

EXHIBIT A

**APPLICATION OF SEELY OIL COMPANY
FOR CONTRACTION OF THE UNITIZED
FORMATION IN THE E-K QUEEN UNIT,
LEA COUNTY, NEW MEXICO**

NOTIFICATION LIST

Boswell Interests Ltd.
1320 Lake Street
Fort Worth, Texas 76102

CEB Oil Company
1320 Lake Street
Fort Worth, Texas 76102

Merlyn W. Dahlin and wife,
Ruth G. Dahlin
3220 North Freeway
Fort Worth, Texas 76111

James Robert Hill, Virginia Glenn Hill
Lattimore and John A. Styrsky, Trustees of
the Houston and Emma Hill Trust Estate
Suite 1802, 500 W. 7th Street, Unit 16
Fort Worth, Texas 76102-4772

PVB Oil Company
1320 Lake Street
Fort Worth, Texas 76102

J. Cleo Thompson and
James Cleo Thompson, Jr., L.P.
325 North St. Paul, Suite 4300
Dallas, Texas 76201

Michael J. Havel and Wife, Kathleen A. Havel
7607 Chalkstone
Dallas, Texas 75248

SSV&H Associates
815 West 10th Street
Fort Worth, Texas 76102

Bureau of Land Management
Attention: Armando Lopez
2909 W. 2nd Street
Roswell, New Mexico 88201

Burnett Oil Company
801 Cherry Street, Suite 1500
Fort Worth, Texas 76102

EAB Oil Company
1320 Lake Street
Fort Worth, Texas 76102

Express Air Drilling, Inc.
3838 Oak Lawn Avenue
Two Turtle Creek Village
Dallas, Texas 75219-4516

Commissioner of Public Lands
New Mexico State Land Office
Attention: Pete Martinez
Post Office Box 1148
Santa Fe, NM 87504-1148

C. W. Seely and wife, Ian B. Seely
815 West 10th Street
Fort Worth, Texas 76102

David L. Henderson and wife,
Dawn Henderson
815 West 10th Street
Fort Worth Texas 76102

WES-TEX Drilling Company, L.P.
P. O. Box 3739
Abilene, Texas 79604

John P. Oil Company
1320 Lake Street
Fort Worth, Texas 76102

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JUN 21 2002

BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Case No. 12891 Exhibit No. 10

Submitted by:

SEELY OIL COMPANY

Hearing Date: July 11, 2002

HOLLAND & HART^{LLP}
ATTORNEYS AT LAW

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

P. O. BOX 2208
SANTA FE, NEW MEXICO 87504-2208
110 NORTH GUADALUPE, SUITE 1
SANTA FE, NEW MEXICO 87501-6525

TELEPHONE (505) 988-4421
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

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JUN 27 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

The proposed contraction of the unitized vertical interval will eliminate from the Unit Area the Penrose member of the Queen formation. There currently is no production from this portion of the Queen formation and no waterflood operations have been conducted in this reservoir. Contraction of the unitized interval in the E-K Queen Unit will enable Seely to form a voluntary unit in the Penrose interval for the purpose of initiating secondary recovery operations. The new unit will be comprised of lands within and outside of the current E-K Queen Unit boundaries will enable the owners of productive acreage in the Penrose member of the Queen formation to share the production from this new unit.

This application has been set for hearing before a Division Examiner on July 11, 2002 at 8:15 a.m. The hearing will be held in the Aztec City Council Chambers located at 201 West Chaco, Aztec, New Mexico. 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 Pre-hearing Statement three days in advance of a scheduled hearing at the Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 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.

HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

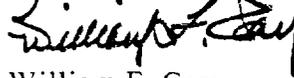
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

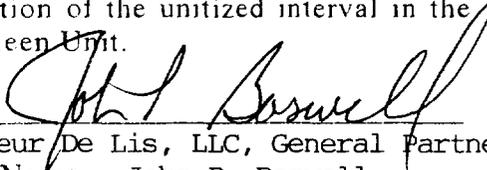
Very truly yours,



William F. Carr
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

Boswell Interests, Ltd.,
through its undersigned authorized
representative, waives objection to the
application of Seely Oil Company for the
contraction of the unitized interval in the
E-K Queen Unit.

