

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

IN THE MATTER OF THE APPLICATION OF :  
BASS ENTERPRISES PRODUCTION CO. AND :  
SANTA FE ENERGY COMPANY FOR RESCISSION :  
OF ORDER NSL-3745, EDDY COUNTY, NEW MEXICO : CASE NO. 11713

MOTION TO CONSOLIDATE AND MOTION TO CONTINUE

COME NOW BASS ENTERPRISES PRODUCTION COMPANY and SANTA FE ENERGY COMPANY, by their attorneys, Losee, Carson, Haas & Carroll, P. A. (James E. Haas and Ernest L. Carroll), and in support hereof, respectfully state:

1. Bass and Santa Fe have made application in Case No. 11713 for the Division to rescind its Order NSL-3745 approving Mewbourne's Application for Unorthodox Well Location for its Scanlon Draw "35" State No. 1 Well at an unorthodox location 660 feet FSL and 1980 feet FWL of Section 35, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

2. Bass filed an Application to Drill and Simultaneous Dedication, or in the Alternative, Unorthodox Location and Simultaneous Dedication for its Turkey Track "2" State No. 2 Well for the E/2 of Section 2, Township 19 South, Range 28 East, N.M.P.M., Eddy County, New Mexico on Friday, February 28, 1997.

3. The evidence and issues in this Case 11713 and the case referred to in paragraph 2 herein are identical, and in the interest of time and economy, Bass seeks to consolidate these two cases.

4. Case 11713 is presently set for the March 20, 1997, docket, and in order to be heard with the more recent application, must be continued.

5. Opposing counsel have been provided with the subject motion and concurrence was requested, however, to date no response has been had.

WHEREFORE, Applicants pray as follows:

A. that the instant Case No. 11713 and the application referred to in paragraph 2 herein be consolidated and considered by the Division concurrently;

B. that this case be continued from the March 20, 1997, docket so that it may be heard concurrently with the more recent application referenced herein.

D. and for such other relief as may be just in the premises.

Respectfully submitted,

LOSEE, CARSON, HAAS & CARROLL, P.A.

By: James E. Haas  
James E. Haas  
Ernest L. Carroll  
P. O. Box 1720  
Artesia, New Mexico 88211-1720  
(505)746-3505

Attorneys for Applicants Bass Enterprises Production  
Company and Santa Fe Energy Company

LAW OFFICES

LOSEE, CARSON, HAAS & CARROLL, P. A.

311 WEST QUAY AVENUE

P. O. BOX 1720

ARTESIA, NEW MEXICO 88211-1720

TELEPHONE  
(505) 746-3505

FACSIMILE  
(505) 746-16316

MARY LYNN BOGLE  
ERNEST L. CARROLL  
JOEL M. CARSON  
DEAN B. CROSS  
JAMES E. HAAS  
DIANNA L. LUCE  
OF COUNSEL  
A. J. LOSEE

March 7, 1997

MAR 1997

CONCERN

**VIA FACSIMILE AND FIRST CLASS MAIL**

Mr. William J. LeMay  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87504

Re: Application of Bass Enterprises Production  
Company and Santa Fe Energy Company for Re-  
scission of Order NSL-3745/Case No. 11713

Dear Mr. LeMay:

Enclosed herewith please find Bass' Motion to Consolidate and  
Motion to Continue, in duplicate, for filing in the referenced  
cause of action.

Thank you for your consideration.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

James E. Haas

JEH:kth  
Encl.

xc w/encl: Mr. William F. Carr (by facsimile)  
Mr. J. Wayne Bailey, Bass Enterprises Production Co.