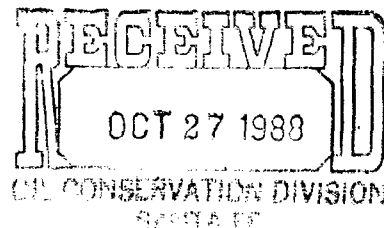


October 18, 1988



Energy and Minerals Department  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

*Case 9519*

Re: Township 16 South, Range 34 East, NMPM  
Section 6: S/2  
Lea County, New Mexico

Gentlemen:

Enclosed for filing, please find three copies of the First Amended Application of M. Brad Bennett, Inc. for an Unorthodox Gas Well Location, Lea County, New Mexico.

We understand that this matter has been set for hearing before an Examiner on November 9, 1988.

Thank you.

Sincerely yours,

DICKERSON, FISK & VANDIVER

  
Chad Dickerson

CD:pvw  
Enclosures

cc w/enclosure: Mr. M. Brad Bennett

BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO

RECEIVED

OCT 27 1959

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION :  
OF M. BRAD BENNETT, INC. FOR AN :  
UNORTHODOX GAS WELL LOCATION, LEA :  
COUNTY, NEW MEXICO :

---

CASE NO. 9519

FIRST AMENDED APPLICATION

COMES NOW M. Brad Bennett, Inc., by its attorneys, and  
in support hereof, respectfully states:

1. Applicant is the operator of the following lands  
in Lea County, New Mexico:

Township 16 South, Range 34 East, N.M.P.M.

Section 6: Lots 17, 18, E/2 SW/4,  
SE/4 (S/2)

containing 303.79 acres, more or less,  
and proposes to drill a well at a point located 660 feet from the  
south line and 660 feet from the east line of said Section 6 to  
an approximate depth of 12,620 feet and to test all formations  
from the surface through the base of the Morrow formation.

2. The Applicant seeks an exception to the well loca-  
tion requirements of Rule 104 of the Oil Conservation Division to  
permit the drilling of the well at the above mentioned unorthodox

location for all formations from the top of the Wolfcamp formation through the base of the Morrow formation which may be developed on 320-acre spacing.

3. A standard proration unit comprising the S/2 of said Section 6 should be dedicated to such well or to such lesser portion thereof as is reasonably shown to be productive of oil and gas.

4. The approval of this Application will afford Applicant the opportunity to produce its just and equitable share of oil and gas, will prevent economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells, and will otherwise prevent waste and protect correlative rights.

WHEREFORE, Applicant prays:

A. That this Application be set for hearing before an examiner and that notice of said hearing be given as required by law.

B. That upon hearing the Division enter its order granting Applicant permission to drill a well at a point 660 feet from the south line and 660 feet from the east line of said Section 6, and to dedicate the S/2 of Section 6 to said well for production from all formations which may be developed on 320-acre spacing.

C. And for such other and further relief as may be just in the premises.

M. BRAD BENNETT, INC.

By:   
Chad Dickerson

DICKERSON, FISK & VANDIVER  
Seventh and Mahone, Suite E  
Artesia, New Mexico 88210  
(505) 746-9841

Attorneys for Applicant

October 17, 1988

*Case 9519*

Energy and Minerals Department  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Re: Township 16 South, Range 34 East, NMPM  
Section 6: S/2  
Lea County, New Mexico

Gentlemen:

Enclosed for filing, please find three copies of the Application of M. Brad Bennett, Inc. for an Unorthodox Gas Well Location, Lea County, New Mexico. Also enclosed is an extra copy of the Application which we would appreciate your returning to us in the enclosed stamped self-addressed envelope after inserting the docket number.

Please set this matter for hearing before an Examiner on November 9, 1988.

Thank you.

Sincerely yours,

DICKERSON, FISK & VANDIVER



Chad Dickerson

CD:pvw  
Enclosures

cc w/enclosure: Mr. M. Brad Bennett

BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION :  
OF M. BRAD BENNETT, INC. FOR AN :  
UNORTHODOX GAS WELL LOCATION, LEA :  
COUNTY, NEW MEXICO :

---

CASE NO. 9519

APPLICATION

COMES NOW M. Brad Bennett, Inc., by its attorneys, and  
in support hereof, respectfully states:

1. Applicant is the operator of the following lands  
in Lea County, New Mexico:

Township 16 South, Range 34 East, N.M.P.M.

Section 6: S/2

containing 320 acres, more or less,  
and proposes to drill a well at a point located 660 feet from the  
south line and 660 feet from the east line of said Section 6 to  
an approximate depth of 12,620 feet and to test all formations  
from the surface through the base of the Morrow formation.

2. The Applicant seeks an exception to the well loca-  
tion requirements of Rule 104 of the Oil Conservation Division to  
permit the drilling of the well at the above mentioned unorthodox

location for all formations from the top of the Wolfcamp formation through the base of the Morrow formation which may be developed on 320-acre spacing.

3. A standard 320-acre proration unit comprising the S/2 of said Section 6 should be dedicated to such well or to such lesser portion thereof as is reasonably shown to be productive of oil and gas.

4. The approval of this Application will afford Applicant the opportunity to produce its just and equitable share of oil and gas, will prevent economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells, and will otherwise prevent waste and protect correlative rights.

WHEREFORE, Applicant prays:

A. That this Application be set for hearing before an examiner and that notice of said hearing be given as required by law.

B. That upon hearing the Division enter its order granting Applicant permission to drill a well at a point 660 feet from the south line and 660 feet from the east line of said Section 6, and to dedicate the S/2 of Section 6 to said well for production from all formations which may be developed on 320-acre spacing.

C. And for such other and further relief as may be just in the premises.

M. BRAD BENNETT, INC.

By:   
Chad Dickerson

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Seventh and Mahone, Suite E  
Artesia, New Mexico 88210  
(505) 746-9841

Attorneys for Applicant