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

IN THE MATTER OF THE APPLICATION
OF JEROME P. MCHUGH AND ASSOCIATES
FOR AN AMENDMENT TO THE SPECIAL
RULES AND REGULATIONS OF THE
GAVILAN MANCOS OIL POOL TO
ESTABLISH TEMPORARY SPECIAL PRODUCTION
ALLOWABLE LIMITATIONS AND GAS-OIL
RATIO LIMITATIONS FOR THE GAVILAN
OIL POOL, RIO ARRIBA COUNTY,
NEW MEXICO.

RECEIVED

JUL 1 1986

OIL CONSERVATION DIVISION

CASE: 8946

APPLICATION OF JEROME P. MCHUGH

Comes now JEROME P. MCHUGH AND ASSOCIATES, by and through their attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for the establishment of a Temporary Gas-Oil Ratio limitation of not more than 1,000 cubic feet of gas for each barrel of oil produced AND an allowable or not more than 200 barrels of oil per day per 320 acre spacing and proration unit for the Gavilan Mancos Oil Pool, Rio Arriba County, New Mexico, OR IN THE ALTERNATIVE a similar production limitation formula that will preserve reservoir energy and prevent waste, and in support thereof would show:

- Applicant is an operator in the Gavilan Mancos
 Pool, Rio Arriba County, New Mexico.
- 2. At the request of the applicant, the Oil Conservation Division entered Division Order R-7407

creating and adopting temporary operating rules for the Gavilan-Mancos Oil Pool, Rio Arriba County, New Mexico.

- 3. The current producing wells in the Gavilan-Mancos Oil Pool are allowed to produce at a 2000 to 1 gas-oil ratio established by Statewide Rule 506, and are further authorized to produce at a maximum daily allowable rate of 772 barrels a day, as authorized by statewide Rule 505.
- 4. Currently available geologic and engineering data demonstrates that the statewide GOR and allowables applied to the Gavilan-Mancos Oil Pool are resulting in the inefficient use of the reservoir energy and are causing waste to occur.
- 5. That the reservoir characteristics of the subject pool justify the establishment of a temporary gas-oil limitation of 1,000 cubic feet of gas per barrel of oil and a production limitation on allowables of not more than 200 barrels of oil per day per 320 acre spacing unit.
- 6. That applicant believes that a Gas Oil Ratio of not more than 1,000 and a daily allowable of not more than 200 barrels a day per well is necessary in order to prevent waste, increase ultimate oil recovery, and to preserve reservoir energy.
- 7. That in order to prevent waste and protect correlative rights immediate action needs to be taken to

reduce the GOR and the production rates on pool wells for a period of not less than 90 days.

8. In accordance with Division Order R-8054 applicant has notified, by regular mail, all operators of wells and each unleased mineral owner within the existing pool boundaries and all operators of wells within one mile of such boundary, all as set forth on Exhibit A attached hereto.

WHEREFORE, applicant requests that the Division set this matter for hearing and that after notice and hearing the Division establish a temporary special 1,000 to 1 GOR and a maximum allowable of 200 barrels of oil per day per 320 acre spacing unit, for the Gavilan Mancos Oil Pool, OR IN THE ALTERNATIVE, a similar production limitation formula that will preserve reservoir energy and prevent waste.

Kellahin & Kellahin

W. Thomas Kellahin

P. O. Box 2265

Santa Fe, NM 87501

(505) 982-4285

EXHIBIT A

GAVILAN WORKING INTEREST OWNERS ADDRESSEE LIST

Amoco Production Company 1670 Broadway P. O. Box 800 Denver, Colorado 80201 Attention: Richard Bottjer

ARCO Oil and Gas Company Permian District P. O. Box 1610 Midland, Texas 79702 Attention: T. S. McCorkle

Arriba Co., Ltd. P. O. Box 35304 Tulsa, Oklahoma 74153 Attention: G. L. Morris

Robert L. Bayless P. O. Box 168 Farmington, New Mexico 87499

Chevron U.S.A. P. O. Box 599 Denver, Colorado 80201 Attention: Randy Hagood

Warren Clark Trust Mabel Reed, Trustee P. O. Box 1846 Austin, Texas 78767

Testamentary Trust under the Will of Warren Clark Mabel Reed and H. M. Reed, Trustees P. O. Box 1846 Austin, Texas 78767

Carolyn Clark Oatman P. O. Box 1846 Austin, Texas 78767

Conoco Inc.
P. O. Box 460
726 East Michigan
Hobbs, New Mexico 88240
Attention: Donald W. Johnson

Crestone Energy Corporation 718 17th Street, Suite 520 Denver, Colorado 80202 Attention: Randall C. Thompson

Mr. Jerry K. Debolt 272 Church Center Road McMurray, Pennsylvania 15317

Dugan Production Corp. P. 0. Box 208 Farmington, New Mexico 87499 Attention: Robert G. Stovall

Mr. Steve S. Dunn 3100 Western Farmington, New Mexico 87401

Mr. Ralph Gilliland 7420 Caruth Dallas, Texas 75225

Mrs. Ardis North Hamilton 141 East South Street Worthington, Ohio 43085

Rear Admiral Thomas J. Hamilton 7580 Caminito Avola La Jolla, California 92037

Ms. Janet J. Hewes c/o The Johnson Offices 90 Cricket Avenue Ardmore, Pennsylvania 19003

A. G. Hill, Oil Producer 5000 Thanksgiving Tower Dallas, Texas 75201 Attention: Philip Garner

Hooper, Kimball and Williams, Inc. P. O. Box 520970 Tulsa, Oklahoma 74152 Attention: George Owens Gavilan Working Interest Owners Addressee Listing Page Two

