CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY
ANNIE-LAURIE COOGAN

JEFFERSON PLACE
SUITE I - 110 NORTH GUADALUPE
POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208

TELEPHONE. (505) 988-4421
TELECOPIER. (505) 983-6043

January 29, 1991

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

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OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISION

Re: In the Matter of the Application of Amerada Hess Corporation for Statutory Unitization of the North Monument Grayburg/San Andres Unit Area, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Amerada Hess Corporation in the above-referenced case. Amerada Hess Corporation respectfully requests that this matter be placed on the docket for the Examiner hearings scheduled on February 21, 1991.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures

cc w/enc.: Mr. J. C. Hefley

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF AMERADA HESS CORPORATION FOR STATUTORY UNITIZATION OF THE

NORTH MONUMENT GRAYBURG/SAN ANDRES UNIT AREA, LEA COUNTY, NEW MEXICO.

CASE NO. 1625

<u>APPLICATION</u>

AMERADA HESS CORPORATION, pursuant to the provisions of the New Mexico Statutory Unitization Act (Sections 70-7-1 through 70-7-21, N.M.S.A. 1978 Comp.) hereby applies to the Oil Conservation Division for an order unitizing the North Monument Grayburg/San Andres Unit, Lea County, New Mexico, and in support of its application states:

- 1. Amerada Hess Corporation is a Delaware corporation authorized to transact business in the State of New Mexico and is engaged in the business of, among other things, producing and selling oil and gas.
- Amerada Hess Corporation seeks an order pursuant to the Statutory 2. Unitization Act providing for unitized management, operation and further development of the proposed North Monument Grayburg/San Andres Unit Area which consists of 13,385 acres, more or less, of Federal, State and Fee lancs located in Lea County, New Mexico, and is more particularly described as follows:

TOWNSHIP 19 SOUTH, RANGE 36 EAST, N.M.P.M.

- Section 13: E/2 SE/4
- Section 23: S/2 SE/4; SE/4 SW/4
- Section 24: E/2; E/2 SW/4; SW/4 SW/4
- Section 25: All
- Section 26: E/2; SW/4; E/2 NW/4
- Section 34: E/2 E/2; SW/4 SE/4
- Sections 35 and 36: All

TOWNSHIP 19 SOUTH, RANGE 37 EAST, N.M.P.M.

- Section 7: SE/4; E/2 SW/4
- Section 8: W/2 SW/4; SW/4 NW/4
- Section 17: W/2 NE/4; SE/4; W/2
- Section 18: E/2; E/2 W/2; W/2 W/2 (Lots 1, 2, 3 & 4)
- Section 19: E/2; E/2 W/2; W/2 W/2 (Lots 1, 2, 3 & 4)
- Section 20: All
- Section 21: W/2 NW/4; SW/4
- Section 28: W/2
- Section 29: All
- Section 30: E/2; E/2 W/2; W/2 W/2 (Lots 1, 2, 3 & 4)
- Section 31: E/2; E/2 W/2; W/2 W/2 (Lots 1, 2, 3 & 4)
- Section 32: All
- Section 33: All
- Section 34: SE/4; S/2 SW/4

TOWNSHIP 20 SOUTH, RANGE 36 EAST, N.M.P.M.

- Section 1: SW/4; S/2 NW/4; N/2 NW/4 (Lots 3 & 4)
- Section 2: S/2; S/2 N/2; N/2 N/2 (Lots 1, 2, 3 & 4)
- Section 3: E/2 SE/4; S/2 NE/4; NE/4 NE/4 (Lot 1)

TOWNSHIP 20 SOUTH, RANGE 37 EAST, N.M.P.M.

- Section 3: SW/4 NE/4; S/2 NW/4; NW/4 SW/4; N/2 N/2 (Lots 1, 2, 3 & 4)
- Section 4: S/2; S/2 N/2; N/2 N/2 (Lots 1, 2, 3 & 4)
- Section 5: NE/4 SE/4; S/2 SE/4; NW/4 SW/4; S/2 N/2; N/2 N/2
 - (Lots 1, 2, 3 & 4)
- Section 6: S/2 N/2; N/2 N/2 (Lots 1, 2, 3 & 4)
- Section 8: NE/4 NE/4
- Section 9: S/2 NE/4; NW/4 NE/4; NW/4

A map of the proposed Unit Area is attached to this application as Exhibit A.

