

**JAMES BRUCE**

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August 22, 2003

Hand Delivered

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**RECEIVED**

AUG 22 2003

Oil Conservation Division

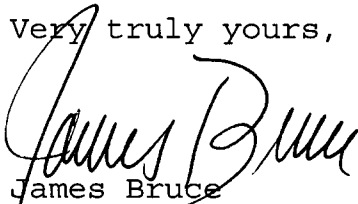
*Case 13148*

Dear Florene:

Enclosed are an original and one copy of an application for compulsory pooling, together with a proposed advertisement, filed on behalf of Roca Operating, Inc. Please set this matter for the September 18, 2003 Examiner hearing. Thank you.

The advertisement is also on the enclosed disk.

Very truly yours,

  
James Bruce

Attorney for Roca Operating, Inc.

PARTIES BEING POOLED

Hamon Oil Company  
3900 Republicbank Tower  
325 North St. Paul  
Dallas, Texas 75201

Hilliard Oil & Gas, Inc.  
-no address-

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AUG 22 2003

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

Oil Conservation Division

APPLICATION OF ROCA OPERATING,  
INC. FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

Case No.

13148

APPLICATION

Roca Operating, Inc. applies for an order pooling all mineral interests from the top of the Wolfcamp formation to the base of the Morrow formation underlying the N½ of Section 36, Township 18 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is operator the NM 36 State Com. Well No. 1, located in the NW¼NE¼ of Section 36, and has completed the well in the Morrow formation. Applicant seeks to dedicate the N½ of Section 36 to the well to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, including the North Quail Ridge-Morrow Gas Pool.

2. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the N½ of Section 36 for the purposes set forth herein.

3. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the N½ of Section 36, pursuant to NMSA 1978 §70-2-17.

4. The pooling of all mineral interests underlying the N½ of Section 36, as set forth above, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

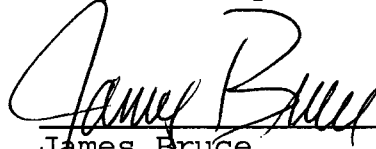
**WHEREFORE**, Applicant requests that, after notice and hearing, the Division enter its order:

A. Pooling all mineral interests in the N½ of Section 36 from the top of the Wolfcamp formation to the base of the Morrow formation; and

B. Designating applicant as operator of the well.

**THE PARTIES BEING POOLED UNDER THIS APPLICATION OWN RECORD TITLE INTERESTS ONLY, SO APPLICANT REQUESTS THAT, IN THE ABSENCE OF OBJECTION, THIS MATTER BE TAKEN UNDER ADVISEMENT.**

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Roca Operating, Inc.