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March 23, 1999

#### **HAND-DELIVERED**

Lori Wrotenbery, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 2040 South Pacheco Street Santa Fe, New Mexico 87503 12163

OIL CONSTRUCTION DIV.

Re: Application of Shackelford Oil Company for Compulsory Pooling, Lea County, New Mexico

Dear Ms. Wrotenbery:

Enclosed in triplicate is the Application of Shackelford Oil Company in the above-referenced case as well as a copy of the legal advertisement. Shackelford Oil Company requests that this application be set for hearing before a Division Examiner on April 15, 1999.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures

cc: Mr. Don Shackelford (w/enclosures)

Shackelford Oil Company Post Office Box 10665 Midland, Texas 79702

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

IN THE MATTER OF THE APPLICATION OF SHACKELFORD OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO.

#### <u>APPLICATION</u>

Shackelford Oil Company ("Shackelford"), 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 in all formations from the surface to the base of the Delaware formation in the SW/4 SE/4 of Section 3, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and in support thereof states:

- 1. Shackelford is a working interest owner in the SW/4 SE/4 of said Section 3 and has the right to drill thereon.
- 2. Shackelford proposes to dedicate the above-referenced spacing or proration unit to a well to be drilled at a standard location in the SW/4 SE/4 of said Section 3, to a depth sufficient to test any and all formations and/or pools from the surface to the base of the Delaware formation developed on 40-acre spacing which presently includes but is not necessarily limited to the Undesignated Teas Yates-Seven Rivers Pool and the Undesignated West Teas Yates-Seven Rivers Pool.
- 3. Applicant has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the subject spacing units identified on

#### **EXHIBIT A**

# APPLICATION OF SHACKELFORD OIL COMPANY FOR COMPULSORY POOLING SW/4 SE/4 OF SECTION 3, TOWNSHIP 20 SOUTH, RANGE 33 EAST, N.M.P.M. LEA COUNTY, NEW MEXICO

Samson Resources Company 2 West Second Street Tulsa, Oklahoma 74103 Attention: Jay Miller

Merit Energy Partners 12222 Merit Drive Dallas, Texas 75251-2217 Attention: Teresa Wyrick

E.G.L. Resources, Inc. 214 W. Texas, Suite 900 Midland, TX 79702 Attn: Wes Perry

Nearburg Exploration 3300 N. Big Spring Bldg. 2, Suite 120 Midland, TX 79705 Attn: Duke Roush CASE 12/63:

Application of Shackelford Oil Company for compulsory pooling, Lea County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Delaware formation underlying the SW/4 SE/4 (Unit O) of Section 3, Township 20 South, Range 33 East, N.M.P.M. thereby forming a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Undesignated Teas Yates-Seven Rivers Pool and the Undesignated West Teas Yates-Seven Rivers Pool. Said unit is to be dedicated to a well to be drilled at a standard oil well location thereon. 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. The proposed 40-acre unit is located approximately 1 mile north of U. S. Highway 62-180 at mile marker No. 77.