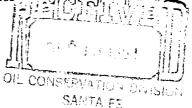
KELLAHIN and KELLAHIN
Attorneys at Law

Jason Kellahin W. Thomas Kellahin Karen Aubrey El Patio - 117 North Guadalupe Post Office Box 2265 Telephone 982-4285 Area Code 505

Santa Fe, New Mexico 87504-2265

December 19, 1984



Mr. Richard L. Stamets
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

"Hand Delivered"

Re: Gary-Williams Oil Producer
Expansion of the Rio Puerco-Mancos
Oil Pool and Amendments thereto,
Sandoval County, New Mexico

Dear Mr. Stamets:

On behalf of the applicant, please find enclosed our application for expansion of the Rio Puerco-Mancos Oil Pool and amendments to the Special Rules and Regulations.

We would request that this case be set for the Division Examiner Hearing now scheduled for January 16, 1985.

M Mhomas

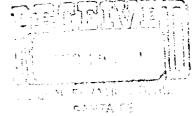
WTK:ca Enc.

CC: Mr. W. P. Marx
 Gary-Williams Oil Producer Inc.
 115 Inverness Drive East
 Englewood, Colorado 80116-5116

All Addressees on Exhibit "A" of Application

# STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF GARY-WILLIAMS OIL PRODUCER, INC. FOR EXPANSION OF THE RIO PUERCO-MANCOS OIL POOL AND FOR AMENDMENT OF CERTAIN SPECIAL RULES AND REGULATIONS, SANDOVAL COUNTY, NEW MEXICO.



CASE:

#### APPLICATION

COMES NOW, GARY-WILLIAMS OIL PRODUCER, INC., by and through its attorneys, KELLAHIN & KELLAHIN, and applies to the New Mexico Oil Conservation Division for the expansion of the RIO PUERCO-MANCOS OIL POOL, for the approval of certain non-standard proration and spacing units and for the amendment of certain special rules for said pool, and in support thereof states:

- Applicant is an operator and working interest owner in the Rio Puerco-Mancos Oil Pool, Sandoval County, New Mexico.
- 2. That the New Mexico Oil Conservation Division established the Rio Puerco-Mancos Oil Pool on March 7, 1984, by Commission Order R-7471 and promulgated certain Special Rules and Regulations, including a provision for 320-acre spacing and proration units.

3. That the present Rio Puerco-Mancos Oil Pool includes the following area:

Township 20 North, Range 2 West, NMPM

Sections 6 and 7: All Section 18: All

Township 20 North, Range 3 West, NMPM

Section 1 through 4: All Sections 9 through 16: All

4. Applicant proposes that the Rio Puerco-Mancos
Oil Pool be expanded to include the following area:

Township 20 North, Range 2 West, NMPM

Sections 3, 4, and 5: All Sections 8, 9, and 10: All Sections 15, 16, and 17: All

Township 21 North, Range 2 West, NMPM

Sections 19 through 22: All Sections 27 through 34: All

Township 20 North, Range 3 West, NMPM

Section 21 through 28: All

Township 21 North, Range 3 West, NMPM

Sections 25 and 26: All Sections 35 and 36: All

- 5. That the proposed expansion for the Rio Puerco-Mancos Oil Pool will include acreage that constitutes the same common sources of supply for the current pool.
- 6. That the Rio-Puerco Mancos Oil Pool, with the inclusion of the expansion area, will allow the operators and working interest owners in the pool to more effectively and efficiently develop the Mancos formation within the pool area.

