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Of Counsel

July 29, 1987

William J. LeMay
Director
Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504-2088

Case 9203

Re: Application re Ingle Fed. Comm. #1

Dear Mr. LeMay:

Enclosed please find the Application of Sun Exploration and Production Company for compulsory pooling in Section 22, Township 13 South, Range 34 East, Lea County, New Mexico. We would appreciate it if this matter could be set on the August 26, 1987 Examiner Docket.

Sincerely,



Karen Aubrey

KA/jo

Enclosures

cc: Allen R. Tubb, Sun Exploration
& Production Company
Gary Cox, Texaco

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OIL CONSERVATION DIVISION

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

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION
OF SUN EXPLORATION AND PRODUCTION
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

CASE NO. 9203

APPLICATION

COMES NOW, Sun Exploration and Production Company and applies to the Oil Conservation Division of the State of New Mexico for an order pooling all mineral interests from the surface to 10,500 feet or the base of the Bough "D" (Upper Pennsylvanian), underlying the SW/4 of Section 22, Township 13 South, Range 34 East, Lea County, New Mexico for the formation of a proration spacing unit to be dedicated to said well and in support thereof would show the Commission:

1. Applicant is the owner of the right to drill and develop the SW/4 of Section 22, Township 13 South, Range 34 East, Lea County, New Mexico.

2. Applicant proposes to drill its Ingle Fed. Comm. #1 Well at a standard location and to dedicate the SW/4 of said Section to the well.

3. Applicant has sought to obtain the cooperation and voluntary participation of all parties.

4. In order to obtain its just and equitable share of the production underlying the above lands, Applicant needs an order pooling the mineral interests involved.

5. Those who have not consented to join in the drilling of the well, with their addresses to the best of Applicant's knowledge and belief are as follows:

Texaco, Inc.

Post Office Box 2100

Denver, Colorado 80201

Attn: Gary Cox

The foregoing interest totals twenty-five percent (25%) working interest.

6. The party named in paragraph 5 above has been furnished a copy of this Application.


WHEREFORE, Applicant requests that this matter be set for hearing before the Division's duly appointed Examiner, and that, after notice and hearing, the application be granted as requested. Applicant furthers prays that it be named operator of said Well, and that the Order make provision for Applicant to recover, out of production, its costs of drilling the

subject well, completing and equipping it, all costs of operation, including costs of supervision and a risk factor in the amount of two hundred percent (200%) for the drilling of the Well and for such other and further relief as may be appropriate.

Respectfully submitted,

KELLAHIN, KELLAHIN & AUBREY
Post Office Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

By


Karen Aubrey

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Application to be mailed to:

Texaco, Inc.

Post Office Box 2100

Denver, Colorado 80201

Attn: Gary Cox

by certified mail, return receipt requested on this 30th
day of July, 1987.

