

  
**MILLER STRATVERT**  
PROFESSIONAL ASSOCIATION

Ranne B. Miller  
Alice T. Lorenz  
Stephen M. Williams  
Stephan M. Vidmar  
Seth V. Bingham  
Timothy R. Briggs  
Rudolph Lucero  
Deborah A. Solove  
Gary L. Gordon  
Lawrence R. White  
Sharon P. Gross  
Virginia Anderman  
Marte D. Lightstone

J. Scott Hall\*  
Thomas R. Mack  
Thomas M. Domne  
Ruth O. Pregenzer  
Jeffrey E. Jones  
James J. Widland  
Bradley D. Tepper\*\*  
Robin A. Goble  
James R. Wood  
Dana M. Kyle  
Kirk R. Allen  
Ruth Fuess  
H. Brook Laskey

Paula G. Maynes  
Michael C. Ross  
Carla Prando  
Jennifer L. Stone  
Gary Risley  
M. Dylan O'Reilly  
Jennifer D. Hall  
Jennifer L. Olson  
Todd A. Schwarz  
Nell Graham Sale  
Scott P. Hatcher  
Leonard D. Sanchez  
Michelle K. Ostrye

Kelsey D. Green  
Marcy Baysinger  
David J. Martin  
Caroline Blankenship  
Matthew S. Rappaport  
Karen E. Wootton  
Somar K. Chyz

Counsel

William K. Stratvert  
James B. Collins  
Robert D. Taichert

Reply to Santa Fe

150 Washington Ave., Suite 300  
Santa Fe, NM 87501

Mailing Address:  
P.O. Box 1986  
Santa Fe, NM 87504-1986

Telephone: (505) 989-9614  
Facsimile: (505) 989-9857

\* New Mexico Board of Specialization Recognized Specialist in Natural Resources - Oil & Gas Law

\*\* New Mexico Board of Specialization Recognized Specialist in Real Estate Law

February 9, 2004

**RECEIVED**

FEB 9 2004

**HAND-DELIVERED**

Ms. Lori Wrotenbery, Director  
New Mexico Oil Conservation Commission  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Re: NMOCD Case No. 13085; *Application of EGL Resources, Inc. and Robert Landreth for Pool Extension for the North Bell Lake-Devonian Gas Pool, Or Alternatively, for Pool Creation and Special Pool Rules, And Expansion of Gas Spacing and Proration Unit, Lea County, New Mexico*

Dear Ms. Wrotenbery:

The examiner hearing on the Application referenced above was concluded on October 2, 2003. Correspondingly, on behalf of the Applicants, we respectfully request the entry of a final order in the case at the Division's earliest convenience. While the Division is understandably preoccupied with the current legislative session, the Applicants are concerned that any further delay will result in the loss of valuable property rights. In addition, an offsetting well drilled by Devon Energy Production Company that was the subject of an interim order has reached total depth (14,601') and will be completed at a location the Applicants have asserted will be deemed to be unorthodox, resulting in the violation of correlative rights. (See attached copy of the August 22, 2003 *Decision Of The Examiner.*)

For these reasons, we would appreciate your consideration of this request as soon as your schedule may permit.

LAW OFFICES

ALBUQUERQUE  
(505) 842-1950

FARMINGTON  
(505) 326-4521

LAS CRUCES  
(505) 523-2481

SANTA FE  
(505) 989-9614

Ms. Lori Wrotenbery  
February 9, 2004  
Page 2

Thank you for your cooperation in this matter.

Very truly yours,

MILLER STRATVERT P.A.

A handwritten signature in black ink, appearing to read "J. Scott Hall". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke extending to the right.

J. Scott Hall

JSH/glb  
Enclosure

cc: Gail MacQuestan, Counsel for the Division  
W. Thomas Kellahin, Counsel for Devon Energy Production Company, L.P. (via fax)  
James Bruce, Counsel for Southwestern Energy Production Company (via fax)  
Mr. Wes Perry, EGL Resources  
Mr. Robert Landreth