By: 

By: Fleur De Lis, LLC, General Partner

Name: John P. Boswell

Title: President

Date: 6/26/02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
ATTORNEYS AT LAW

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HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

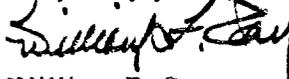
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Your attention to this matter is appreciated.

Very truly yours,



William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

All Companies Listed

through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: _____

Name: John P. Boswell

Title: Vice President

Date: 6/26/02

EAB Oil Company CEB Oil Company
PVB Oil Company John P. Oil Company

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
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William F. Carr

wcarr@hollandhart.com

June 20, 2002



CERTIFIED MAIL
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TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

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HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

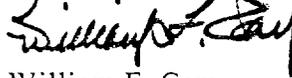
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,

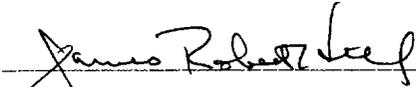


William F. Carr
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

HOUSTON & EMMA HILL TRUST ESTATE
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: _____



Name: JAMES ROBERT HILL
Title: TRUSTEE
Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
ATTORNEYS AT LAW

DENVER - ASPEN
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William F. Carr

wcarr@hollandhart.com

June 20, 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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JUN 25 2002

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

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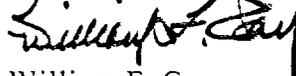
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Very truly yours,

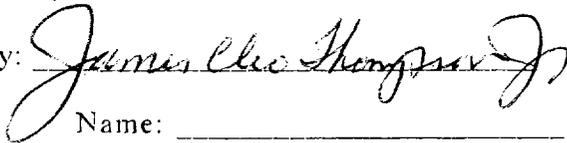


William F. Carr
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

J. Cleo Thompson & James Cleo Thompson, Jr., L.P.

through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: _____

Title: _____

Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART^{LLP}
ATTORNEYS AT LAW

DENVER • ASPEN
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William F. Carr

wcarr@hollandhart.com

June 20, 2002

RECEIVED
JUN 26 2002

CERTIFIED MAIL
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TO ALL AFFECTED PARTIES

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HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

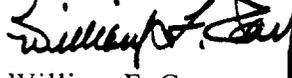
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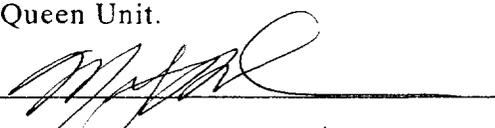


William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

Michael S & Kathleen A Havel
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: MIKE HAVEL
Title: OWNER
Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
ATTORNEYS AT LAW

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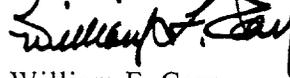
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Your attention to this matter is appreciated.

Very truly yours,



William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

SSV&H Associates,
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: David L. Henderson

Name: David L. Henderson
Title: Managing Partner
Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
ATTORNEYS AT LAW

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BOULDER • COLORADO SPRINGS
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ATTORNEYS AT LAW

June 20, 2002

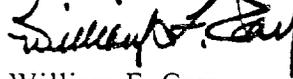
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



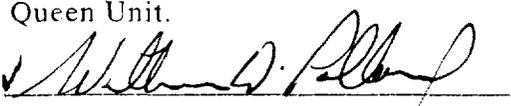
William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

Burnett Oil Company,

through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: **William D. Pollard**

Title: **President of Burnett Oil Co., Inc., Manager of Burnett Oil Company**

Date: **6-25-02**

Enclosure

cc: Mr. Clarence Stumhoffer

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ATTORNEYS AT LAW

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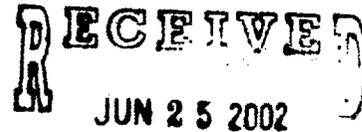
P.O. BOX 2208
SANTA FE, NEW MEXICO 87504-2208
110 NORTH GUADALUPE, SUITE 1
SANTA FE, NEW MEXICO 87501-6526