- 3. The vertical limits of the formations to be included within the proposed Unit Area extends from an upper limit described as the top of the Grayburg formation to a lower limit at the base of the San Andres formation; the geologic markers having been previously found to occur at 3,642 feet and 5,050 feet on the electric log for the AHC-Monument Abo Unit No. 1 Well located in Section 2, Township 20 South, Range 36 East, Lea County, New Mexico.
- 4. The portions of the reservoirs involved in this application have been defined by development.
- 5. The type of operations to be conducted in this Unit initially include secondary recovery by means of waterflooding. At a later date, carbon dioxide flooding or other methods of secondary recovery may be conducted in the proposed unit.
- 6. Attached to this application as Exhibit "B" and incorporated herein is a copy of the proposed plan of unitization which Amerada Hess Corporation considers fair, reasonable and equitable.
- 7. Attached to this application as Exhibit "C" and incorporated herein is a copy of the proposed operating plan covering the manner in which the unit will be supervised and managed and costs allocated and paid.
 - 8. Amerada Hess Corporation further states:
 - a. Unitized management, operating and further development of the portion of the Grayburg and San Andres formations, Eunice Monument Pool, which is the subject of this application, is reasonably necessary in order to effectively carry

- on secondary recovery operations and to substantially increase the ultimate recovery of oil from the unitized portion of the pool.
- b. Unitized methods of operation applied to this portion of the Eunice Monument Pool are feasible, will prevent waste and will result with reasonable probability in the increased recovery of substantially more oil from the pool than would otherwise be recovered.
- c. The estimated additional costs, if any, of conducting such operations will not exceed the estimated value of additional oil recovered plus reasonable profit.
- d. Unitization and adoption of unitized methods of operation will benefit the working interest owners and the royalty owners of the oil and gas rights within this portion of the pool.
- e. Amerada Hess Corporation, as operator, has made a good faith effort to secure voluntary unitization within the portion of the Monument Grayburg/San Andres Pool affected by this application.
- f. The participation formula contained in the

unitization agreement allocates the produced and saved unitized hydrocarbons to the separately

owned tracts in the Unit Area on a fair,

reasonable and equitable basis.

9. Statutory unitization of the North Monument Grayburg/San Andres Unit

Area, Eunice Monument Pool, is in the best interest of conservation, the prevention of

waste and the protection of correlative rights.

WHEREFORE, Amerada Hess Corporation respectfully requests that this

application be set for hearing before a duly appointed Examiner of the Oil Conservation

Division on February 21, 1991 and, that after notice and Learing as required by law and

the rules of the Division, the Division enter its order granting this application statutorily

unitizing the North Monument Grayburg/San Andres Unit Area, Lea County, New

Mexico.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM F. CARR

Post Office Box 2208

San a Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR AMERADA HESS

CORPORATION

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LAWYERS

JACK M. CAMPBELL
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POST OFFICE BOX 220B
SANTA FE, NEW MEXICO 87504-2208

TELEPHONE (505) 988-4421
TELECOPIER: (505) 983-6043

Car 10253

January 31, 1991

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Ms Florene Davidson
Staff Specialist
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

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Re: In the Matter of

In the Matter of the Application of Amerada Hess Corporation for Statutory Unitization of the North Monument Grayburg/San Andres Unit Area, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed please find a revised Exhibit A to the above-referenced application which we filed on January 29, 1991. I would appreciate it if you would replace Exhibit A with this exhibit.

