MONTGOMERY & ANDREWS

OF COUNSEL A. K. Montgomery

J. O. Seth (1883-1963) Frank Andrews (1914-1981)

> Sarah M. Singleton Jay R. Hone

John M. Hickey Mack E. With

Galen M. Buller

Helen C. Sturm

Richard L. Puglisi

Arturo Rodriquez Joan M. Waters

Terri A. Mazur

Stephen R. Kotz

Christine Gray

James C. Murphy

James R. Jurgens

Ann M. Maloney

Roger L. Prucino

Deborah S. Dungan

Kay E. Mares

Helen L. Stirling

Rosalise Olson

Deborah J. Van Vleck Anne B. Hemenway

Katherine W. Hall

Edmund H. Kendrick

Charles W. N. Thompson, Jr.

Seth D. Montgomery

Victor R Ortega

John B. Pound

Bruce Herr

Gary R. Kilpatric

Thomas W. Olson

William C. Madison

Walter J Melendres

Michael W. Brennan

Robert P. Worcester James C. Compton

Nancy M. Anderson Alison K. Schuler

Janet McL. McKay

Jean-Nikole Wells

Mark F. Sheridan Joseph E. Earnest

Stephen S. Hamilton

W. Perry Pearce Stephen J. Rhoades

Michael H. Harbour

Brad V. Coryell

Robert J. Mroz

John B. Draper

Jeffrey R. Brannen

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

December 31, 1986

HAND-DELIVERED

SANTA FE OFFICE 325 Paseo de Peralta Post Office Box 2307 Santa Fe, New Mexico 87504-2307

> Telephone (505) 982-3873 Telecopy (505) 982-4289

ALBUQUERQUE OFFICE Suite 500 7 Broadway Place 707 Broadway, N.E. Post Office Box 26927 Albuquerque, New Mexico 87125-6927

Telephone (505) 242-9677

LOS ALAMOS OFFICE Suite 120 901 18th Street Los Alamos, New Mexico 87544

Telephone (505) 662-0005

REPLY TO SANTA FE OFFICE

OIL CONSERVATION DIVISION

RECEIVED 7064 DEC 3: 1986

Richard L. Stamets, Director Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail Santa Fe, New Mexico 87501

Amerind Oil Company Application for

An Unorthodox Well Location, Shipp-Strawn Pool

Dear Mr. Stamets:

I am enclosing an original and two copies of an application for an unorthodox well location for Amerind Oil Company. would appreciate your setting this matter for hearing on the next available hearing examiner docket, which I understand to be January 21, 1987. I have previously telephoned this application to the Division on December 29, 1986 in order to meet the deadline for publication of the docket.

Thank you for your assistance with this matter.

Sincerely yours,

Edmund H. Kendrick

EHK: dm1 Enclosures

Robert C. Leibrock (w/enclosure)

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

RECEIVED

DEC 5 1000

OIL CLASSINVATION DIVISION

Case No: 1/2/24

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR APPROVAL OF AN UNORTHODOX WELL LOCATION, SHIPP-STRAWN POOL, LEA COUNTY, NEW MEXICO.

APPLICATION

AMERIND OIL COMPANY, by its attorneys, Montgomery & Andrews, P.A., applies to the New Mexico Oil Conservation Division for approval of an unorthodox well location 1350 feet FNL and 2130 feet FEL, Section 3, Township 17S, Range 37E, Shipp-Strawn Pool, Lea County, New Mexico and in support thereof would show:

- 1. That applicant is the operator of the south half northeast quarter of Section 3, Township 17S, Range 37E, Lea County, New Mexico, and proposes to dedicate that acreage to a well to be drilled in an unorthodox location 1350 feet FNL and 2130 feet FEL in this tract for production from the Shipp-Strawn Pool.
- 2. That Rule 4 of the Special Rules and Regulations for the Shipp-Strawn Pool requires wells to be located within 150 feet of the center of a governmental quarter quarter section, and Rule 2 of those Special Rules and Regulations provides that each well drilled into said Pool shall be located on a standard proration unit containing 80 acres.

- 3. That applicant seeks an exception to the well location requirements of Rule 4 so that it can locate the subject well at the optimum geologic location from which to develop the south half northeast quarter of said section.
- 4. That the unorthodox location reduces the risk that would otherwise occur at a standard location.
- 5. That approval of the requested location provides the applicant with the opportunity to test the Shipp-Strawn Pool at the best location, thereby increasing the opportunity to recover any oil that may be located within the south half northeast quarter of said section.

WHEREFORE, applicant requests that, after notice and hearing, the application be granted as requested.

Respectfully submitted,
MONTGOMERY & ANDREWS, P.A.

Edmund H. Kendrick

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873