## CAMPBELL, CARR, BERGE

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### & SHERIDAN, P.A.

LAWYERS

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June 2, 1998

### HAND-DELIVERED

Lori Wrotenbery, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 2040 South Pacheco Santa Fe, New Mexico 87503

11993

# Re: Application of John H. Hendrix Corporation for compulsory pooling, Lea County, New Mexico

Dear Ms Wrotenbery:

Enclosed in triplicate is the Application of John H. Hendrix Corporation, in the abovereferenced case as well as a legal advertisement. John H. Hendrix Corporation, respectfully requests that this matter be placed on the docket for the June 25, 1998 Examiner hearings.

Very truly yours. ellan (

WILLIAM F. CARR

WFC:mlh Enclosures

cc: Damian Barrett (w/enclosures) John H. Hendrix Corporation Post Office Box 3040 Midland, TX 79702-3040

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

IN THE MATTER OF THE APPLICATION OF JOHN H. HENDRIX CORPORATION FOR COMPULSORY POOLING LEA COUNTY, NEW MEXICO.

CASENO. //993

#### **APPLICATION**

JOHN H. HENDRIX CORPORATION, through its undersigned attorneys, hereby makes application pursuant to the provisions of NMSA 1978, Section 70-2-17, for an order pooling all mineral interests from the top of the Abo formation (approximately 7,000 feet) to the base of the Strawn formation in all formations developed on 40-acre spacing underlying the NE/4 NW/4, including the Monument-Abo, Southeast Pool, and in all formations developed on 80-acre spacing underlying the E/2 NW/4, including the Cass Penn Pool, of Section 16, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico, and in support of this application states:

1. John H. Hendrix Corporation is a working interest owner in the E/2 NW/4 of Section 16, and has the right to drill thereon.

2. Applicant proposes to drill its proposed Wood State No. 4 in said Section 16 at a standard location 660 feet from the North line and 2310 feet from the West line (Unit C) of said Section 16 to test all formations from the top of the Abo formation to the base of the Strawn formation.

3. Applicant has sought and been unable to obtain either a voluntary agreement

for pooling or farmout from Dr. Henry Yeager, 5624 Knollwood Rd., Bethesda, Maryland 20816 and Mr. and Mrs. Roger Hansen, 4642 Lorraine Ave., Dallas, TX 75209.

4. Said pooling of interests and the drilling of the Wood State No. 4 will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

5. In order to permit John H. Hendrix Corporation to obtain its just and fair share of the oil and gas underlying the subject lands, all mineral interests should be pooled, and John H. Hendrix Corporation should be designated the operator of the well to be drilled.

WHEREFORE, John H. Hendrix Corporation requests that this application be set for hearing before an Examiner of the Oil Conservation Division on June 25, 1998, and, after notice and hearing as required by law, the Division enter its order pooling all mineral interests under the subject lands, designating John H. Hendrix Corporation operator of the proposed well and spacing unit, authorizing it to recover its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by John H. Hendrix Corporation in drilling, completing and equipping the well.

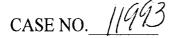
Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

By: 1

WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone:(505) 988-4421

ATTORNEYS FOR JOHN H. HENDRIX CORPORATION



Application of John H. Hendrix Corporation for compulsory pooling, Lea County, New Mexico. Applicant in the abovestyled cause seeks an order pooling all mineral interests in all formations from the top of the Abo formation (approximately 7,000 feet) to the base of the Strawn formation developed on 40acre spacing underlying the NE/4 NW/4, and in all formations developed on 80 acre spacing underlying the E/2 NW/4, including the Cass Penn Pool, of Section 16, Township 20 South, Range 37 East. Said unit is to be dedicated to its Wood State Well No. 4 which will be drilled at a standard location 660 feet from the North line and 2310 feet from the West line (Unit C) of said Section 16. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well: Said area is located approximately three miles Southeast of Monument, New Mexico.