TELEPHONE (505) 986-4421
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

The proposed contraction of the unitized vertical interval will eliminate from the Unit Area the Penrose member of the Queen formation. There currently is no production from this portion of the Queen formation and no waterflood operations have been conducted in this reservoir. Contraction of the unitized interval in the E-K Queen Unit will enable Seely to form a voluntary unit in the Penrose interval for the purpose of initiating secondary recovery operations. The new unit will be comprised of lands within and outside of the current E-K Queen Unit boundaries will enable the owners of productive acreage in the Penrose member of the Queen formation to share the production from this new unit.

This application has been set for hearing before a Division Examiner on July 11, 2002 at 8:15 a.m. The hearing will be held in the Aztec City Council Chambers located at 201 West Chaco, Aztec, New Mexico. 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 Pre-hearing Statement three days in advance of a scheduled hearing at the Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 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.

HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

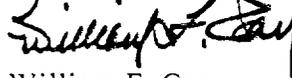
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

EXPRESS AIR DRILLING, INC.,
through its undersigned authorized
representative, waives objection to the
application of Seely Oil Company for the
contraction of the unitized interval in the
E-K Queen Unit.

By: Norm W. Smith

Name: NORMAN W. SMITH

Title: President

Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

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SANTA FE, NEW MEXICO 87504-220E
110 NORTH GUADALUPE, SUITE 1
SANTA FE, NEW MEXICO 87501-6525

TELEPHONE (505) 988-4421
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

RECEIVED
JUN 25 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

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HOLLAND & HART LLP
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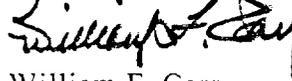
June 20, 2002
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

C. W. Seely and Ina B. Seely,
through its undersigned authorized
representative, waives objection to the
application of Seely Oil Company for the
contraction of the unitized interval in the
E-K Queen Unit.

By: 
Name: CW Seely
Title: _____
Date: 6-24-02

Enclosure

cc: Mr. Clarence Stumhoffer

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P. O. BOX 2206
SANTA FE, NEW MEXICO 87504-2206
110 NORTH GUADALUPE, SUITE 1
SANTA FE, NEW MEXICO 87501-6525

TELEPHONE (505) 988-4421
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
JUN 25 2002

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

The proposed contraction of the unitized vertical interval will eliminate from the Unit Area the Penrose member of the Queen formation. There currently is no production from this portion of the Queen formation and no waterflood operations have been conducted in this reservoir. Contraction of the unitized interval in the E-K Queen Unit will enable Seely to form a voluntary unit in the Penrose interval for the purpose of initiating secondary recovery operations. The new unit will be comprised of lands within and outside of the current E-K Queen Unit boundaries will enable the owners of productive acreage in the Penrose member of the Queen formation to share the production from this new unit.

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HOLLAND & HART LLP
ATTORNEYS AT LAW

June 20, 2002

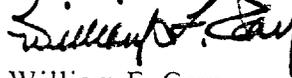
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

David F. Dawn Henderson
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: David F. Dawn Henderson

Name: _____

Title: _____

Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP
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TELEPHONE (505) 988-4421
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

RECEIVED
JUN 26 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

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HOLLAND & HART ^{LLP}
ATTORNEYS AT LAW

June 20, 2002

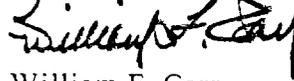
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



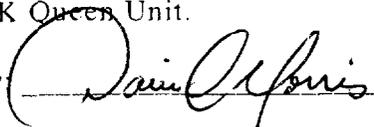
William F. Carr

Attorney for Seely Oil Company

WAIVER OF OBJECTION:

WES-TEX Drilling Company, L.P.
~~BY: WES-TEX Holdings, LLC, General Partner~~
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: _____


Name: David Morris

Title: Executive Vice President

Date: 6/21/02

Enclosure

cc: Mr. Clarence Stumhoffer