# BEFORE THE OIL CONSERVATION DIVISION NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

APPLICATION OF TEXACO EXPLORATION AND PRODUCTION, INC. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO. **CASE NO. 12637** 

### **AFFIDAVIT**

STATE OF NEW MEXICO	)	
	)	SS
COUNTY OF SANTA FE	)	

William F. Carr, attorney in fact and authorized representative of Texaco Exploration and Production, Inc., the Applicant herein, being first duly sworn, upon oath, states that notice has been given to all interested persons entitled to receive notice of this application under Oil Conservation Division rules, and that notice has been given at the addresses shown on Exhibit "A" attached hereto.

William F. Carr

SUBSCRIBED AND SWORN to before me this 4th day of April, 2001.

Notary Public

My Commission Expires:

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Case No. 12637 Fxhibit No. 4

Case No. 12637 Exhibit No. 4
Submitted by:

Texaco Exploration & Production, Inc.

Hearing Date: April 5, 2001

### **EXHIBIT A**

### **NOTICE LIST**

Sid R. Bass, Inc.
Lee M. Bass, Inc.
Thruline Inc.
Keystone, Inc.
Perry R. Bass, Trustee
c/o Bass Enterprises Production Company
201 Main Street
Fort Worth, Texas 76102-3131

Attention: Wayne Bailey

Devon Energy Production Company, L.P. 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260

Attention: Scott Quillin

### HOLLAND & HART LLP CAMPBELL & CARR

ATTORNEYS AT LAW

DENVER • ASPEN
BOULDER • COLORADO SPRINGS
DENVER TECH CENTER
BILLINGS • BOISE
CHEYENNE • JACKSON HOLE
SALT LAKE CITY • SANTA FE
WASHINGTON, D.C.

SUITE 1
110 NORTH GUADALUPE
SANTA FE, NEW MEXICO B7501-6525
MAILING ADDRESS
P.O. BOX 2208
SANTA FE, NEW MEXICO B7504-2208

TELEPHONE (505) 988-4421 FACSIMILE (505) 983-6043 www.hollandhart.com

March 15, 2001

#### CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Sid R. Bass, Inc.
Lee M. Bass, Inc.
Thruline Inc.
Keystone, Inc.
Perry R. Bass, Trustee
c/o Bass Enterprises Production Company
201 Main Street
Fort Worth, Texas 76102-3131

Attention: Wayne Bailey

Re: Application of Texaco Exploration and Production, Inc. for Compulsory

Pooling, Eddy County, New Mexico

Dear Mr. Bailey:

This letter is to advise you that Texaco Exploration and Production Inc. has filed the enclosed application with the New Mexico Oil Conservation Division seeking the force pooling of certain mineral interests from the surface to the base of the Wolfcamp formation, Remuda-Wolfcamp Pool, in S/2 of Section 24, Township 23 South, Range 29 East, N.M.P.M., Eddy County, New Mexico. Texaco Exploration and Production Inc. proposes to dedicate the referenced pooled units to its Remuda Basin A24" State Well No. 1 which it proposes to drill to a depth sufficient to test all formations to the base of the Wolfcamp formation at a standard location in the SW/4 of said Section 24.

This application has been set for hearing before a Division Examiner on April 5, 2001. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Prehearing Statement three days in advance of a scheduled hearing. This statement must include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party

Wayne Bailey
Bass Enterprises Production Company
March 15, 2001
Page Two

will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Vefy truly yours,

William F. Carr

ATTORNEY FOR TEXACO EXPLORATION &

Domestic Return Receipt

102505-00-M-178

PRODUCTION, INC.

Enclosure

Fort Worth, TX 76102-3131

	SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Pro	<ul> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)  B. Date of Delive  C. Signature  Agent  Address	
WFC 460	Article Addressed to:	D. Is delivery address different from item 1?  Yes  If YES, enter delivery address below:  No	
Postage S	Perry R. Bass, Trustee  C/o Bass Enterprises Production Company 201 Main Street  Fort Worth, TX 76102-3131  3. Service Type  Certified Mail		
Restricted Delivery Fee (Endorsein ent Required)  Total Postage & Fees \$ 3.95		Certified Mail  Express Mail  Registered  Registered	
Rec Thuline, Inc.; Keystone, Inc.;		4. Restricted Delivery? (Extra Fee) ☐ Yes	
Perry R. Bass, Trustee C/o Bass Enterprises Production Company 201 Main Street	2. Article Number (Copy from service label) 1000 0600 0024 3129	1456	

PS Form 3811 July 1999

## HOLLAND & HART LLP AND CAMPBELL & CARR ATTORNEYS AT LAW

DENVER • ASPEN
BOULDER • COLORADO SPRINGS
DENVER TECH CENTER
BILLINGS • BOISE
CHEYENNE • JACKSON HOLE

SALT LAKE CITY • SANTA FE WASHINGTON, D.C.

SUITE 1 110 NORTH GUADALUPE SANTA FE, NEW MEXICO 87501-6525 MAILING ADDRESS P.O. BOX 2208 SANTA FE, NEW MEXICO 87504-2208 TELEPHONE (505) 988-4421 FACSIMILE (505) 983-6043 www.hollandhart.com

March 15, 2001

### CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Devon Energy Production Company, L.P. 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260

Attention: Scott Quillin

Dear Mr. Quillin:

3

3

This letter is to advise you that Texaco Exploration and Production Inc. has filed the enclosed application with the New Mexico Oil Conservation Division seeking the force pooling of certain mineral interests from the surface to the base of the Wolfcamp formation, Remuda-Wolfcamp Pool, in S/2 of Section 24, Township 23 South, Range 29 East, N.M.P.M., Eddy County, New Mexico. Texaco Exploration and Production Inc. proposes to dedicate the referenced pooled units to its Remuda Basin A24" State Well No. 1 which it proposes to drill to a depth sufficient to test all formations to the base of the Wolfcamp formation at a standard location in the SW/4 of said Section 24.

This application has been set for hearing before a Division Examiner on April 5, 2001. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Division Rule 1208 B to file a Prehearing Statement Parties appearing in cases are three days in advance of a sc SENDER: COMPLETE THIS SECTION the names of the COMPLETE THIS SECTION ON DELIVERY rties and their attorneys: lete items 1, 2, and 3. Also complete **U.S. Postal Service** if Restricted Delivery is desired. A. Received by (Please Print Clearly) CERTIFIED MAIL RECEIPT our name and address on the reverse (Domestic Mail Only; No Insurance Coverage Provided) we can return the card to you. C. Signature this card to the back of the mailpiece, he front if space permits. 460 addressed to: D. Is delivery address different from item 1? If YES, enter delivery address below: Energy Production Company, L.P. Postm**et)** th Broadway, Suite 1500 Return Receipt Age (Endorsement Required: 1.50 ma City, OK 73102-8260 Restricted Delivery Fee (Endorsement Required) vice Type Certified Mail
Registered Total Postage & Fees | \$ ☐ Express Mail Return Receipt for Merchandis ☐ Insured Mail 🗖 C.O.D. Devon Energy Production Company, L.P. 4. Restricted Delivery? (Extra Fee) Str mber (Copy from service label) 20 North Broadway, Suite 1500 ☐ Yes Oklahoma City, OK 73102-8260 Cit HHA! SAHL D. .. 11.