Jason Kellahin W. Thomas Kellah n

Karen Aubrey James B. Grant KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4235 Area Code 505

February 22, 1984

Mr. Joe D. Ramey Oil Conservation Division P. J. Box 2088 Santa Fe, New Mexico 87501

"Hand Delivered"

Re: Robert M. Edsel Company

Dear Mr. Ramey:

Please set the enclosed forced pooling application for hearing on March 14, 1984.

Very truly yours,

Orginal citted by W. THOMAS KELLAHIN W. Thomas Kellahin

WTK:ca Enc.

cc: James Edsel Robert M. Edsel Company 4200 Thanksgiving Tower Dallas, Texas 75201

> Mr. Wilson E. Scott 1100 Milam Building Suite 4460 Houston, Texas 77002

"Certified Mail"

/ Ernest Padilla, Esq. Attorney at Law P. O. Box 2523 Santa Fe, New Mexico 87501

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

IN THE MATTER OF THE APPLICATION OF ROBERT M. EDSEL, INC. FOR COMPJLSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE:\_\_\_\_\_

## APPLICATION

Comes now ROBERT M. EDSEL, INC., and applies to the Oil Conservation Division of New Mexico for an order pooling all mineral interests in the Wolfcamp Formation for a spacing and proration unit consisting of the SE/4NW/4 and NE/4EW/4 Section 1, Township 15 South, Range 36 East, NMPM, Lea County, New Mexico.

 Applicant is the owner of the right to drill and develop the SE/4NW/4 and NE/4SW/4 of Section 1, Township 15 South, Range 36 East, NMPM.

Applicant has drilled a Wolfcamp test in said
Section 1.

3. Applicant has sought the cooperation of all parties involved in the drilling of the well.

4. In the event voluntary efforts are unsuccessful, it is necessary for the applicant to have a forced pooling case heard by the Division on March 14, 1984.

5. The party who has not yet consented to the pooling of his royalty interest as proposed is as follows:

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Wilson E. Scott 1100 Miliam Building Suite 4460 Houston, Texas 77002 a royalty interest underlying the SE/4NW/4 of Section 1, T15S, R36E, NMPM

6. In order to obtain their just and equitable share of the production underlying the above lands, Applicant needs an order pooling the mineral interest involved.

7. The party names in paragraph 5 above has been furnished a copy of this application.

WHEREFORE, applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described herein. Applicant further prays that it be named operator of the well, and that the order make provisions for applicant to recover out of production its costs of drilling the subject well, completing and equipping it, costs of operation, including costs of supervision and a risk factor in the amount of 200% for the drilling of the well, for such other and further relief as may be proper.

Respectfully submitted,

ROBERT M. EDSEL, INC.

Original signed by By W. THOMAS KELLAHIN W. Thomas Kellahin P. O. Box 2265 Santa Fe, New Mexico 87501 (505) 982-4285 Attorneys for applicant

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