- 7. That the Mancos formation in the area is a fractured reservoir with low porosity and a matrix permeability that should be conducive for wide spacing.
- 8. That since the Commission entered Order R-7471, some six additional Mancos wells have been drilled.
- 9. That the currently available information for those wells, indicates that one well should be capable of effectively and efficiently draining 320 acres.
- 10. That all of the existing Mancos wells in the expansion area are of standard well locations under the terms of the Special Rules and Regulations of the Rio Puerco-Mancos Oil Pool.
- 11. That the present Special Rules and Regulations for the Rio Puerco-Mancos Oil Pool provide:
- RULE 1. Each well completed or recompleted in the Rio Puerco-Mancos Oil Pool or in a correlative interval  $\tau \omega 0$  within one miles of its boundary, shall be spaced, drilled, operated and produced in accordance with the Special Rules and Regulations hereinafter set forth. NO CHANGE.
- RULE 2. No more than one well shall be completed or recompleted on a standard unit containing 320 acres, more or less, consisting of the N/2, S/2, E/2 or W/2 of a governmental section. NO CHANGE.
- RULE 3. Each well shall be located no nearer than 660 feet to the outer boundary of the spacing or proration

unit, nor nearer than 330 feet to a governmental quarterquarter section line. HOWEVER, THERE WILL BE A MINIMUM OF 1800 FEET BETWEEN WELLS.

RULE 4. The limiting gas-oil ratio shall be 500 cubic feet per barrel of oil. NO CHANGE.

RULE 5. A standard proration unit (316 through 324 acres) shall be subject to a 320-acre depth bracket allowable of 320 barrels per day. The allowable assigned to a non-standard proration unit shall bear the same ratio to a standard allowable as the acreage in such non-standard unit bears to 320 acres. NO CHANGE.

- 12. That in order to prevent the economic loss caused by the drilling of unnecessary wells, and to otherwise prevent waste and protect correlative rights, Rule 3, the present Rio Puerco-Mancos Oil Pool Rules should be amended to provide that wells in the pool shall be no closer than 1800 feet to any well within the pool.
- (13) That as a result of governmental surveys the following sections within the expansion area contain less than a standard 640 acres to the section:

## Township 20 North, Range 2 West

Section 3: Lot 1 (28.76), Lot 2 (28.86), Lot 3 (28.98) Lot 4 (29.08), S/2N/2 S/2 (Total of 595.68) Section 4: Lot 1 (29.19), Lot 2 (29.27), Lot 3 (29.37) Lot 4 (29.45), S/2N/2S/2 (Total of 597.28) Section 5: Lot 1 (29.44), Lot 2 (29.31), Lot 3 (29.19) Lot 4 (29.06), S/2N/2S/2 (Total of 597.00)

#### Township 21 North, Range 2 West

- Section 19: Lot 1 (38.50), Lot 2 (38.70), Lot 3 (38.90), Lot 4 (39.10) E/2W/2E/2 (Total of 635.20) Section 30: Lot 1 (39.27), Lot 2 (39.43), Lot 3 (39.57), Lot 4 (39.73), E/2W/2E/2 (Total of 638.00) Section 31: Lot 1 (39.82), Lot 2 (39.88), Lot 3 (39.92), Lot 4 (39.98), E/2W/2E/2 (Total of 639.60)
- 14. That applicant seeks approval for non-standard proration and spacing units for any Rio Puerco-Mancos Oil Pool well drilled in any of the sections setforth in paragraph (13) above, authorizing the operator for any such well to dedicate one-half of any non-standard section to a Mancos pool well without further order of the Division.
- 15. That a copy of this application has been sent to all owners listed on Exhibit "A" attached hereto.

WHEREFORE, APPLICANT requests that this matter be set for hearing and that after notice and hearing, the application be approved.

