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SANTA FE, NEW MEXICO 87504-2523

(505) 988-7577

December 23, 1986

*Case 9067*

RECEIVED

Hand Delivery

DEC 23 1986

OIL CONSERVATION DIVISION

Mr. Victor T. Lyon  
Acting Director  
Oil Conservation Division  
Santa Fe, New Mexico 87501

Re: Pennzoil application to amend Order R-8366, Case  
No. 9003.

Dear Mr. Lyon:

After reviewing Mr. Kellahin's letter of December 22, 1986 and after consultation with my client's (Barbara Fasken) engineering staff we object to the Pennzoil request as proposed by Mr. Kellahin's letter.

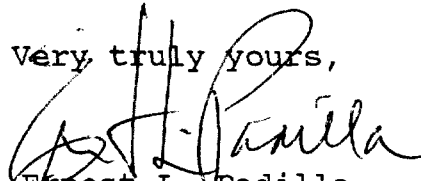
Pennzoil's application in case 9003 was hotly contested and took nearly an entire day to hear. No mention of a typographical condition was ever mentioned during the hearing. Such a condition - as an academic and practical matter - should have been ascertained prior to hearing.

To allow the well to be drilled at another location now without benefit of hearing would be improper. A new case should be advertized and should proceed to hearing as requested on January 21, 1987.

We further object to the proposed advertizement of the case on the basis of the evidentiary conditions placed on application. All parties affected should have an

Mr. Victor T. Lyon  
December 23, 1986  
Page 2

opportunity to re-evaluate the impact of the proposed new location.

Very truly yours,  
  
Ernest L. Padilla

ELP/ys

c: James Groce  
W. Thomas Kellahin, Esquire  
Jim Bruce, Esquire  
Peter Ives, Esquire

KELLAHIN and KELLAHIN

*Attorneys at Law*

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Area Code 505

W. Thomas Kellahin

Karen Aubrey

Jason Kellahin

Of Counsel

January 9, 1987

RECEIVED

JAN 9

Mr. Charles Roybal  
Acting Director  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504

OIL CONSERVATION DIVISION

"Hand Delivered"

Re: Pennzoil Company  
Viersen Well #3  
Commission Order R-8366  
Case 9003

Dear Mr. Roybal:

By letter dated December 22, 1986, on behalf of Pennzoil Company, we filed an application for a hearing to be held on January 21, 1987, to amend the approved unorthodox location due to the topographical conditions.

While page one of that December 22, 1986 letter contained the correct description, page two of that letter contained an obvious typographical error by showing the requested amended location to be 2800 feet from the east line of Section 4. The correct location, is in fact, 2080 feet from the east line and 150 feet from the south line of Section 4.

This typographical error has been corrected and the advertisement by the Division for the hearing is correct.

Very truly yours,



W. Thomas Kellahin

WTK:ca

cc: Joe Pettit (Pennzoil)  
Earnest L. Padilla, Esq.  
Peter Ives, Esq.  
James Bruce, Esq.

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION



GARREY CARRUTHERS  
GOVERNOR

March 26, 1987

POST OFFICE BOX 2088  
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SANTA FE, NEW MEXICO 87501  
(505) 827-5800

Mr. Thomas Kellahin  
Kellahin & Kellahin  
Attorneys at Law  
Post Office Box 2265  
Santa Fe, New Mexico

Re: CASE NO. 9067  
ORDER NO. R-8366-A

Applicant:

Pennzoil Company

Dear Sir:

Enclosed herewith are two copies of the above-referenced  
Division order recently entered in the subject case.

Sincerely,

*Florence Davidson*

FLORENE DAVIDSON  
OC Staff Specialist

Copy of order also sent to:

Hobbs OCD x  
Artesia OCD x  
Aztec OCD           

Other James Bruce