KELLAHIN and KELLAHIN
ATTORNEYS A'T LAW
BOO DON GABPARAYENUE
P. O. BOX 1759
SANTA FE, NEW MEXICO 87501

January 9, 1979

Mr. Joe Ramey
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: HNG Oil Company

建筑的大型的大型的工作的设施。

Dear Joe:

W, THOMAS KELLAHIN

I would appreciate you setting the enclosed application for hearing on January 31, 1979.

Very truly yours

W. Thomas Kellahi

WTK/ma

Enclosure:

CC: Mr. Raymond Parker

And per appear

TELEPHONE 982-4238

JULY - 0 1979

BEFORE THE

ENERGY AND MINERAL DEPARTMENT STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION-OF HNG OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

The Bridge of the State of the confidence of the

Case 6431

APPLICATION

Comes now HNG Oil Company and applies to the Oil

Conservation Division of New Mexico for an order pooling
all oil and gas mineral interests, whatever they may be, in
the N/2 of Section 25, Township 23 South, Range 28 East,
N.M.P.M., Eddy County, New Mexico, in the Pennsylvanian
formation including but not limited to Morrow, Strawn and
Atoka, underlying said tract, and in support thereof would
show the Commission:

- 1. Applicant proposes to drill a well to the Pennsylvanian formation at an orthodox location 2310 feet from West line and 660 feet from the North line, dedicating the above-described 320 acre tract to the well.
- 2. Applicant has obtained leases, or participation in the drilling of the well from all interest owners in said 320 acre unit with the exception of the following persons, whose interest, names and addresses, to the best of applicant's information and belief, are as follows:

1.875 acre tract, designated as Farm Tract 664, located in the N/2 SW/4 SW/4 NW/4 of Section 23 Owned by Heirs of Albert Larson, and by Olaf Enderud. Last known address, Caldwell, Kansas, no other address found

5 acre tract known as Farm Tract 660, located in the N/2 SW/4 NW/4 NW/4 of Section 23

Owned by <u>Heirs of Burt Schurr</u>, last know address Leroy, Kansas

Heirs of Albert Larson and Olaf Enderud believed to be represented by Don B. Stallings, Attorney, Stock Exchange Building, 103 South Main Street, Caldwell, Kansas 67022

3. Applicant has made diligent effort to obtain the participation of said nonconsenting parties in the drilling of the proposed well, or, in the alternative, obtain a lease or farmout from them, but has been unable to do so.

WHEREFORE applicant prays the Division compulsory pool all of the mineral interests to the Pennsylvanian formation underlying the above tract, designating applicant as operator, and making provision in such order for applicant to recover out of production its costs of drilling, completing and equipping the proposed well, with costs of supervision while drilling, together with provisions for recovery of the costs of operation, including costs of supervision, upon completion of the well, and for a risk factor of 200% for the risk assumed in drilling the well, and for such other and further relief as proper.

Respectfully submitted,

HNG Oil Company

Kellahin & Keylahir

P. O. Box 1769 Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT