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*FORMERLY COMPRISING THE FIRM OF
CULTON, MORGAN, BRITAIN & WHITE, P.C

September 12, 1995



HAND-DELIVERY

Florene Davidson Oil Conservation Division State Land Office Building Santa Fe, NM 87503

Dear Florene:

Enclosed for filing are the following:

- 1. An original and two copies of an Application for Approval of a Unit Agreement, and a proposed advertisement, filed on behalf of Harvey E. Yates Company; and
- 2. An original and two copies of an Application for Special Administrative Downhole Commingling Rules, and a proposed advertisement, filed on behalf of Pogo Producing Company.

Please set both matters for the October 5, 1995 Examiner Hearing. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Enclosure JB/sp

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF HARVEY E.
YATES COMPANY FOR APPROVAL OF
A UNIT AGREEMENT, OTERO COUNTY,
NEW MEXICO

NO. //394

APPLICATION

Harvey E. Yates Company hereby applies for approval of a unit agreement for its proposed Bennett Ranch Federal Unit, and in support thereof states:

1. Applicant requests approval of the Bennett Ranch
Federal Unit Agreement, an exploratory unit comprised of the
following federal and state lands:

Township 26 South, Range 12 East, N.M.P.M.

Section 2: W½, SE¼
Section 3: All
Sections 10-15: All
Sections 22-26: All
Section 27: N½

Section 35: Lots 1, 2, 3, 4, N½N½ Section 36: Lots 1, 2, 3, 4, N½N½

Township 26 South, Range 13 East, N.M.P.M.

Section 18: Lots 1, 2, 3, 4, E%
Section 19: Lots 1, 2, 3, 4, E%
Section 30: Lots 1, 2, 3, 4, E%
Section 31: Lots 1, 2, 3, 4, N%NE%

Comprising 10,517.57 acres, more or less.

- 2. Applicant requests that it be designated operator of the unit.
- 3. Preliminary approval of the unit is being obtained from the Bureau of Land Management and the Commissioner of Public Lands.

4. The granting of this application is in the interests of conservation and the prevention of waste.

WHEREFORE, Applicant requests that the Bennett Ranch Federal Unit Agreement be approved.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Post Office Box 2068

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Attorneys for Applicant

bennett.app

PROPOSED ADVERTISEMENT

Case No. 11394: Application of Harvey E. Yates Company for a Unit Agreement, Otero County, New Mexico. Applicant seeks approval of the Bennett Ranch Federal Unit Agreement for an area comprising 10,517.57 acres, more or less, of Federal and State lands consisting of all or part of Sections 2, 3, 10-15, 22-27, 35, and 36, Township 26 South, Range 12 East, N.M.P.M. and Sections 18, 19, 30, and 31, Township 26 South, Range 13 East, N.M.P.M. Said unit area is centered approximately 32 miles East-Northeast of the intersection of U.S. Highway 54 with the Texas/New Mexico state line.

bennett.ad