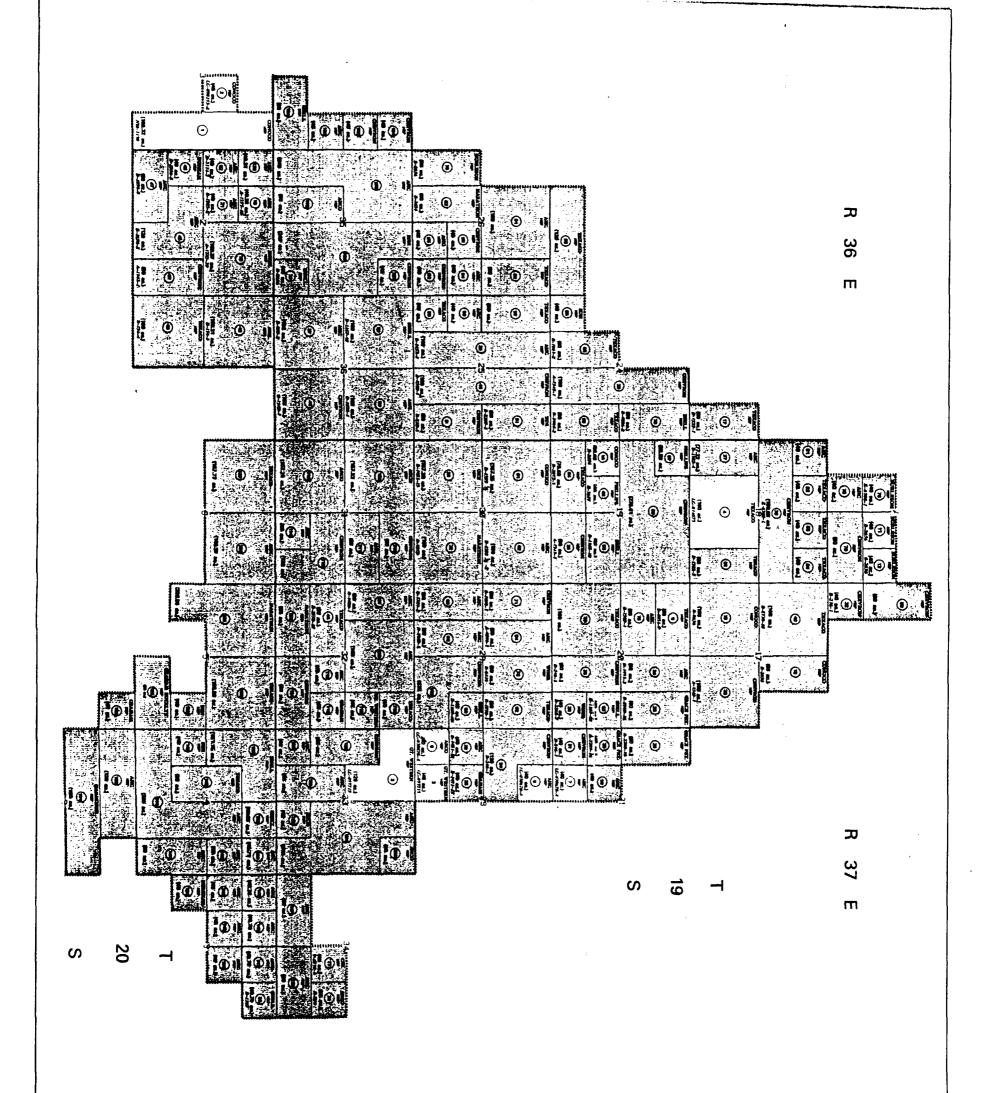
Thank you for your assistance in this matter.

