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October 8, 1999

Hand Delivered

Florene Davidson Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Dear Florene:

Enclosed are an original and two copies of an application for hearing de novo, filed on behalf of Pogo Producing Company in Case No. 12223.

Very truly yours,

James Bruce

Actorney for Pogo Producing Company

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

99 OCT -8 PH 10: 38

APPLICATION OF POGO PRODUCING COMPANY FOR APPROVAL OF A PILOT PRESSURE MAINTENANCE PROJECT AND TO QUALIFY THE PROJECT FOR THE RECOVERED OIL TAX RATE PURSUANT TO THE ENHANCED OIL RECOVERY ACT, EDDY COUNTY, NEW MEXICO.

Case No. 12223 Order No. R-11246

APPLICATION FOR HEARING DE NOVO

Pogo Producing Company, a party of record adversely affected by the above order, applies for the above case to be heard de novo by the Oil Conservation Commission pursuant to NMSA 1978 §70-2-13 (1996) and Division Rule 1220.

Respectfully submitted,

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

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Attorney for Pogo Producing Company

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Dames Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

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Attorney for Pogo Producing Company

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION (1) CONSERVATION (1) CONSE

99 OCT -8 PH 10: 38

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Attorney for Pogo Producing Company