Kellahin & Kellahin

W. Thomas Kellahin

P. O. Box 2265 Santa Fe. New/Mexic

Santa Fe, New/Mexico 87501

(505) 982-4285

#### EXHIBIT "A"

### Rio Puerco-Mancos Oil Pool Spaced Area Record Title Owners December 6, 1984

AE Investments, Inc. Attention: Mr. John Lucia 151 Farmington Avenue Hartford, CT 06156

AMR Energy Corporation Attention: Mr. Richard A. Ingwers 1500 Fidelity Union Tower Dallas, TX 75201

Badger Oil Corporation Attention: C. P. Hilliard P. O. Drawer 52745 Lafayette, LA 70505

Benson Minerals Group, Inc. Attention: Mr. Bruce Benson 1536 Cole Blvd., Suite 220 Golden, CO 80401

Benson-Montin-Greer Attention: Mr. Albert R. Greer 221 Petroleum Center Building Farmington, NM 87401

Carlyle Petroleum Inc. Attention: Mr. D. L. Beavers 800-1122 4th Street S.W. Calgary, Alberta, Canada T2R 1M1

Celsius Energy Co. Attention: Mr. Kenneth Wiley P. O. Box 11070 Salt Lake City, UT 84147

Champlin Petroleum Co. Attention: Mr. Larry Lillo P. O. Box 1257 Englewood, CO 80150

Virginia Charlebois %Marv Hagemeier P. O. Box 3339 Casper, WY 82602

Joan Chorney Attention: Mr. Buck Stanley Suite 1000 555 Seventeenth Street Denver, CO 80202-3910 Raymond Chorney Attention: Mr. Buck Stanley Suite 1000 555 Seventeenth Street Denver, CO 80202-3910

George Coleman Coleman Oil & Gas Corporation P. O. Drawer 3337 Farmington, NM 87499

Cramer Oil Company Attention: Mr. Brad Okerlund 410 17th Street, Suite 1340 Denver, CO 80202

GeoVest Drilling Fund 1981 8950 N. Central Expressway Suite 324 Dallas, TX 75231

Gulf Oil Exploration and Production Co. Attention: Mr. Larry Schales P. O. Box 1150 Midland, TX 97902

N. H. Hatch 2200 Sacramento, #70-6 San Francisco, CA 94115

E. G. Hunt Box 2628 Jackson, MS 39205

ICG Petroleum Inc. Attention: Mr. Raymond P. Masniuk 2700-140 Fourth Avenue S.W. Calgary, Alberta, Canada T2P 3S3

JN Oil and Gas Attention: Mr. Gary Nelson 550 N. 31st Street Transwestern III, Suite 220 Billings, MT 59101

Krusen Drilling Ltd. 1981 Attention: Mr. W. Andrew Krusen 1300 Main Street, Suite 1840 First Western Bank Bldg. Houston, TX 77002

#### Page Three

Norcen Energy, Inc. Attention: Mr. John Miller 5575 D.T.C. Parkway, Suite 320 Englewood, CO 80111

R. K. O'Connell P. O. Box 2003 Casper, WY 82602

Morris E. Ogle P. O. Box 992 Casper, WY 82602

Penn Bristol Corporation Attention: Mr. Fred Howard Independence Square Philadelphia, PA 19172

Pitco Production Co. Attention: Mr. Dan Foland 1790 Bok Tower One Williams Center Tulsa, OK 74172

Ronadero Co., Inc. Box 430 Roswell, NM 88201

Robert Rose 711 Polk Street Suite 946 Houston, TX 77002

Billie Robinson Box 1281 Santa Fe, NM 87501

Sanchez-O'Brien Oil and Gas Co. 706 Maher P. O. Box 2986 Laredo, TX 78041

Sandhill 1981 Drilling Program Attention: Mr. Paul Busch 12630 Viscaino Ct. Los Altos Hills, CA 94022

Seabrook Corporation Attention: Mr. Buck Stanley 555 17th Street, Suite 1000 Denver, CO 80202

# Page Four

Texaco Oils, Inc. Attention: Mr. George Poland P. O. Box 2100 Denver, CO 80201

TCPL Resources USA Ltd. Attention: Ms. Mari Snyder 216 16th Street, Suite 1100 Denver, CO 80202

Trend Exploration Limited Attention: Ms. Stanla Kay 777 Grant Street, Suite 600 Denver, CO 80203