



September 11, 1995

303-733-5200
303-733-5200
Southern
Rockies
Business
Unit

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
2040 S. Pacheco Street
P.O. Box 6429
Santa Fe, NM 87505

Case 11419

**Application For Compulsory Pooling
Fruitland Sand and Pictured Cliffs Formations
SW/4 Section 13-T27N-R13W
2310'FSL & 1850'FWL
Wildcat;27N13W13K-Fruitland Sand Pictured Cliffs Pool
San Juan County, New Mexico**

Amoco Production Company hereby makes application for compulsory pooling all mineral interests in the Fruitland Sand and the Pictured Cliffs Formations underlying the SW/4 of Section 13, T27N-R13W thereby forming a standard 160 acre gas spacing and proration unit for the Wildcat;27N13W13K-Fruitland Sand Pictured Cliffs Pool to be dedicated to the Ginther Gas Com #2 Well. Amoco is the operator of this well and plans to recomple the well from the Dakota formation to the Fruitland Sand and Pictured Cliffs formations.

In support of this application, Amoco states that it is the majority owner of working interest (52%) in both the Fruitland Sand and the Pictured Cliffs formations in the SW/4 of Section 13 T27N-R13W. Amoco has been unsuccessful in several attempts to get a written response from two of the working interest parties and we feel it is necessary to go forward with an action to force pool these parties. The hearing should consider the cost of recompleting said well and the allocation of such costs, the actual operating costs and charges for supervision, and a charge for risk involved in the recompletion of the well.

A copy of this application will be submitted to the owners of uncommitted leasehold interests by certified mail. Amoco respectfully requests that this application be set for hearing on the next available examiner hearing docket.

P.W. Staley

Attachment
cc: Julie Jenkins
Mark Yamasaki

UNCOMMITTED WORKING INTEREST OWNERS

John R. Royall
2600 Republic Bank Tower
Dallas, Texas 75201-3803

H.S. Bennett
P.O. Box 1401
Dallas, Texas 75221-1401

Ginther Gas Com #2
Forced Pooling Application

Location: 2310' FSL x 1850' FWL Section 13-T27N-R13W

BLM Lease Number SF-078099

Fruitland Sand
Pictured Cliffs

Spacing: SW/4 of Section 13

Working Interest Owners:

Amoco Production Company 52.083335%
P. O. Box 800
Denver, CO 80201

Dugan Production Corp. 37.500000%
P. O. Box 420
Farmington, NM 87499-0420

John R. Royall 4.166665%
2600 Republic Bank Tower
Dallas, TX 75201-3803

H. S. Bennett 6.250000%
P. O. Box 1401
Dallas, TX 75221-1401

Royalty Interest Owner:

Minerals Management Service 12.500000%
Royalty Management Program
P. O. Box 5810 TA
Denver, CO 80217-5810

Overriding Royalty Interest Owners:

Perry E. Pound 0.625000%
P. o. box 77156
Steamboat Springs, CO 80477-1156

Edmond Lee Ginther, Trustee 0.010000%
1517 San Jacinto
Houston, TX 77002-7623

Albert R. Greer 0.037500%
c/o Benson-Montin-Greer Drlg. Corp.
501 Airport Drive, Suite 221
Farmington, NM 87401