JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

April 11, 2000

Via Fax and U.S. Mail

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

Dear Florene:

Enclosed are an application for an unorthodox location, and a proposed advertisement, filed on behalf of Home-Stake Oil & Gas Company. Please set this matter for the May 4th Examiner hearing. This application is being filed in the event an offset owner files an objection to an administrative application. Therefore, applicant requests that it be advertised "In the absence of objection, etc." Thank you.

Very truly yours,

James Bruce

Actorney for Home-Stake Oil & Gas Company



(121 12104

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF HOME-STAKE OIL & GAS COMPANY FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO. No. <u>12404</u>

APPLICATION

Home-Stake Oil & Gas Company applies for approval of an unorthodox oil well location in the NW¼NE¼ of Section 27, Township 22 Scuth, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant proposes to drill its Mozingo Well No. 1, at an unorthodox surface location 365 feet from the north line and 1593 feet from the east line (Unit B) of Section 27, to an unorthodox bottcm hole location 150 feet from the north line and 1470 feet from the east line (Unit B) of Section 27, to a depth sufficient to test the Fusselman formation (South McCormack-Silurian Pool).

2. Approval of the unorthodox location will prevent waste and protect correlative rights.

WHEREFORE, applicant requests that the Division enter its order approving the unorthodox oil well location. Applicant requests that in the absence of objection this matter be taken under advisement.

Respectfully submitted,

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Home-Stake Oil & Gas Company

PROPOSED ADVERTISEMENT

Case 12414: Application of Home-Stake Oil & Gas Company for an unorthodox oil well location, Lea County, New Mexico. Applicant seeks approval of an unorthodox oil well location in the Fusselman formation (South McCormack-Silurian Pool) in its Mozingo Well No. 1, to be located at a surface location 365 feet from the north line and 1593 feet from the east line (Unit B), and a bottom hole location 150 feet from the north line and 1470 feet from the east line (Unit B), of Section 27, Township 22 South, Range 37 East, NMPM. The NW4NE4 of Section 27 will be dedicated to the well. The unit is located approximately 4½ miles south of Eunice, New Mexico. IN THE ABSENCE OF OBJECTION THIS CASE WILL BE TAKEN UNDER ADVISEMENT.

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF HOME-STAKE OIL & GAS COMPANY FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO.

No. 12404

APPLICATION

Home-Stake Oil & Gas Company applies for approval of an unorthodox oil well location in the NW¼NE¼ of Section 27, Township 22 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant proposes to drill its Mozingo Well No. 1, at an unorthodox surface location 365 feet from the north line and 1593 feet from the east line (Unit B) of Section 27, to an unorthodox bottom hole location 150 feet from the north line and 1470 feet from the east line (Unit B) of Section 27, to a depth sufficient to test the Fusselman formation (South McCormack-Silurian Pool).

2. Approval of the unorthodox location will prevent waste and protect correlative rights.

WHEREFORE, applicant requests that the Division enter its order approving the unorthodox oil well location. Applicant requests that in the absence of objection this matter be taken under advisement.

Respectfully submitted,

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Home-Stake Oil & Gas Company

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF HOME-STAKE OIL & GAS COMPANY FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO. No. $\frac{1}{2} \frac{2}{3} \frac{4}{9} \frac{4}{3}$

APPLICATION

Home-Stake Oil & Gas Company applies for approval of an unorthodox oil well location in the NW¼NE¼ of Section 27, Township 22 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant proposes to drill its Mozingo Well No. 1, at an unorthodox surface location 365 feet from the north line and 1593 feet from the east line (Unit B) of Section 27, to an unorthodox bottom hole location 150 feet from the north line and 1470 feet from the east line (Unit B) of Section 27, to a depth sufficient to test the Fusselman formation (South McCormack-Silurian Pool).

2. Approval of the unorthodox location will prevent waste and protect correlative rights.

WHEREFORE, applicant requests that the Division enter its order approving the unorthodox oil well location. Applicant requests that in the absence of objection this matter be taken under advisement.

Respectfully submitted,

James Brude Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Home-Stake Oil & Gas Company

PROPOSED ADVERTISEMENT

Case _____: Application of Home-Stake Oil & Gas Company for an unorthodox oil well location, Lea County, New Mexico. Applicant seeks approval of an unorthodox oil well location in the Fusselman formation (South McCormack-Silurian Pool) in its Mozingo Well No. 1, to be located at a surface location 365 feet from the north line and 1593 feet from the east line (Unit B), and a bottom hole location 150 feet from the north line and 1470 feet from the east line (Unit B), of Section 27, Township 22 South, Range 37 East, NMPM. The NW4NE4 of Section 27 will be dedicated to the well. The unit is located approximately 4½ miles south of Eunice, New Mexico. IN THE ABSENCE OF OBJECTION THIS CASE WILL BE TAKEN UNDER ADVISEMENT.

PROPOSED ADVERTISEMENT

Case <u>12909</u>: Application of Home-Stake Oil & Gas Company for an unorthodox oil well location, Lea County, New Mexico. Applicant seeks approval of an unorthodox oil well location in the Fusselman formation (South McCormack-Silurian Pool) in its Mozingo Well No. 1, to be located at a surface location 365 feet from the north line and 1593 feet from the east line (Unit B), and a bottom hole location 150 feet from the north line and 1470 feet from the east line (Unit B), of Section 27, Township 22 South, Range 37 East, NMPM. The NW4NE4 of Section 27 will be dedicated to the well. The unit is located approximately 4½ miles south of Eunice, New Mexico. IN THE ABSENCE OF OBJECTION THIS CASE WILL BE TAKEN UNDER ADVISEMENT.



April 13, 2000

Home-Stake Oil & Gas Company c/o James Bruce P. O. Box 1056 Santa Fe, New Mexico 87504

(ask 12404

Re: Administrative application dated March 21, 2000 for Home-Stake Oil & Gas Company to directionally drill its proposed Mozingo Well No.12 from a surface location 365 feet from the North line and 1593 feet from the East line (Unit B) of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico to an unorthodox bottomhole oil well location within the Undesignated South McCormack-Silurian Pool 150 feet from the North line and 1470 feet from the East line (Unit B) of Section 27.

Dear Mr. Bruce:

On Thursday, April 13, 2000 the Division received an objection from Natalie Kaplan and Fern N. Trevino to the subject application, see copy of a letter attached.

Further, the Division's records indicate that on April 11, 2000 you requested the Division also set this matter for hearing before a Division examiner and styled the advertisement such that in the absence of objection this case would be taken under advisement. Case No. 12404 was assigned this case and is currently docketed for the May 4, 2000 hearing.

Since an objection has been filed Home-Stake Oil & Gas Company is expected to appear, present appropriate testimony to support its request, and be available for cross-examination at the May 4, 2000 hearing.

Should there be questions concerning this matter, please contact me in Santa Fe at (505) 827-8185.

Sincerely,

Michael E. Stogner Chief Hearing Officer/Engineer

 cc: New Mexico Oil Conservation Division – Hobbs Kathy Valdes, NMOCD – Santa Fe
Ms. Fren N. Trevino - Chicago, Illinois