

CAMPBELL, CARR, BERGE

& SHERIDAN, P.A.

LAWYERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY

PATRICIA A. MATTHEWS
MICHAEL H. FELDEWERT
DAVID B. LAWRENZ
TANYA M. TRUJILLO

JACK M. CAMPBELL
OF COUNSEL

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

May 3, 1994

HAND-DELIVERED

10984

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

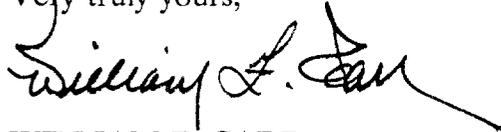
3 1994

Re: Application of Texaco Exploration and Production Inc., for Special Pool Rules
for the Monument-Tubb Pool, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Texaco Exploration and Production Inc., in the
above-referenced case as well as a copy of a legal advertisement. Texaco Exploration and
Production Inc., respectfully requests that this matter be placed on the docket for the May
26, 1994 Examiner hearings.

Very truly yours,



WILLIAM F. CARR

WFC:mlh

Enclosures

cc: Dorothy Brelih (w/enclosures)
Texaco Exploration and Production Inc.
205 East Bender
Hobbs, NM 88240

BEFORE THE
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION
OF TEXACO EXPLORATION AND
PRODUCTION INC., FOR
SPECIAL POOL RULES FOR THE
MONUMENT-TUBB POOL,
LEA COUNTY, NEW MEXICO.

3 1007
CASE NO. 16984

APPLICATION

TEXACO EXPLORATION AND PRODUCTION INC. ("Texaco"), through its undersigned attorneys, makes application to the Oil Conservation Division for amendment of the Special Pool Rules and Regulations for the Monument-Tubb Pool, including a gas-oil ratio of 10,000 cubic feet of gas per barrel of oil produced and in support thereof states:

1. Applicant is an operator of producing wells located in the Monument-Tubb Pool.
2. The Monument-Tubb Pool was created by Oil Conservation Division Order No. R-1532, dated November 23, 1959 and has been expanded from time to time to include the following described acreage:

Township 19 South, Range 37 East, N.M.P.M.

Section 34: S/2

Township 20 South, Range 37 East, N.M.P.M.

Section 3: W/2
Section 8: SE/4
Section 9: E/2, SW/4
Section 10: All
Section 11: W/2, SE/4

Section 12: All
Section 13: N/2
Section 14: NW/4, W/2 SW/4, W/2 NE/4
Section 15: NE/4
Section 16: E/2
Section 20: NE/4
Section 21: N/2
Section 22: N/2
Section 23: W/2

3. The wells in this pool are produced under Special Pool Rules and Regulations which were adopted by Oil Conservation Division Order No. R-3123 dated November 10, 1964 which, among other things, set a gas-oil ratio of 4000 cubic feet of gas per barrel of oil produced.

4. Operating this pool under current rules is not depleting the reservoir in an efficient and timely manner.

5. Applicant seeks amendment of the Special Rules and Regulations for this pool to increase the limiting gas-oil ratio to 10,000 cubic feet of gas per barrel of oil produced.

6. Approval of this application will protect the correlative rights of each operator in this pool by affording each the opportunity to produce its just and equitable share of gas and oil from this pool, will prevent the waste of hydrocarbons and is otherwise in the best interest of conservation.

WHEREFORE, Texaco Exploration and Production Inc., requests that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on May 26, 1994, and after notice and hearing as required by law, the Division enter its Order approving this application.

Respectfully submitted,

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.

By:



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

ATTORNEYS FOR TEXACO
EXPLORATION AND PRODUCTION INC.

CASE _____: Application of Texaco Exploration and Production Inc., for Amendment of the Special Pool Rules and Regulations for the Monument-Tubb Pool, Lea County, New Mexico. Applicant seeks amendment of the Special Pool Rules and Regulations for the Monument-Tubb Pool, located in portions of Township 19 and 20 South, Range 37 East, including a provision for a gas-oil limitation of 10,000 cubic feet of gas per barrel of oil. Said area is located approximately _____ miles _____ of _____, New Mexico.

10/2/91

1991