

CAMPBELL & BLACK, P.A.
LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY
ANNIE-LAURIE COOGAN

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

April 9, 1991

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

RECEIVED

APR 9 1991

OIL CONSERVATION DIVISION

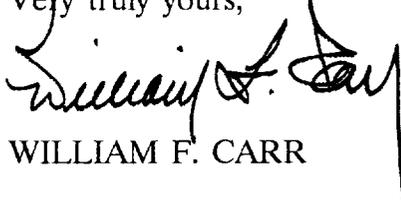
Case 10299

Re: In the Matter of the Application of Collins & Ware, Inc. for Compulsory
Pooling, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Collins & Ware, Inc. in the above-referenced case. Collins & Ware, Inc. respectfully requests that this matter be placed on the docket for the May 2, 1991 Examiner hearings.

Very truly yours,


WILLIAM F. CARR

WFC:mlh

Enclosure

cc w/enclosure: Mr. Bill Seltzer

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

RECEIVED

APR 19 1991

IN THE MATTER OF THE APPLICATION
OF COLLINS & WARE, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE NO. 10299

APPLICATION

COLLINS & WARE, INC., through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat. Ann. § 70-2-17, (1978), for an order pooling all of the mineral interests in all formations developed on 320-acre spacing in the N/2 of Section 13, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and in support thereof states:

1. Applicant owns or represents approximately 87.5% of the working interest in and under the N/2 of Section 13, and Applicant has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be drilled at an unorthodox location 990 feet from the North line and 1750 feet from the East line of said Section 13, to a depth of approximately 13,850 feet to test all formations to the base of the Morrow formation.
3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the N/2 of said Section 13, except for those working interest owners set out on Exhibit "A" to this application.

4. Applicant seeks an exception to the well location requirements of Division Rule 104 to permit the drilling of this well at the above described unorthodox well location.

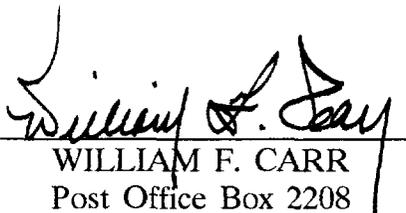
5. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

6. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before an Examiner of the Oil Conservation Division on May 2, 1991 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well, and approving an unorthodox location for this well.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By: 
WILLIAM F. CARR

Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR COLLINS
& WARE, INC.

EXHIBIT A

Glenna V. Anderson
1737 Antigua Way
Newport Beach, CA 92660

A.W. Dugan
1415 Louisiana, Suite 3100
Houston, Texas 77002

Grace Margaret Bads
4367 Deerpark Court
Westlake Village, CA 91361

Ellwood Oil Company
4001 Penbrook
Odessa, TX 79762
Attn: Mr. Frank Hulse, III

Todd M. Wilson
3608 S. County Road 1184
Midland, TX 79701

Anadarko Petroleum Corp.
Post Office Box 2497
Midland, TX 79702
Attn: Mr. Michael R. Goode

Betty F. Hayes
605 Southern Building
Washington, DC 20005

William W. Saunders
606 Ridgemont
San Antonio, TX 78209

Culberson Management Trust
Post Office Box 2918
Midland, TX 79702

Carol Day
1007 Sylvan Meadows Drive
Modesto, CA 95356

Fred T. Newcomb
6834 Variel, No. 28
Canoga Park, CA 91303

Scope Energy Resources
233 Wilshire Blvd., Suite 790
Santa Monica, CA 90401
Attn: Mr. William H. Mannon

Roger T. Elliott
3907 Crestgate
Midland, TX 79707

Barbara Hart
Post Office Box 1209
Gualala, CA 95445

Estate of Shirley Stubbs
36 Bryan Court
Danville, CA 94526
Attn: Ms Judy J. Flick

Grace Petroleum Corp.
Broadway Executive Park
6501 North Broadway
Oklahoma City, OK 73116
Attn: Mr. Randy Upchurch

Scott E. Wilson
4306 Crestgate
Midland, TX 79707

Mitchell Energy Corp.
400 W. Illinois, Suite 1000
Midland, TX 79701
Attn: Mr. Steve Smith

Hondo Oil & Gas Company
Post Office Box 2208
Roswell, NM 88202
Attn: Mr. Ricky D. Raindl

Collins & Ware, Inc.
600 W. Illinois, Suite 701
Midland, TX 79701
Attn: Mr. Brett Smith

James E. Burr
Post Office Box 50233
Midland, TX 79710-0233

Richard Barr
4307 Valley Drive
Midland, TX 79705

Jack Fletcher
Post Office Box 10887
Midland, TX 79702-0887

Santa Fe Energy
500 W. Illinois, 6th Floor
Midland, TX 79701
Attn: Mr. Gary Green

