## STATE OF NEW MEXICO



## ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

March 12, 1993

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

Hinkle, Cox, Eaton, Coffield & Hensley

Attn: James Bruce P. O. Box 2068

Santa Fe, New Mexico 87504-2068

RE: Case No. 10666

Santa Fe Energy Operating Partners, L.P.

Kansas City Singer "18" Well No. 1

1980' FSL - 660' FEL (Unit I) of Section 18, Township 20 South, Range 27 East,

NMPM, Eddy County, New Mexico.

Dear Mr. Bruce:

After preliminary review of your letter dated February 12, 1993 concerning the subject matter, which was also the first time I've had a chance to review the file in the up-coming Case No. 10666 (also concerning same). It was quit obvious both your application for hearing and letter failed to address the proposed unorthodox gas well location in the McMillan-Morrow Gas Pool. Case No 10666 will be re-advertised to include this omission and to also clarify your application.

With the potential complexity of this issue and due to recent problems with forming non-standard gas spacing and proration units to avoid communitization, this matter will not be processed administratively.

Should you have any questions concerning this matter, please contact me at (505) 827-5811.

Sincerely,

Michael E. Stogner

Chief Hearing Examiner/Engineer

Oil Conservation Division - Artesia

Case File 10666

## HINKLE, COX, EATON, COFFIELD & HENSLEY

LEWIS C COX PAUL W EATON PAUL W EATON
CONRAD E COFFIELD
HAROLD L HENSLEY, JR.
STUART D SHANDR
ERIC D. LANPHERE
C D MARTIN
PAUL J. KELLY, JR
ROBERT P. TINNIN, JR
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNFORD
JOHN J. KELLY
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR

NICHOLAS J. NOEDING
T. CALDER EZZELL, JR
WILLIAM B. BURFORD\*
RICHARD E. OLSON
RICHARD R. WILFONG\*
THOMAS J. MCBRIDE
STEVEN D. ARNOLD
JAMES J. WECHSLER
NANCY S. CUSACK
LEFERGEY, FORNACIAE JEFFREY L. FORNACIARI JEFFREY D. HEWETT JEFFREY D. HEWETT
JAMES BRUCE
JERRY F. SHACKELFORDJEFREY W. HELLBERG\*
ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS\*
GARY D. COMPTON\*
MICHAEL A. GROSS
THOMAS D. HAINES, JR.
GREGORY J. NIBERT
DAVID T. MARKETTE\*
MARK C. DOW KAREN M. RICHARDSON\* FRED W SCHWENDIMANN
JAMES M HUDSON
JEFFREY S. BAIRD\*
MACDONNELL GORDON
PERSONAL MORE CONTROL OF THE PROPERTY O

BETTY H. LITTLE\*
RUTH S MUSGRAVE
ELLEN S. CASEY
S. BARRY PAISNER
MARGARET CARTER LUDEWIG
STEPHEN M. CRAMPTON
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J CLOUTIER
JAMES A GILLESPIE
GREY M. JAPSON GARY W. LARSON
STEPHANIE LANDRY
JOHN R. KULSETH, JR.
MARGARET R. MCNETT
BRIAN T. CARTWRIGHT\*
LISA K. SMITH\*
JAMES KENT SCHUSTER\*
ROBERT H. BETHEA\*
BRADLEY W. HOWARD
CHARLES A. SUTTON\*
NORMAN D. EWART
DARREN T. GROCE\*
MOLLY MCINTOSH MOLLY MOINTOSH

ATTORNEYS AT LAW

218 MONTEZUMA

POST OFFICE BOX 2068 SANTA FE, NEW MEXICO 87504-2068

FAX (505) 982-8623

CLARENCE E. HINKLE (1901-1985) W.E. BONDURANT, JR. (1913-1973) ROY C. SNODGRASS, JR. (1914-1987)

OF COUNSEL
O. M CALHOUN\*
MACK EASLEY
JOE W. WOOD
RICHARD S. MORRIS

WASHINGTON, D.C. ALAN J. STATMAN

700 UNITED BANK PLAZA POST OFFICE BOX IO ROSWELL, NEW MEXICO 88202 (505) 622-6510 FAX (505) 623-9332

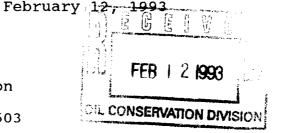
2800 CLAYDESTA CENTER 6 DESTA DRIVE POST OFFICE BOX 3580 (915) 683-4691 FAX (915) 683-6518

1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

500 MARQUETTE N.W., SUITE 800 POST OFFICE BOX 2043 ALBUQUERQUE, NEW MEXICO 87103 (505) 768-1500 FAX (505) 768-I529

\*NOT LICENSED IN NEW MEXICO

William J. LeMay Oil Conservation Division 320 Old Santa Fe Trail Santa Fe, New Mexico 87503



Application for Administrative Approval of Re: a Non-Standard Spacing and Proration Unit, Kansas City Singer "18" No. 1 Well, 1980' FSL and 660' FEL of Section 18, Township 20 South, Range 27 East, N.M.P.M., Eddy

County, New Mexico

Dear Mr. LeMay:

Santa Fe Energy Operating Partners, L.P., hereby applies for administrative approval of a non-standard spacing and proration unit, consisting of the E1 of Section 18, for the above well.

The subject well will be drilled to test the Morrow formation, and is located within the boundaries of the McMillan-Morrow Gas Pool. The pool rules (Order No. R-2917, as made permanent by Order No. R-2917-B) provide for 640 acre spacing. However, Rule 3 permits the Director to approve a non-standard unit if the proposed unit lies wholly within a governmental section, and notice is given to offset operators and operators in the W1 of Section 18. Notice of this application has been given as required by Order No. R-2917,

William J. LeMay February 11, 1993 Page Two

and an affidavit with certified return receipts will subsequently be provided to the Division.

Based on the foregoing, Santa Fe requests approval of the nonstandard  $E^{\frac{1}{2}}$  unit.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

& HENSLEY

James Bruce

Attorneys for Santa Fe Energy Operating Partners, L.P.

JB:frs