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June 11, 1987

Case 4/62

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JUN 1 1 1987

OIL CONSERVATION DIVISION

HAND DELIVERED

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy and Minerals State Land Office Building Santa Fe, New Mexico 87503

Re: Application of Amerind Oil Company for Compulsory Pooling and a Non-Standard Spacing Unit,

Lea County, New Mexico.

Dear Mr. LeMay:

Enclosed in triplicate is the 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 July 1, 1987.

Very truly yours,

WILLIAM F. CARR

WFC/ab Enclosures

cc w/enclosure: Bill Seltzer

Amerind Oil Company

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY AND MINERAL SED

JUN 1 1 198 '

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING AND A NON-STANDARD SPACING UNIT, LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE NO. 9/62

APPLICATION

COMES NOW AMERIND OIL COMPANY, by and through its undersigned attorneys, and as provided by Section 70-2-17, N.M.S.A. (1978), hereby makes application for an order pooling all of the mineral interests in the Strawn and Atoka formations in and under a non-standard spacing unit to be comprised of the SW/4 SE/4 and the SE/4 SW/4 of Section 28, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns or represents approximately 52% of the working interest in and under the SW/4 SE/4 and SE/4 SW/4 of Section 28, 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 on said pooled unit.

- 3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the SW/4 SE/4 and SW/4 SE/4 of said Section 28, except for the working interest owners and mineral interest owners identified on Exhibit A to this application.
- 4. Applicant seeks an exception to Rule 2 of the Special Rules and Regulations for the Casey-Strawn Pool for an 80-acre non-standard unit to be comprised of the SW/4 SE/4 and the SE/4 SW/4 of Section 28.
- 5. Said non-standard spacing unit and pooling of the interests therein will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.
- 6. 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 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 July 1, 1987, 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.

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

ATTORNEYS FOR AMERIND OIL COMPANY

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY AND MINERELECTION

JUN 19 1:13

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING AND A NON-STANDARD SPACING UNIT, LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE NO. 9/62

AMENDED APPLICATION

COMES NOW AMERIND OIL COMPANY, by and through its undersigned attorneys, and as provided by Section 70-2-17, N.M.S.A. (1978), hereby makes application for an order pooling all of the mineral interests in the Strawn and Atoka formations in and under a non-standard spacing unit to be comprised of the SW/4 SE/4 and the SE/4 SW/4 of Section 28, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof would show the Division:

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- 2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be located at a standard location on said pooled unit.

- 3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the SW/4 SE/4 and SE/4 SW/4 of said Section 28, except for the working interest owners and mineral interest owners identified on Exhibit A to this application.
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- 6. 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 Applicant should be designated the operator of the well to be drilled.

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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.

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

ATTORNEYS FOR AMERIND OIL COMPANY

EXHIBIT A

AMERIND OIL COMPANY

INTEREST OWNER LIST

Florence M. and Frank B. Balkam 919 North Federal Mason City, Iowa 50401

Roy G. Barton, Jr.
Post Office Box 978
Hobbs, New Mexico 88240

Doris Kennedy Baumgartner Bruce Kennedy Baumgartner Dexter Kay Baumgartner Duva Baumgartner Hill Maida Baumgartner Latvis Mason City, Iowa 50401

Helen M. Brewer address unknown

Arthur and Helga Briston Roland, Iowa 50236

Louis E. and Ana Brooker Mason City, Iowa 50401

O.H. Brown, Annie I. Brown H. Frank Porawski Audrain, Missouri 65232

W. C. Caldwell address unknown

Nick D. Christakos c/o Ourania Christakos 1345 - 6th Ave., Apt. #1 Des Moines, Iowa 50314

Evan Christiansen Lake Mills, Iowa 50450

Clifford Cone Post Office Box 1509 Lovington, N. M. 88260

Douglas L. Cone Post Office Box 13612 Albuquerque, N.M. 87123 Kenneth Cone Post Office Box 11310 Midland, Texas 79702

Conoco, Inc. 200 North Lorraine Street Midland, Texas 79701 Attn: David Twomey

Elizabeth C. Corbett Humboldt, Iowa 50548

J. Patrick Corrigan, J. Edward Corrigan, & Hugh Corrigan IV c/o Mr. Clem Ware 2500 Castleford Road Midland, Texas 79705

Ellen A. Crepow Mason City, Iowa 50401

Floy Mae & Joel O. Mawhinney Dennis 8840 Crawford Avenue Sun Valley, Ca. 91352

Lillian Mabel Drew address unknown

Alex H. and Maggie Johnson Duncan address unknown

Henry R. and Effie M. Elvidge address unknown

J. D. and Myrtle I. Evans Madison, Wisconsin 53701

Felmont Oil Corporation
Post Office Box 2266
Midland, Texas 79702
Attn: Robert N. Hinson

Clifford K. and Hazel Ferguson Rolland S. and Fay Ferguson K.L. & Marjorie A. Mendenhall Pearl L. Brechler address unknown Henrietta L. McDermott Fisher 3440 Grand Avenue Des Moines, Iowa 50312

