HINKLE, COX, EATON, COFFIELD & HENSLEY

ATTORNEYS AT LAW

218 MONTEZUMA

POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554

FAX (505) 982-8623

CLARENCE E HINKLE (1901-1985) W E. BONDURANT, JR (1913-1973) ROY C. SNODGRASS, JR. (1914-1987)

> OF COUNSEL O M CALHOUN MACK EASLEY JOE W WOOD RICHARD 5 MORRIS

WASHINGTON, D.C. SPECIAL COUNSEL ALAN J. STATMAN

June 22, 1993

700 UNITED BANK PLAZA POST OFFICE BOX IO ROSWELL, NEW MEXICO 88202 (505) 622-6510 FAX (505) 623-9332

2800 CLAYDESTA CENTER 6 DESTA DRIVE POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691 FAX (915) 683-6518

1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

500 MARQUETTE N.W., SUITE 800 POST OFFICE BOX 2043 ALBUQUERQUE, NEW MEXICO 87103 (505) 768-1500 FAX (505) 768-1529

*NOT LICENSED IN NEW MEXICO

LEWIS C. COX

LEWIS C. COX
PAUL W. EATON
CONRAD E. COFFIELD
HAROLD L. HENSLEY, JR.
STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
ROBERT P. TINNIN, JR
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNSFORD

DOUGLAS L. LUNSFORD JOHN J. KELLY

JOHN J. KELLY
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR
WILLIAM B. BURFORD*
RICHARD E. CLSON
RICHARD R. WILFONG*
THOMAS J. MCBRIDE
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY D. HEWETT
JAMES BRUCE

JAMES BRUCE
JERRY F. SHACKELFORD*
JEFFREY W HELLBERG*
ALBERT L PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS*
GARY D. COMPTON*

MICHAEL A. GROSS THOMAS D. HAINES, JR.

GREGORY J. NIBERT

DAVID T MARKETTE*

MARK C. DOW

JAMES BRUCE

Florene Davidson Oil Conservation Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87503

FRED W. SCHWENDIMANN

JAMES M. HUDSON
JEFFREY S. BAIRD*
REBECCA NICHOLS JOHNSON
WILLIAM P. JOHNSON
STANLEY K. KOTOVSKY, JR
H. R. THOMAS
ELLEN S. CASEY
MARGARET CARTER LUDEWIG

JAMES M. HUDSON

S. BARRY PAISNER

STEPHEN M. CRAMPTON MARTIN MEYERS

MARTIM MEYERS
GREGORY S. WHEELER
ANDREW J CLOUTIER
JAMES A GILLESPIE
GARY W. LARSON
STEPHANIE LANDRY
JOHN R. KULSETH, JR
MARGARET R. MCNETT
BRIAN T CARTWRIGHT*
LISA K. SMITH*
LOGGETH BETHER.

ROBERT H. BETHEA*
BRADLEY W. HOWARD
CHARLES A SUTTON

CHARLES A SUTTON NORMAN D EWART DARREN T. GROCE* MOLLY MCINTOSH MARCIA B. LINCOLN SCCTT A. SHUART*

DARREN L. BROOKS

CHRISTINE E. LALE

DARLA M. SILVA

Dear Florene:

Enclosed are an original and two copies of an application by Santa Fe Energy Operating Partners, L.P. for compulsory pooling and an unorthodox well location. Please set this case for the July 15, 1993 Examiner hearing. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD & HENSLEY

OIL CONSERVATION DIVISION

James Bruce Bull

JB:frs Enclosures

VIA HAND DELIVERY

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF SANTA FE ENERGY OPERATING
PARTNERS, L.P. FOR COMPULSORY POOLING AND
AN UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

APPLICATION
OIL CONSERVATION DIVISION.

Santa Fe Energy Operating Partners, L.P. hereby makes application for an order pooling all mineral interests from the surface to the base of the Cisco/Canyon formation underlying all of Section 8, Township 22 South, Range 24 East, N.M.P.M., Eddy County, New Mexico, and for an unorthodox well location, and in support thereof states:

- 1. Applicant is an interest owner and has the right to drill a well in said Section 8.
- 2. Applicant proposes to re-enter the Amoco Fed. Azotea Mesa No. 1-8 Well, located 743 feet from the North line and 1055 feet from the West line of Section 8, and drill to a depth sufficient to test the Cisco/Canyon formation, and seeks to dedicate all of Section 8 for all pools or formations spaced on 640 acres (including the Indian Basin-Upper Pennsylvanian Gas Pool).
- 3. In the alternative, in the event special pool rules are promulgated for the W^{1}_{2} of Section 17 pursuant to Case No. 10,748, and Section 8 is aimed to be governed by said rules, Applicant requests that the S^{1}_{2} of Section 8, from the surface to the base of the Cisco/Canyon formation, be pooled for all pools and formations

spaced on 320 acres. The $S^{\frac{1}{2}}$ of Section 8 will be dedicated to a well to be drilled at a standard location.

- 4. Applicant has in good faith sought to join all other mineral or leasehold interest owners in Section 8 for the purposes set forth herein.
- 5. Although Applicant attempted to obtain voluntary agreements from all mineral or leasehold interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their acreage. Therefore, Applicant seeks an order pooling all mineral and leasehold interest owners underlying Section 8, as described above, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).
- 6. Applicant requests the Division to consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating charges and costs charged for supervision. Applicant requests that it be designated as operator of the well and that the Division set a penalty of 200% for the risk involved in drilling the well.
- 6. The above well location is unorthodox for 640 acre units by reason of being too near the outer boundary of the unit, and too near the quarter-quarter section line, and applicant requests approval of said location.
 - 7. The pooling of all interests underlying all of Section 8,

as described above, and the granting of the unorthodox well location, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that the Division grant the relief requested above.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

Attorneys for Applicant