

Robert M. Mader
Oct 27, 1959
JH

BEFORE THE OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF)
JOHN H. TRIGG TO INCLUDE ADDITIONAL)
ACREAGE IN A WATERFLOOD PROJECT IN)
THE CAPROCK QUEEN POOL BY INCLUDING)
THE SE $\frac{1}{4}$ OF SECTION 34, TOWNSHIP 13)
SOUTH, RANGE 31 EAST IN THE JOHN H.)
TRIGG WATER FLOOD PROJECT IN THE)
CAPROCK QUEEN POOL, LEA AND CHAVES)
COUNTIES, NEW MEXICO)

Case No. 1808

APPLICATION

COMES NOW John H. Trigg, by his attorneys, and states:

1. By its Order No. R-1456 the Oil Conservation Commission authorized a pilot waterflood project in the Caprock Queen Pool, Lea and Chaves Counties, New Mexico, and included within the project area all of Section 4, all of Section 9 and the E $\frac{1}{2}$ NE $\frac{1}{4}$ and NE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 5, Township 14 South, Range 31 East.

2. At the time of the issuance of said Order, the Commission found that the SE $\frac{1}{4}$ of Section 34, Township 13 South, Range 31 East need not be included in the project area.

3. Since the aforesaid Order was issued, the waterflood project of Cities Service Oil Company in the Caprock Queen Pool has approached and is now offsetting the SE $\frac{1}{4}$ of Section 34, Township 13 South, Range 31 East.

4. As presented at the hearing in Case No. R-1456, Applicant has a cooperative agreement with Cities Service Oil Company relating to the injection of water in the areas of common boundary between the two projects.

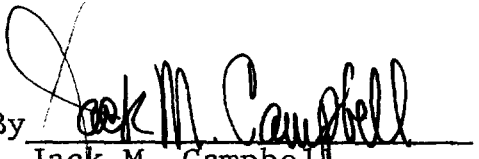
5. It is necessary in order to protect the correlative rights of Applicant and to prevent waste that the SE $\frac{1}{4}$ of Section 34 Township 13 South, Range 13 East be included in the project

authorized by Commission Order No. R-1456.

WHEREFORE, Applicant requests the Commission to set this matter down for hearing before an examiner, to publish notice as required by law and after hearing issue its Order including the SE $\frac{1}{4}$ of Section 34, Township 13 South, Range 31 East, in the John H. Trigg waterflood project in the Caprock Queen Pool, Lea and Chaves Counties, New Mexico.

Respectfully submitted,

CAMPBELL & RUSSELL

By 

Jack M. Campbell
Attorneys for John H. Trigg

P. O. Box 766
Roswell, New Mexico

DATED: October 20, 1959