Ibex Partnership
P. 0. Box 911
Breckenridge, Texas 76024

Mr. Eldridge R. Johnson c/o The Johnson Offices 90 Cricket Avenue Ardmore, Pennsylvania 19003

Mr. George F. Johnson c/o The Johnson Offices 90 Cricket Avenue Ardmore, Pennsylvania 19003

Kenai Oil and Gas Inc. One Barclay Plaza 1675 Larimer Street, Suite 500 Denver, Colorado 80202 Attention: Joseph R. Mazzola

Kindermac Partners 650 South Cherry Street, Suite 1225 Denver, Colorado 80222

Koch Exploration
P. O. Box 2256
Wichita, Kansas 67201
Attention: Carl Pomeroy

Mallon Oil Company 1616 Glenarm Place, Suite 2850 Denver, Colorado 80202 Attention: Kevin Fitzgerald

Jerome P. McHugh 650 South Cherry Street, Suite 1225 Denver, Colorado 80222

McHugh Lindrith 1982 Ltd. Partnership 650 South Cherry Street, Suite 1225 Denver, Colorado 80222

McHugh Lindrith 1983 Ltd. Partnership 650 South Cherry Street, Suite 1225 Denver, Colorado 80222 Mr. Horace F. McKay, Jr. P. O. Box 14738 Albuquerque, New Mexico 87191

Meridian Oil Inc. P. O. Box 4289 Farmington, New Mexico 87499-4289 Attention: Land Department

Mr. J. Gregory Merrion
P. O. Box 840
Farmington, New Mexico 87499

Merrion Oil and Gas Corp. P. O. Box 840 Farmington, New Mexico 87499 Attention: Steve Dunn

Mesa Grande, Ltd. 1305 Philtower Building Tulsa, Oklahoma 74103 Attention: Larry Sweet

Mesa Grande Resources, Inc. 1200 Philtower Building Tulsa, Oklahoma 74103 Attention: Gregory Phillips

Mrs. Anne K. Milinovich 64 Sycamore Street Waynesburg, Pennsylvania 15370

Mobil Producing Texas & New Mexico P. O. Box 633 Midland, Texas 79702 Attention: John Faulhaber

Mountain States Natural Gas Corp. P. O. Box 35426 Tulsa, Oklahoma 74543 Attention: Jack Blair

PC, Ltd. P. O. Box 911 Breckenridge, Texas 76024

EXHIBIT A

Gavilan Working Interest Owners Addressee Listing Page Three

Mr. Paul J. Puglia 294 West Wayne Street Waynesburg, Pennsylvania 15370

Reading & Bates Petroleum Company 3200 Mid-Continent Tower Tulsa, Oklahoma 74103 Attention: Eric Koelling

Tenneco Oil Company P. O. Box 3249 Englewood, Colorado 80155 Attention: George Calstrom

Texaco Oils Inc.
P. O. Box 2100
Denver, Colorado 80201
Attention: Bill Smallwood

True Oil Company
P. O. Drawer 2360
Casper, Wyoming 82602
Attention: Tom Walker

Duer Wagner, Jr. 2906 Texas American Bank Building Fort Worth, Texas 76102

Duer Wagner, III 2906 Texas American Bank Building Fort Worth, Texas 76102

Mr. Hunt Walker P. O. Box 2409 Denver, Colorado 80201-2409

Bob Andes P. O. Box 1067 Farmington, New Mexico 87499 W. E. Lang P. O. Box 1067 Farmington, New Mexico 87499

Southern Union Exploration Company Texas Federal Building Suite 400 1217 Main Street Dallas, Texas 75202

EXHIBIT A

Dunn-Mar Oil and Gas Company 27 S. College St. Washington, Pennsylvania 15301

Northwest Pipeline Corp. 295 Chipeta Way Salt Lake City, Utah 84108

Michael W. Murphy 200 N. Jefferson, Suite 500 El Dorado, Arkansas 71730

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

Union Texas Petroleum Corp. 14001 E. Iliff Ave., Suite 500 Aurora, Colorado 80014

Benson-Montin-Greer Drilling Corp. 221 Petroluem Center Building Farmington, New Mexico 87401

U. S. Department of the Interior Bureau of Land Management P. O. Box 6770 Albuquerque, New Mexico 87197 Attention: Gary Stephens

Schalk Development Co. P. O. Box 25825 Albuquerque, New Mexico 87125

Edith H. Payne 1018 Idlewilde Lane S.E. Albuquerque, New Mexico 87191

Kodiak Petroleum, Inc. American Penn Energy, Inc. 5700 S. Quebec, #320 Englewood, Colorado 80111

Allison Beach c/o William A. Martin 430 Mayo Building Tulsa, Oklahoma 74103 David Beach c/o William A. Martin 430 Mayo Building Tulsa, Oklahoma 74103

Betsey Stone c/o William A. Martin 430 Mayo Building Tulsa, Oklahoma 74103

Daniel Beach c/o William A. Martin 430 Mayo Building Tulsa, Oklahoma 74103

Priscilla B. Guest c/o William A. Martin 430 Mayo Building Tulsa, Oklahoma 74103

Helmerich & Payne, Inc. 1579 E. 21st St. Tulsa, Oklahoma 74114

Forest Oil Corporation 700 Colorado Federal Building 821 - 17th Street Denver, Colorado 80202

Peter J. McMahon and Grace F. McMahon, Trustees under Trust Agreement dated December 1, 1981 320 S. Boston Ave., Suite 1605 Tulsa, Oklahoma 74103