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

Case 8665

RECE IED

July 8, 1985

JUL 6 1985

TL CONSERVATION DIVISION

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

Re: Mewbourne Oil Company

Rock Tank Upper and Lower Morrow Gas Pool

Eddy County, New Mexico

Dear Mr. Stamets:

The enclosed application on behalf of Mewbourne Oil Company is a request for approval of a non-standard 320-acres spacing and proration unit and for approval of an unorthodox well location. We would appreciate you setting this application for hearing at the next available Examiner's Hearing now scheduled for July 31, 1985.

Very truly yours

Thomas Tellahin

WTK:ca Enc.

cc: Monsanto Oil Company
1300 One First City Center
500 W. Texas
Midland, Texas 79701
Attn: James D. Cobb, Jr.

Adobe Oil & Gas Corporation 110 Western United Life Building Midland, Texas 79701 Attn: Ron Holcomp

Yates Petroleum Corporation Yates Building, 207 South 4th Artesia, New Mexico 88210 Attn: Randy G. Patterson

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> Amoco Production Company P. O. Box 3092 Houston, Texas 77253 Attn: Jim Allen

Santa Fe Exploration Company P. O. Box 1136 Roswell, New Mexico 88202

Robert L. Kincaid & Sons c/o Matt Chew Allen & Chew 7045 Third Avenue Scottsdale, Arizona 85251

Mr. & Mrs. William G. Smith Queen Route Carlsbad, New Mexico 88220

Cities Service Corporation P. O. Box 1919 Midland, Texas 79702 Attn: Mr. E. F. Motter

Bill Mathis Box 2414 Midland, Texas 79701

Cactus Resources, Inc. 13747 Montford Drive Suite 300 Dallas, Texas 75240

Bureau of Land Management P. O. Box 1449 Santa Fe, New Mexico 87501

Federal Land Bank
P. O. Box 1694
Roswell, New Mexico 88201
Attn: Rance Miles

Carlsbad National Bank P. O. Box 1359 Carlsbad, New Mexico 88220

KELLAHIN and KELLAHIN

Mr. Richard L. Stamets July 8, 1985 Page 3

> Mr. Paul Haden Mewbourne Oil Company 1010 Wall Towers West Midland, Texas 79701

> Mr. Robert C. Senning Mewbourne Oil Company 1010 Wall Towers West Midland, Texas 79701

Gary L. Winter Mewbourne Oil Company 20 North Broadway, Suite 1600 Oklahoma City, Oklahoma 73102

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

RECEIVED

IN THE MATTER OF THE APPLICATION OF MEWBOURNE OIL COMPANY FOR APPROVAL OF A NON-STANDARD SPACING AND PRORATION UNIT AND FOR AN UNORTHODOX GAS WELL LOCATION, ROCK TANK UPPER AND LOWER MORROW GAS POOL, EDDY COUNTY, NEW MEXICO.

STEEL 8 1985

OIL CONSERVATION DIVISION

CASE: 8665

APPLICATION

Comes now MEWBOURNE OIL COMPANY, by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for approval of a 320-acre non-standard proration and spacing unit consisting of the N/2 of Section 13, T23S, R24E, NMPM, Eddy County, New Mexico and for approval of an unorthodox gas well location 660 feet from the North line and 1980 feet from the West line of said section, and in support thereof states:

- Applicant is an operator in Section 13, T23S,
 R24E, NMPM, Eddy County, New Mexico.
- 2. Applicant desires to drill a well at a location 660 feet from the North line and 1980 feet from the West line of said Section 13, to test the Morrow and Atoka formation.

- 3. That the subject well is subject to the Rock Tank Upper and Lower Morrow Gas Pool rules which provide for 640 acre spacing and proration units and for well locations not closer than 1650 from the sides of a section.
- 4. That applicant is unable to form a standard 640-acres spacing and proration unit in Section 13 because of title problems in the W/2SW/4 of Section 13.
- 5. That the Rock Tank Upper and Lower Morrow Gas Pools were established by Division Order R-3428 entered June 6, 1968.
- 6. That since its establishment, this pool has been fully developed on 640-acres.
- 7. That applicant believes that its location in Section 13 will not adversely affect offsetting operators because its well is not likely to drain more than 320 acres.
- 8. That rather than amend the pool rules, applicant believes that the most equitable method for further development of its interests in Section 13 will be the approval of a non-standard 320-acres proration and spacing unit consisting of the N/2 of section 13.
- 9. That a copy of this application is being mailed to all affected interest owners within Section 13 and to all offsetting operators that may be affected by this application.

WHEREFORE, applicant requests that this application be set for hearing before the Division's Examiner and that after notice and hearing the application be granted as requested.

Kellahin & Kellahin

P. O. Box 2265 Santa Fe, New Mexico 87501