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October 31, 1988

RECEIVED

#### HAND-DELIVERED

OCT 3 1 1988

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
OIL CONSERVATION DIVISION
OF 532

State Land Office Building Santa Fe, New Mexico 87503

Re: In the Matter of the Application of Amerind Oil Company

for Compulsory Pooling, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed is an Application of Amerind Oil Company in the above-referenced case. Amerind respectfully requests that this matter be placed on the docket for the Examiner hearings scheduled on November 22, 1988.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures

cc w/enclosures: Mr. Bill Seltzer

Amerind Oil Company

#### BEFORE THE

# OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

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IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

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THE SUPPLEMENTION DIVERGE NO. 9532

# APPLICATION

AMERIND OIL COMPANY by and through its undersigned attorneys, hereby makes application pursuant to Section 70-2-17, N.M.S.A. (1978), for an order pooling all of the mineral interests from the surface to the base of the Strawn formation for any and all formations and/or pools developed on 80-acre spacing in and under the E/2 SE/4 of Section 2, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns or represents approximately 75% of the working interest in and under the E/2 SE/4 of Section 2, and Applicant has the right to drill thereon.
- 2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be located at a standard location in the E/2 SE/4 of said Section 2 and drilled to a depth sufficient to test the Shipp-Strawn Pool.
- 3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the E/2 SE/4 of said Section 2 except for Texaco, Inc. the owner of a 25% working interest.

4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and the Applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on November 22, 1988, and that after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well, and making such other and further provisions as may be proper in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAN F. CARR

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ATTORNEYS FOR AMERIND OIL COMPANY

#### BEFORE THE

# OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

OCT 5 - 1200 CASE NO. 9532

HEDEWED

# APPLICATION

AMERIND OIL COMPANY by and through its undersigned attorneys, hereby makes application pursuant to Section 70-2-17, N.M.S.A. (1978), for an order pooling all of the mineral interests from the surface to the base of the Strawn formation for any and all formations and/or pools developed on 80-acre spacing in and under the E/2 SE/4 of Section 2, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns or represents approximately 75% of the working interest in and under the E/2 SE/4 of Section 2, and Applicant has the right to drill thereon.
- 2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be located at a standard location in the E/2 SE/4 of said Section 2 and drilled to a depth sufficient to test the Shipp-Strawn Pool.
- 3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the E/2 SE/4 of said Section 2 except for Texaco, Inc. the owner of a 25% working interest.

4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and the Applicant should be designated the operator of the well to be drilled.

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Respectfully submitted,

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WILLIAM E CARR

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ATTORNEYS FOR AMERIND OIL COMPANY

#### BEFORE THE

#### OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

COLLARD

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 9532

# APPLICATION

AMERIND OIL COMPANY by and through its undersigned attorneys, hereby makes application pursuant to Section 70-2-17, N.M.S.A. (1978), for an order pooling all of the mineral interests from the surface to the base of the Strawn formation for any and all formations and/or pools developed on 80-acre spacing in and under the E/2 SE/4 of Section 2, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns or represents approximately 75% of the working interest in and under the E/2 SE/4 of Section 2, and Applicant has the right to drill thereon.
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Respectfully submitted,

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