Farmington, NM 87401	