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Statement of W. P. Carr, Independent Relating to O. C. C. Case No. 330 and 330-A

W. P. Carr, independent operator, is the owner of interests in the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico, and has production both from the Mesaverde and Pictured Cliffs gas pools in Northwestern New Mexico.

We are convinced that the necessity for prorationing of gas exists in this area for the protection of correlative rights and for the prevention of waste, both present and future.

In order that all producers will be given an equitable opportunity to produce their fair share of the gas we feel a minimum allowable should be set, and suggest on the basis of the production figures offered at the hearing in this case, a minimum allowable of 1,250 cubic feet of gas per acre per day, with the right to commit up to one-half section of land to a well, with credit for any additional land, if larger units are allowed.

We would also suggest a maximum allowable due to the fact the evidence offered tends to show some wells in the pool have a deliverability that does not appear to be related to the reserves in place or to the recoverable reserves. As a figure for this we suggest 2,500,000 cu. ft. per day per well, unless more is required to meet pipe line demand.

As a proration formula the 75% deliverability plus 25% acreage formula appears to be satisfactory.

Respectfully submitted,

W. P. CARR

By: Jason W. Kellahin Attorney