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October 7, 1991

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*NOT LICENSED IN NEW MEXICO

Ms. Florene Davidson
New Mexico Oil Conservation
Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Dear Florene:

Enclosed for filing are an original and two copies of an Application for Compulsory Pooling by Pantera Energy Company. Please set this case for the November 7th docket.

Very truly yours,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce
By: James Bruce

JB:le
Enclosures

10411

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF PANTERA ENERGY COMPANY
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.

NO. 10411

APPLICATION

PANTERA ENERGY COMPANY hereby makes application for an order pooling all interests from the surface to the base of the Morrow formation underlying the S/2 of Section 22, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and in support thereof states:

1. Applicant is an interest owner and has the right to drill a well in the S/2 of said Section 22.
2. Applicant proposes to drill its Turkey Track No. 1-22 Well in the S/2 of Section 22, at an orthodox location 1980 from the east line and 660 feet from the south line of the Section, to a depth sufficient to test the Morrow formation, and seeks to dedicate the following acreage to the well:
 - (a) The S/2 of Section 22 for all pools or formations spaced on 320 acres;
 - (b) The SE/4 of Section 22 for all pools or formations spaced on 160 acres;
 - (c) The S/2 SE/4 of Section 22 for all pools or formations spaced on 80 acres; and
 - (d) The SW/4 SE/4 of Section 22 for all pools or formations spaced on 40 acres.

3. The location for the well is an orthodox location.
4. Applicant has in good faith sought to join all other mineral or leasehold interest owners in the S/2 of Section 22 for the purposes set forth herein.
5. Although Applicant attempted to obtain voluntary agreements from all mineral or leasehold interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their acreage. Therefore, Applicant seeks an order pooling all mineral and leasehold interest owners underlying the S/2 of Section 22, as described above, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).
6. Applicant requests the Division to consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating charges and costs charged for supervision. Applicant requests that it be designated as operator of the well and that the Division set a penalty of 200% for the risk involved in drilling the well.
7. The pooling of all interests underlying the S/2 of Section 22, as described above, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that the Division grant the relief requested above.

Respectfully Submitted,

**HINKLE, COX, EASTON, COFFIELD &
HENSLEY**

BY: 

James Bruce
500 Marquette, N.W.
Suite 800
Albuquerque, New Mexico 87102
(505) 768-1500

Attorneys for Applicant

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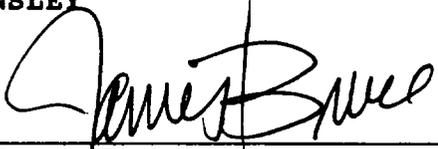
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