Jason Kellahin W. Thomas Kellahin Karen Aubrey

# KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

April 15, 1985

RECEIVED

APR 1 1580

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

OIL CONSERVATION DIVISION

"Hand Delivered"

Re: APC Operating Partnership Lobo-Caudill Wolfcamp Pool

Care 8595

Dear Mr. Stamets:

On behalf of APC Operating Partnership please set the enclosed application for the examiner hearing now scheduled for May 8, 1985.

Very truly yours,

. Thoma**≥**K**∉**llahir

WTK:ca Enc.

cc: APC Operating Partnership

1700 Lincoln Street

Suite 4900

Denver, Colorado 80202-4549

Attn: Ms. Karen Ball

Enstar Petroleum, Inc.

P. O. Box 3546

Midland, Texas 79701

Attn: Mr. Louis Torrans

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

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APR 1

IN THE MATTER OF THE APPLICATION OF APC OPERATING PARTNERSHIP FOR CREATION OF NEW WOLFCAMP OIL POOL, WITH SPECIAL POOL RULES INCLUDING 80-ACRE SPACING AND PRORATION UNITS, LEA COUNTY, NEW MEXICO.

OIL CONSERVANCE . . .

CASE: 8595

### APPLICATION

Comes now APC OPERATING PARTNERSHIP by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for the creation of a new Wolfcamp oil pool with Special Pool Rules including provisions for 80 acre spacing and proration units, and in support thereof would show:

- 1. Applicant is the operator of the Gilliam Well #1 located in Unit I being the NE/4SE/4 of Section 2, T15S, R36E, NMPM.
- 2. That the Gilliam Well #1 is a development well for a new Wolfcamp oil pool.
- 3. That Enstar Petroleum, Inc. (Union Texas Petroleum Corporation) is the operator of the Scott #1 well located in Unit L being the NW/4SW/4 of Section 1, T15S, R36E, NMPM, which also produces oil from the proposed new Wolfcamp Oil Pool.

- 4. That Enstar Petroleum, Inc. (Union Texas Petroleum Corporation) joins in and supports the applicant herein.
- 5. That applicant believes that the creation of a new pool in the Wolfcamp formation with the adoption of Special Pool Rules including a provision for 80-acre spacing and proration units for a temporary period of one year will be the most efficient and effective method in which to promote the development of said pool and avoid the drilling of unnecessary wells.
- 6. Applicant proposes that the Special Pool Rules include, but not be limited, to the following:
  - (a) well locations not closer than 330 feet to any side boundary of an 80-acre proration and spacing unit:
  - (b) no more than one well per 80-acre proration and spacing unit;
  - (c) proration and spacing units to consist of either the N/2; S/2; W/2; or E/2 of any governmental quarter section.
- 7. That approval of the application will be in the best interest of conservation, the prevention of waste, the protection of correlative rights and will avoid the drilling of unnecessary wells.

WHEREFORE, applicant requests that this application be granted after notice and hearing.

Respectfully submitted,

W. Thomas Kellahin P. O. Box 2265

Santa Fe, New Mexico

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#### BEFORE THE

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#### OIL CONSERVATION DIVISION

CIL CONSERVATION DIVISION

#### NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION' OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

Case No. 8793 Order R-8153

APPLICATION OF UNION TEXAS PETROLEUM CORPORATION FOR A NON-STANDARD SPACING AND PRORATION UNIT, LEA COUNTY, NEW MEXICO.

## APPLICATION FOR REHEARING

Comes now, UNION TEXAS PETROLEUM CORPORATION, a party of record adversely affected by Order R-8153, and hereby moves the Commission pursuant to Section 70-2-25, N.M.S.A. (1978 Comp.) for rehearing in the above-referenced case, and in support thereof states:

A. Order R-8153 is arbitrary, capricious, unreasonable and contrary to law. Order R-8153 is contrary to the statutory duties of the Oil Conservation Commission to protect the correlative rights of interest owners in the NW/4 SW/4 of Section 1, Township 15 South, Range 36 East, N.M.P.M., Lea County, New Mexico, and the Scott No. 1 Well located thereon for it requires each interest owner in this acreage to reduce their interest in the Scott No. 1 Well by 50% by sharing the production from the NW/4 SW/4 of Section 1 with the owners of acreage which was shown by uncontroverted evidence at the time of hearing to be outside