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July 12, 2001

Lori Wrotenbery, Director
New Mexico Oil Conservation Division
1220 St. Francis Drive
Santa Fe, New Mexico 87505

Hand Delivered

Case 12705

Re: NMOCD Case No. _____; Application of D.J. Simmons, Inc. for Compulsory Pooling, Rio Arriba County, New Mexico (E/2 Sec. 25, T-25-N, R-3-W, NMPM; Bishop Federal 25 No. 1 well)

Dear Ms. Wrotenbery:

Enclosed are an original and two copies of the Application of D.J. Simmons, Inc. in the above referenced matter. On behalf of the Applicant, we request this matter be set for hearing on the August 9, 2001 Division Examiner hearing docket.

Also enclosed on disk and in hard-copy is a proposed advertisement for the case.

Please note: The lands described in this Application are also the subject of NMOCD Case No. 12635 (Application of McElvain Oil and Gas Properties, Inc. for Compulsory Pooling, Rio Arriba County, New Mexico.)

Yours very truly,

MILLER, STRATVERT & TORGERSON, P.A.

J. Scott Hall

J. Scott Hall

JSH/ao

Enclosure(s) – as stated

Cc: John Byrom w/enclos

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

IN THE MATTER OF THE APPLICATION OF
D. J. SIMMONS, INC. FOR COMPULSORY POOLING,
RIO ARRIBA COUNTY, NEW MEXICO

CASE NO. 12705

APPLICATION

D. J. SIMMONS, INC., by its undersigned attorneys, Miller, Stratvert & Torgerson, P.A., (J. Scott Hall) hereby makes application pursuant to NMSA 1978 Section 70-2-17 (1995) for an order pooling all interests from the surface to the base of the Mesaverde formation underlying the E/2 of Section 25, Township 25 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, to form standard spacing and proration units for any formations and/or pools spaced on 320 acres within said vertical extent, and in support thereof, Applicant would show the Division:

1. Applicant owns certain working interests in and under the E/2 of Section 25, and has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced pooled units to its Bishop Federal 25 No. 1 well to be drilled at a standard location 1,303 feet from the north line and 710 feet from the east line in the NE/NE of said Section 25 to a depth sufficient to test all formations in the pooled intervals, including the Mesaverde formation (Blanco Mesaverde Gas Pool), as well as the Chacra formation and the Gallup-Dakota formation (West Lindrith Gallup-Dakota Oil Pool).
3. Applicant has been unable to obtain voluntary agreement for pooling or farmout from certain other interest owners in the SE/4 of said Section 25.

