

OIL CONSERVATION DIV.

**MILLER, STRATVERT & TORGERSON, P.A.**

LAW OFFICES

ALBUQUERQUE 99 OCT 15 AM 3:34 LAS CRUCES

RANNE B. MILLER  
ALAN C. TORGERSON  
ALICE TOMLINSON LORENZ  
GREGORY W. CHASE  
LYMAN G. SANDY  
STEPHEN M. WILLIAMS  
STEPHAN M. VIDMAR  
ROBERT C. GUTIERREZ  
SETH V. BINGHAM  
JAMES B. COLLINS  
TIMOTHY R. BRIGGS  
RUDOLPH LUCERO  
DEBORAH A. SOLOVE  
GARY L. GORDON  
LAWRENCE R. WHITE  
SHARON P. GROSS  
VIRGINIA ANDERMAN  
MARTE D. LIGHTSTONE  
J. SCOTT HALL  
THOMAS R. MACK  
TERRI L. SAUER  
JOEL T. NEWTON  
THOMAS M. DOMME

RUTH O. PREGENZER  
JEFFREY E. JONES  
MANUEL I. ARRIETA  
ROBIN A. GOBLE  
JAMES R. WOOD  
DANA M. KYLE  
KIRK R. ALLEN  
RUTH M. FUESS  
KYLE M. FINCH  
H. BROOK LASKEY  
KATHERINE W. HALL  
FRED SCHILLER  
LARA L. WHITE  
PAULA G. MAYNES  
DEAN B. CROSS  
MICHAEL C. ROSS  
CARLA PRANDO  
KATHERINE N. BLACKETT  
JENNIFER L. STONE  
ANDREW M. SANCHEZ  
M. DYLAN O'REILLY  
AMINA QUARGNALI-LINSLEY

500 MARQUETTE N.W., SUITE 1100  
POST OFFICE BOX 25687  
ALBUQUERQUE, NM 87125-0687  
TELEPHONE: (505) 842-1950  
(800) 424-7585  
FACSIMILE: (505) 243-4408

500 S. MAIN ST., SUITE 800  
POST OFFICE BOX 1209  
LAS CRUCES, NM 88004-1209  
TELEPHONE: (505) 523-2481  
FACSIMILE: (505) 526-2215

**FARMINGTON**

300 WEST ARRINGTON, SUITE 300  
POST OFFICE BOX 869  
FARMINGTON, NM 87499-0869  
TELEPHONE: (505) 326-4521  
FACSIMILE: (505) 325-5474

**SANTA FE**

150 WASHINGTON AVE., SUITE 300  
POST OFFICE BOX 1986  
SANTA FE, NM 87504-1986  
TELEPHONE: (505) 989-9614  
FACSIMILE: (505) 989-9857

WILLIAM K. STRATVERT, COUNSEL  
PAUL W. ROBINSON, COUNSEL  
RALPH WM. RICHARDS, COUNSEL  
ROSS B. PERKAL, COUNSEL  
JAMES J. WIDLAND, COUNSEL  
BRADLEY D. TEPPER, COUNSEL

PLEASE REPLY TO ALBUQUERQUE  
Writer's Direct Number  
(505) 842-4704  
e-mail: mlightstone@mstlaw.com

October 15, 1999

*Case 12273*

**HAND-DELIVERED**

Mr. Michael E. Stogner  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, NM 87505

Re: Pogo Producing Company's Application for Unorthodox  
Well Location, Section 33, Township 22 South, Range 32  
East, N.M.P.M., Lea County, New Mexico

Dear Mr. Stogner:

On behalf of CNG Producing Company (CNG) and pursuant to Division Rule 104, CNG objects to the September 27, 1999 application of Pogo Producing Company for administrative approval of an unorthodox oil well location for the following well:

Red Tank "33" Fed. Well No. 1  
10 feet FNL & 10 feet FEL  
NE $\frac{1}{4}$ NE $\frac{1}{4}$  (Unit A) Section 33, Township 22 South, Range 32 East, NMPM  
Lea County, New Mexico

CNG is an overriding royalty interest owner in adjoining leases and objects to the requested orthodox well location because the proposed location will unduly harm the adjoining lease interests

Mr. Michael E. Stogner  
October 15, 1999  
Page 2

and will adversely affect correlative rights. Therefore, CNG requests that the matter be set for hearing. Please let Scott Hall or myself know if we may provide additional information.

Very truly yours,



Marte D. Lightstone  
J. Scott Hall

MDL/dcg  
P:\CNG\new case\stogner 101599.doc

c via fax: James Bruce, Attorney for Pogo Producing Company  
Fax. No. (505) 982-2151



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

October 12, 1999

Pogo Producing Company  
c/o James Bruce  
P. O. Box 1056  
Santa Fe, New Mexico 87504

12773

***Re: Administrative application on behalf Pogo Production Company for authorization to drill its Red Tank "33" Federal Well No. 1 in order to test both the Undesignated West Red Tank-Delaware Pool and the Undesignated Red Tank-Bone Spring Pool at an unorthodox oil well location for both intervals 10 feet from the North and East lines (Unit A) of Section 33, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico.***

Dear Mr. Bruce:

This application will require a hearing for further review [see Division Rule 104.F(5)]; it will therefore be placed on the next available docket scheduled for November 4, 1999.

Sincerely,

Michael E. Stogner  
Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division – Hobbs  
U. S. Bureau of Land Management – Carlsbad  
Kathy Valdes, NMOCD – Santa Fe