Very truly yours,

WILLIAM F. CARR

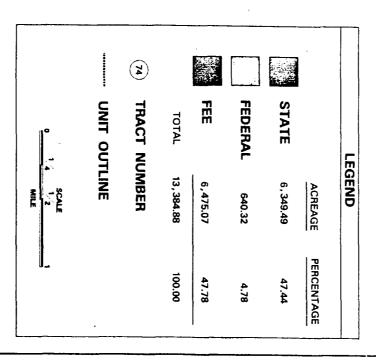
WFC:mlh Enclosure

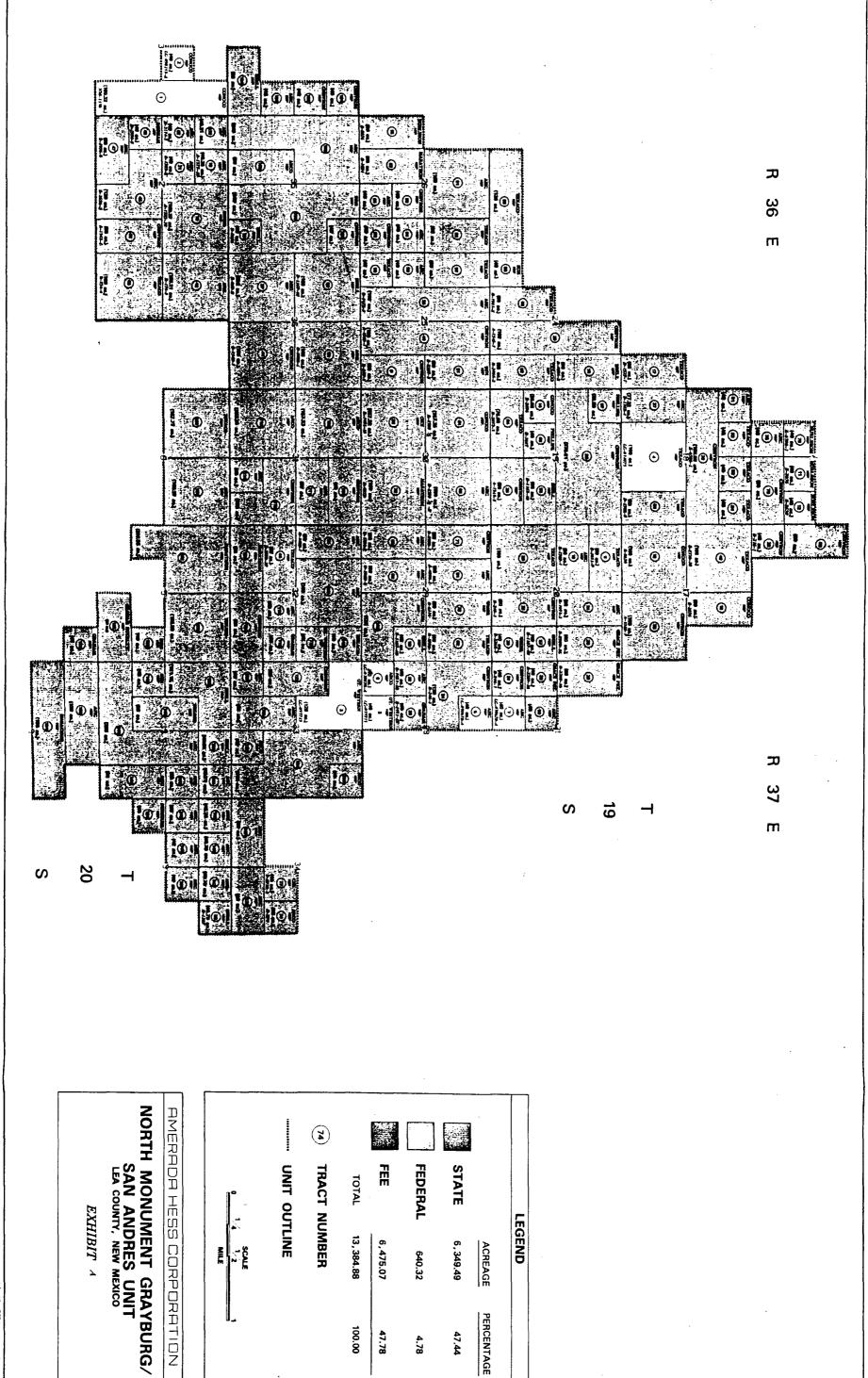
cc w/enc.: Mr. J. C. Hefley



NORTH MONUMENT GRAYBURG/
SAN ANDRES UNIT
LEA COUNTY, NEW MEXICO

EXHIBIT 4





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