Frederick M. and Alta Grace Mason City, Iowa 50401

Clifford and Clara Gray Mason City, Iowa 50401

Ada L. Grew address unknown

Mary E. Grisso c/o Harry J. Schafer Post Office Box 14667 Oklahoma City, Ok. 73113

C. A. & Lillian W. Hansen Mason City, Iowa 50401

Earl L. and Kathryn Hansen Swea City, Iowa 50590

Frances M. Heffron, Clara Agnes Sofranko, Gerald L. Sofranko, Eleanora Sofranko Lovila, Iowa 50150

C. F. Hemphill Mason City, Iowa 50401

Heritage Resources
Post Office Box 777
Davis, Oklahoma 73030
Attn: Brian Healey

Mildred L. Hitchcock address unknown

F. C. Holmes Hampton, Iowa 50441

The Home-Stake Royalty Corp. The Home-Stake Oil & Gas Co. 2800 First National Tower Tulsa, Oklahoma 74103

W. A. Horn 630 - 33rd Avenue San Francisco, Ca. 94121 Fred Kemper address unknown

Cynthia E. Larson and Charles B. Larson Paola, Kansas 66071

Cora I. Lohr Law and G. L. Law Humboldt, Iowa 50548

Coates Energy Trust and Elizabeth H. Maddux Post Office Box 171717 San Antonio, Texas 78217 Attn: Ms. Margie Gormley

Estella Maple Banning, Ca. 92220

Trust U/W of Eleanor W. McAdoo Bank of America National Trust and Savings Association Post Office Drawer EE Santa Barbara, Ca. 83102

J. R. & Catherine McGinley, Lanroy, Inc., Cleroy, Inc. Post Office Box 3405 Tulsa, Oklahoma 74101 Attn: Mr. John Clegg

Arthur J. and Jennie M. Miller Leonard & Echo Belle Miller Humboldt, Iowa 50548

Harry A. Miller, Jr., Harry A.
Miller, Margaret Ann Miller
Carrico, c/o H. A. Miller
600 First National Bank Bldg.
Midland, Texas 79701

Andrew E. and Bessie R. Nelson Mason City, Iowa 50401

Lorene S. and Hugo W. Nemela 823 Kingsley Waterloo, Iowa 50701

W. J. and Muriel J. Parrott Mason City, Iowa 50401 Pennzoil Co.
Post Office Box 2967
Houston, Texas 77252-2967
Attn: Ken Stanaland

Petco Limited
Post Office Box 911
Breckenridge, Texas 76024-0911
Attn: Mrs. Frankie Jenkins

Ethel Armentrout Petersen Banning, Ca. 92220

Frank O. and Ella M. Peterson Callendar, Iowa 50523

Blanche L. Probert, Shirley F. Porter & H. Hewell Probert 6233 - 40th, N.E. Seattle, Washington 98105

Rio Pecos Corporation 110 West Louisiana, Suite 460 Midland, Texas 79701 Attn: Scott E. Wilson

Dorothy Jeanne Van Zant Sanders Suite 508, Sinclair Building 106 West 5th Street Fort Worth, Texas 76102

John Satoka address unknown

Harry and Laura C. Schrader Rudd, Iowa 50471

Gertrude J. Sproule Scullin 500 West Ocean Avenue Long Beach, Ca. 90802

Burt R. and Mae Shifflet 320 Sunset Road Waterloo, Iowa 50701

J.E. & Beulah H. Simmons Trust First National Bank of Lubbock Post Office Box 1241 Lubbock, Texas 79408 Attn: Mr. Steve Exter

Charles E. and Madge L. Snipps Mason City, Iowa 50401

Standard Oil Production Co. 2 Lincoln Centre, Suite 1000 5420 LBJ Freeway Dallas, Texas 75240-6222 Attn: Ms. Diane Tripp

Sun Exploration & Prod. Co. Post Office Box 2880 Dallas, Texas 75221-2880 Attn: Charles Measley

Texaco, Inc.
Post Office Box 3109
Midland, Texas 79702
Attn: Gary Kern

June M. Thieman and Everett W. Kischer Newell, Iowa 50568

J. H. Van Zant, II 1730 Commerce Building 307 West 7th Fort Worth, Texas 76102-5173d

Pat Alston Ward Post Office Box 38 Lincoln, New Mexico 88338

C. E. Werthenbach, Amerett Schmitz, Individually and as Executrix of the Estate of Cora M. Westhenbach 1707 South Massachusetts Ave. Mason City, Iowa 50450

Cynthia McAdoo Wheatland 33 Branch Street Boston, Massachusetts 02108

Mr. E. B. White Post Office Box 2052 Midland, Texas 79702

G. L. and Christena B. Whitman Waterloo, Iowa 50701

Elizabeth H. Woodburn 1194 College Drive San Bernardino, Ca. 92410