Ronnie H. Westbrook
2809 Haynes
Midland, TX 79705

OXY U.S.A. Inc.
Post Office Box 50250
Midland, TX 79710
Attn: Mr. Pat McGee

Doyle Hartman
500 N. Main Street
Midland, TX 79701

John W. Hendrix
223 W. Wall, Suite 525
Midland, TX 79701

Michael Klein
500 W. Texas, Suite 1230
Midland, TX 79701

James A. Davidson
214 W. Texas, Suite 710
Midland, TX 79701

Larry A. Nermyr
HC-57, Box 4106
Sydney, Montana 59270

Ruth Sutton
2826 Moss
Midland, TX 79705

CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY
ANNIE-LAURIE COOGAN

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

April 10, 1991

HAND-DELIVERED

RECEIVED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

APR 10 1991

OIL CONSERVATION DIV.
SANTA FE

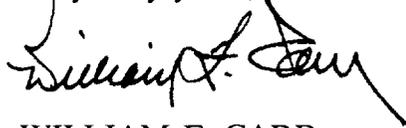
Case 10299

Re: In the Matter of the ~~Amended~~ Application of Collins & Ware, Inc. for
Compulsory Pooling and an Unorthodox Well Location, Lea County, New
Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Amended Application of Collins & Ware, Inc. in the above-referenced case. Collins & Ware, Inc. respectfully requests that this matter be placed on the docket for the May 2, 1991 Examiner hearings.

Very truly yours,



WILLIAM F. CARR

WFC:mlh

Enclosure

cc w/enclosure: Mr. Bill Seltzer

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

RECEIVED

IN THE MATTER OF THE APPLICATION
OF COLLINS & WARE, INC.
FOR COMPULSORY POOLING, AND
AN UNORTHODOX WELL LOCATION,
LEA COUNTY, NEW MEXICO.

APR 10 1991

OIL CONSERVATION DIV
SANTA FE
CASE NO. 10299

AMENDED
APPLICATION

COLLINS & WARE, INC., through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat. Ann. § 70-2-17, (1978), for an order pooling all of the mineral interests in all formations developed on 320-acre spacing in the N/2 of Section 13, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and for an unorthodox well location and in support thereof states:

1. Applicant owns or represents approximately 87.5% of the working interest in and under the N/2 of Section 13, and Applicant has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be drilled at an unorthodox location 990 feet from the North line and 1750 feet from the East line of said Section 13, to a depth of approximately 13,850 feet to test all formations to the base of the Morrow formation.
3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the N/2 of said Section 13, except for those working interest owners set out on Exhibit "A" to this application.

4. Applicant seeks an exception to the well location requirements of Division Rule 104 to permit the drilling of this well at the above described unorthodox well location.

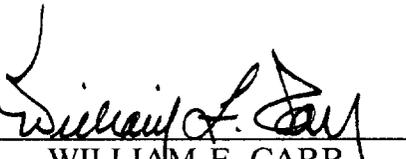
5. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

6. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before an Examiner of the Oil Conservation Division on May 2, 1991 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well, and approving an unorthodox location for this well.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By: 
WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR COLLINS
& WARE, INC.

EXHIBIT A

Glenna V. Anderson
1737 Antigua Way
Newport Beach, CA 92660

A.W. Dugan
1415 Louisiana, Suite 3100
Houston, Texas 77002

Grace Margaret Eads
4367 Deerpark Court
Westlake Village, CA 91361

Ellwood Oil Company
4001 Penbrook
Odessa, TX 79762
Attn: Mr. Frank Hulse, III

Todd M. Wilson
3608 S. County Road 1184
Midland, TX 79701

Anadarko Petroleum Corp.
Post Office Box 2497
Midland, TX 79702
Attn: Mr. Michael R. Goode

Betty F. Hayes
605 Southern Building
Washington, DC 20005

William W. Saunders
606 Ridgemont
San Antonio, TX 78209

Culberson Management Trust
Post Office Box 2918
Midland, TX 79702

Carol Day
1007 Sylvan Meadows Drive
Modesto, CA 95356

Fred T. Newcomb
6834 Variel, No. 28
Canoga Park, CA 91303

Scope Energy Resources
233 Wilshire Blvd., Suite 790
Santa Monica, CA 90401
Attn: Mr. William H. Mannon

Roger T. Elliott
3907 Crestgate
Midland, TX 79707

Barbara Hart
Post Office Box 1209
Gualala, CA 95445

Estate of Shirley Stubbs
36 Bryan Court
Danville, CA 94526
Attn: Ms Judy J. Flick

Grace Petroleum Corp.
Broadway Executive Park
6501 North Broadway
Oklahoma City, OK 73116
Attn: Mr. Randy Upchurch

Scott E. Wilson
4306 Crestgate
Midland, TX 79707

Mitchell Energy Corp.
400 W. Illinois, Suite 1000
Midland, TX 79701
Attn: Mr. Steve Smith

Hondo Oil & Gas Company
Post Office Box 2208
Roswell, NM 88202
Attn: Mr. Ricky D. Raindl

Collins & Ware, Inc.
600 W. Illinois, Suite 701
Midland, TX 79701
Attn: Mr. Brett Smith

Richard Barr
4307 Valley Drive
Midland, TX 79705

Santa Fe Energy
500 W. Illinois, 6th Floor
Midland, TX 79701
Attn: Mr. Gary Green