## STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS & NATURAL RESOURCES OIL CONSERVATION DIVISION RECEIVED

SEP 7 1988

IN THE MATTER OF THE APPLICATION OF MOBIL EXPLORATION & PRODUCING U.S. AS AGENT FOR MOBIL PRODUCING TEXAS-NEW MEXICO, INC. FOR COMPULSORY POOLING, RIO ARRIBA COUNTY, NEW MEXICO.

OII	CONSERVATION	DIVISION
OIL	COMPENANTION	•

Case No.

9492

## APPLICATION

Comes now Mobil Exploration & Producing U.S. as agent for Mobil Producing Texas-New Mexico, Inc. by and through its attorneys, Montgomery & Andrews, P.A., and applies to the Oil Conservation Division as follows:

Applicant seeks an order pooling all mineral interests in the West Puerto Chiquito Mancos Oil Pool underlying Section 34, Township 24 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico to form a standard 640 acre spacing and proration unit to be dedicated to a well at a standard location thereon. In addition, applicant seeks the pooling of all mineral interests underlying the south half of that section to form a standard 320 acre spacing and proration unit in the Basin Dakota Pool.

In support thereof applicant states that:

1. Applicant is the owner of an interest in and has a right to drill and develop a portion of the lands within

Section 34, Township 24 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico.

- 2. In accordance with the New Mexico Oil and Gas Act and the Rules and Regulations of the Oil Conservation Division, applicant has:
- (a) Sought voluntary agreement among the owners within said Section 34.
- (b) Failed to reach voluntary agreement with other interest owners in said Section 34.
- 3. As part of this application, applicant further requests that it be named operator of the well to be drilled on a standard 640 acre spacing unit within Section 34, that the order make provision for applicant to recover out of the production from such well its costs of drilling the subject well and its costs for completing and equipping it, costs of operation of the well, including costs of supervision and a risk factor in the amount of 200% of the costs of drilling, completing and equipping the well.
- 4. Pursuant to division notice requirement, applicant has given notice as required by Rule 1207 to Jerome P. McHugh and Associates, Kindermac Partners and Nassau Resources at their address of 650 S. Cherry Street, Suite 1225, Denver, Colorado 80222, and asks that this case be set for hearing before the Oil Conservation Division on September 28, 1988.

WHEREFORE, applicant requests that this application be set for hearing and that after notice and hearing its requested relief be granted.

APPLICATION - Page 2

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

W. Perry Pearde Post Office Sox 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

[WPP:148]