



October 31, 2005

**VIA HAND DELIVERY**

Mark E. Fesmire, P.E.  
Director - Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

*Case 13599*

2005 NOV 1 PM 5 03

**Re: Application of Parallel Petroleum Corporation for Compulsory Pooling,  
Chaves County, New Mexico.**

Dear Mr. Fesmire:

Enclosed in triplicate is an application for Parallel Petroleum Corporation, as well as copies of the docket advertisement. Parallel requests that these matters be placed on the docket for the December 1, 2005 Examiner hearings.

Sincerely,

*Ocean Munds-Dry*  
Ocean Munds-Dry

OMD

Enclosures

cc: Michael Gray  
Parallel Petroleum Corp.

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION  
OF PARALLEL PETROLEUM CORPORATION, FOR  
COMPULSORY POOLING,  
CHAVES COUNTY, NEW MEXICO.**

CASE NO. 13599

2005 NOV 1  
PM 5 03

**APPLICATION**

Parallel Petroleum Corporation ("Parallel"), through its undersigned attorneys, hereby makes application for an order pooling all uncommitted mineral interests in all formations from the surface to the base of the Wolfcamp formation underlying the W/2 of Section 33, Township 14 South, Range 26 East, NMPM, Chaves County, New Mexico, to form a standard 320-acre gas spacing and proration unit for all formations spaced on 320 acres within this vertical extent; and the SW/4 to form a standard 160-acre gas spacing and proration unit for all formations spaced on 160 acres within this vertical extent.

In support of its application Parallel states:

1. Parallel is a working interest owner in the W/2 of Section 33 and has the right to drill thereon.
2. Parallel proposes to dedicate the W/2 of Section 33 to its proposed Affirmed Well No.1, to be drilled as a horizontal test well from a surface location 400 feet from the South line and 1880 feet from the West line, penetrating the Wolfcamp objective 700 feet from the South line and 1880 feet from the West line and terminating

in the Wolfcamp formation 660 feet from the North line and 1880 feet from the West line.

3. Parallel has attempted but has been unable to reach agreement with certain interest owners in the W/2 of Section 33 identified on Exhibit A to this application.

4. Approval of this application will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit Parallel the opportunity to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted mineral interests should be pooled, and Parallel should be designated operator of the proposed well.

WHEREFORE, Parallel requests that this application be set for hearing before an Examiner of the Oil Conservation Division on December 1, 2005, and that after notice and hearing as required by law the Division enter its order:

- A. pooling all uncommitted mineral interests in the subject spacing and proration unit;
- B. designating Parallel as operator of the unit and the proposed well;
- C. authorizing Parallel to recover its costs of drilling, equipping and completing this well;
- D. approving the actual operating charges and costs of supervision while drilling and after completion of this well, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- E. imposing the 200% risk penalty provided by Division Rule 19.15.1.35 against any working interest owner who does not voluntarily participate in this project.

Respectfully submitted,

HOLLAND & HART, LLP

By: Ocean Munds-Dry

William F. Carr  
Ocean Munds-Dry  
P.O. Box 2208  
Santa Fe, NM 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR PARALLEL  
PETROLEUM CORP.

**EXHIBIT A**

**IN THE MATTER OF THE APPLICATION  
OF PARALLEL PETROLEUM CORP. FOR COMPULSORY  
POOLING, CHAVES COUNTY, NEW MEXICO.  
(Affirmed Well No. 1)**

Devon Energy Production Company, L.P.  
20 North Broadway  
Suite 1500  
Oklahoma City, OK 73102-8260

**CASE 13599: In The Matter Of The Application Of Parallel Petroleum Corporation For Compulsory Pooling, Chaves County, New Mexico.** Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in the W/2 of Section 33, Township 14 South, Range 26 East, NMPM, Chaves County, New Mexico, in order to form a standard 320-acre gas spacing and proration unit for all formations or pools spaced on 320 acres within this vertical extent; and the SW/4 to form a standard 160-acre gas spacing and proration unit for all formations or pools spaced on 160 acres within this vertical extent. This spacing and proration unit is to be dedicated to the Affirmed Well No. 1 to be drilled as a horizontal test well from a surface location 400 feet from the South line and 1880 feet from the West line, penetrating the Wolfcamp objective 700 feet from the South line and 1880 feet from the West line and terminating in the Wolfcamp formation 660 feet from the North line and 1880 feet from the West line. Also to be considered will the cost of drilling and completion of said well and the allocation of the cost thereof, the actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 4 miles south of Hagerman, New Mexico.



October 31, 2005

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

TO: AFFECTED INTEREST OWNERS

Re: Application of Parallel Petroleum Corporation for compulsory pooling, Chaves County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Parallel Petroleum Corporation has filed the enclosed application with the New Mexico Oil Conservation Division seeking an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in certain spacing and proration units in the W/2 of Section 33, Township 14 South, Range 26 East, N.M.P.M., Chaves County, New Mexico. Said pooled units are to be dedicated to Parallel's Affirmed Well No. 1 to be drilled as a horizontal test well from a surface location 400 feet from the South line and 1880 feet from the West line, penetrating the Wolfcamp objective 700 feet from the South line and 1880 feet from the West line and terminating in the Wolfcamp formation 660 feet from the North line and 1880 feet from the West line. The well will be at a standard location in all formations.

This application has been set for hearing before a Division Examiner on December 1, 2005. The hearing will be held in Porter Hall in the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Pre-hearing Statement at least four business days in advance of a scheduled hearing, but in no event later than 5:00 pm MST, on the Thursday preceding the scheduled hearing date. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Very truly yours,

Ocean Munds-Dry  
ATTORNEY FOR PARALLEL PETROLEUM  
CORP.