

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

17 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN  
KAREN AUBREY

TELEPHONE (505) 982-4285  
TELEFAX (505) 982-2047

JASON KELLAHIN  
OF COUNSEL

June 28, 1991

RECEIVED

JUL 2 1991

OIL CONSERVATION DIVISION

Mr. William J. LeMay  
Oil Conservation Division  
State Land Office  
Santa Fe, New Mexico 87504

HAND DELIVERED

Re: Application of Owens Petroleum Inc.  
for Compulsory Pooling,  
Lea County, New Mexico

Case 10350

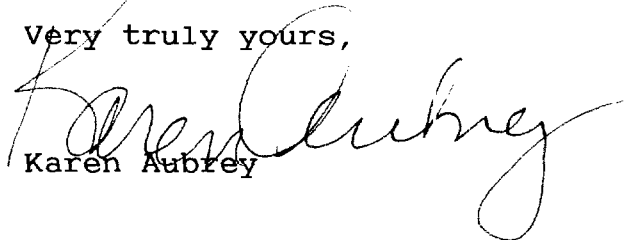
Dear Mr. LeMay:

On behalf of Owens Petroleum Inc., we would appreciate you setting the enclosed Application for a public hearing on the Division's Examiner's docket now scheduled for July 25, 1991.

By copy of this letter to all parties to be pooled, we are notifying them by certified mail-return receipt, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support of or in opposition to the application. Those parties are directed to file a pre-hearing statement with the Division and send a copy to the undersigned not later than 4:00 PM on July 19, 1991.

In addition, these potential parties are advised that the entry of a compulsory pooling order will affect their rights to share in the production from the subject well.

Very truly yours,

  
Karen Aubrey

KA/tic  
Enclosures

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

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OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION  
OF OWENS PETROLEUM INC. FOR  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO

NO. 10350

A P P L I C A T I O N

COMES NOW OWENS PETROLEUM INC., by and through its attorneys, KELLAHIN, KELLAHIN & AUBREY, and applies to the New Mexico Oil Conservation Division for an order pooling all mineral interest from the surface to the base of the Abo formation underlying the following described acreage in Section 18, Township 17 South, Range 35 East, N.M.P.M., Lea County, New Mexico in the following manner:

The E/2SE/4 to form a standard 80-acre oil spacing and proration unit for any and all formations and/or pools developed on 80-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Northern Vacuum-Abo Pool. In support thereof, Applicant states:

1. Applicant has the right to drill in the NE/4SE/4 of Section 18, T17S, R35E, N.M.P.M., Lea County, New Mexico.

2. Applicant desires to drill a well at a standard location 1980 from the South line and 660 from the East line in the NE/4SE/4 of said Section 18 and dedicate the E/2SE/4 (80 acres) to its Shell State No. 1 well.

3. Applicant is informed and believes that the working interest/mineral owners entitled to participate in and pay for the costs of the subject well are as shown on Exhibit "A" attached hereto.

4. Applicant has sought the voluntary agreement of all those parties shown on Exhibit "A" for the formation of the appropriate spacing and proration unit for the drilling of the subject well, but has been unable to obtain a voluntary agreement.

5. Pursuant to the Division notice requirements, applicant has notified all those parties shown on Exhibit "A" of this application for compulsory pooling and its request for a hearing on July 25, 1991, by sending those parties a copy of this application and cover letter.

6. In order to obtain its just and equitable share of the potential production underlying the above tract, applicant needs an order pooling the mineral interest involved in order to protect applicant's correlative rights and prevent waste.

WHEREFORE, applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described herein. Applicant further prays that it be named operator of the well, that the order make provisions for applicant to recover out of production its costs of drilling, completing and equipping it, and costs of operation, including costs of supervision and a risk factor in the amount to be determined by the Division for the drilling and completion of the well and for such other and further relief as may be proper.

Respectfully submitted,

KELLAHIN, KELLAHIN & AUBREY

By:

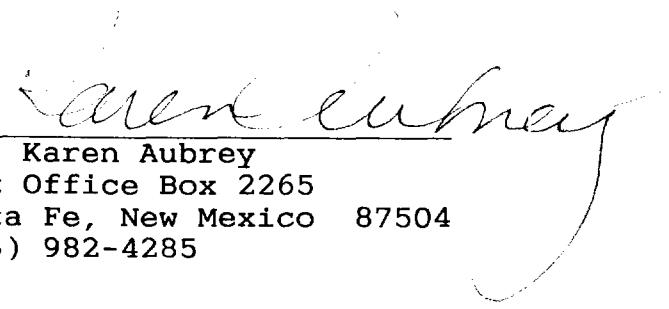
  
Karen Aubrey  
Post Office Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

EXHIBIT "A"

Texaco, Inc.	50.00%
P.O. Box 2100	
Denver, Colorado 80201	

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

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KA/tic  
Enclosures

Mr. William J. LeMay  
June 28, 1991  
Page 2

cc: Mr. Ken Owens  
Owens Petroleum Inc.  
Post Office Box 2911  
Midland, Texas 79702

Certified mail return receipt  
All parties listed on Exhibit "A"  
of application

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

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OF OWENS PETROLEUM INC. FOR  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO

NO. 10350

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3. Applicant is informed and believes that the working interest/mineral owners entitled to participate in and pay for the costs of the subject well are as shown on Exhibit "A" attached hereto.

4. Applicant has sought the voluntary agreement of all those parties shown on Exhibit "A" for the formation of the appropriate spacing and proration unit for the drilling of the subject well, but has been unable to obtain a voluntary agreement.

5. Pursuant to the Division notice requirements, applicant has notified all those parties shown on Exhibit "A" of this application for compulsory pooling and its request for a hearing on July 25, 1991, by sending those parties a copy of this application and cover letter.

6. In order to obtain its just and equitable share of the potential production underlying the above tract, applicant needs an order pooling the mineral interest involved in order to protect applicant's correlative rights and prevent waste.

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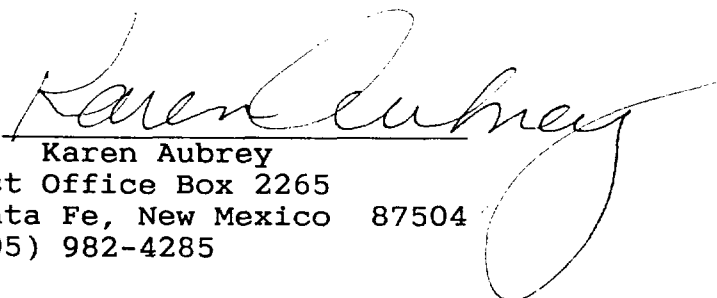
  
Karen Aubrey  
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(505) 982-4285

EXHIBIT "A"

Texaco, Inc.	50.00%
P.O. Box 2100	
Denver, Colorado 80201	

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

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June 28, 1991  
Page 2

cc: Mr. Ken Owens  
Owens Petroleum Inc.  
Post Office Box 2911  
Midland, Texas 79702

Certified mail return receipt  
All parties listed on Exhibit "A"  
of application

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

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NEW MEXICO

OIL CONSERVATION DIVISION

NO. /0350

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Post Office Box 2911  
Midland, Texas 79702

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