

*Dena B. Allen Trust
148 North Brooksblve
Ventura, CA 93003
(805) 658-1140*

George R. Thompson
Business Manager

September 16, 1996

Rand Carroll, Attorney at Law
New Mexico Department of Energy
Oil Conservation Division

11616

Fax # (505) 827-8177

Mr. Carroll:

I represent Irene A. Maertens and her sister, Dena B. Maertens who both live in Ventura, Calif. My clients own a certain 40 acre piece of property and a 75% interest to the oil and mineral rights, therein, in Lea County, New Mexico according to a deed and Assignment of Oil and Gas Lease No. A-3344 dated December 19, 1932.

In a certified letter to Irene A. Maertens dated September 5th, 1996, William F. Carr, attorney for the Manzano Oil Company, has advised us of a hearing (Case # 11616) pending before a division examiner of the New Mexico Oil Conservation Division which appears to be an application for compulsory pooling of certain lands in the Lea County area, which includes my clients 40 acre parcel.

I have called Mr Carr no less than six (6) times since receiving this letter and have had no response from him or any member of his law firm. Frankly, I am concerned that no one representing the Manzano Oil Company contacted either of my clients prior to this certified letter to discuss their plans for my clients property or to explain to my clients any of the numerous options available to them in order for an informed decision to be made regarding their interests in the matter of this hearing and the so-called compulsory pooling. Had my clients been so contacted, it is entirely likely that a voluntary agreement could have been reached with Manzano and the outcome of this hearing would have no impact on my clients position.

Because the Maertens' were not properly contacted regarding this matter and I don't have the time to obtain and file the required forms according to memorandum 2-90, We would like to request that this matter be continued until we can meet with Manzano Oil to determine how best to proceed in my clients behalf.

I will be attending this hearing on the 26th to make certain that my clients have some representation in this matter.

Sincerely,


George R. Thompson

GRT/hp

enclosure

148 North Brookshire Avenue
(805) 658-1140 - Voice
(805) 658-8383 - Fax

Dena B. Allen Trust

Fax

To: Rand Carroll	From: George R. Thompson
Fax: (505) 827-8177	Pages: One (1) + Cover
Phone: (505) 827-7133	Date: September 18, 1996
Re: Case # 11616	CC: William Carr

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

• **Comments:** Mr. Carroll

I represent Irene and Dena Maertens (Allen), who hold an Oil Lease which Manzano Oil wants to involve in a compulsory pooling action before your director on Sept. 26th. I am concerned that Paragraph 4 of the application has not been carried out with respect to my clients and I have formally outlined my complains in the following letter.

If you have any questions, I can be reached at (805) 658-1140, 10-3 PST.

Sincerely,

George R. Thompson

148 North Brookshire Avenue
(805) 658-1140 - Voice
(805) 658-8383 - Fax

Donna B. Allen Trust

Fax

To: Rand Carroll **From:** George R. Thompson

Fax: (505) 827-8177 **Pages:** One (1) + Cover

Phone: (505) 827-7133 **Date:** September 18, 1996

Re: Case # 11616 **CC:**

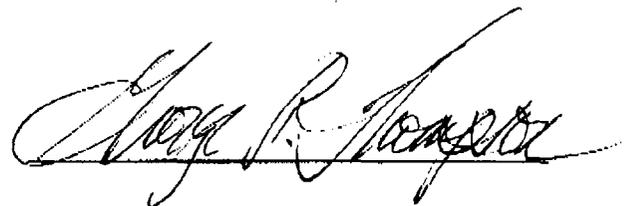
Urgent For Review Please Comment Please Reply Please Recycle

• **Comments:** Mr. Carroll:

Enclosed is the cover page from Cambell, Carr, et al, which was enclosed with a copy of the Manzano application under certified mail to my clients. I had meant to send this with my original letter but overlooked it.

Sincerely,

George R. Thompson



**CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS**

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
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September 5, 1996

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

TO ALL AFFECTED INTEREST OWNERS

Re: Application of Manzano Oil Corporation for Compulsory Pooling and an Unorthodox Well Location, Lea County, New Mexico

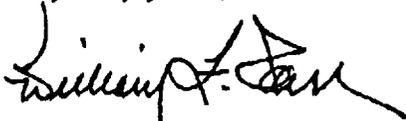
Gentlemen:

This letter is to advise you that Manzano Oil Corporation has filed the enclosed application with the New Mexico Oil Conservation Division. You are the owner of an interest that may be affected by this application.

This matter has been set for hearing before a Division Examiner on September 26, 1996. You are not required to attend this hearing but you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging this matter at a later date.

Parties appearing in cases have been requested by the Division (Memorandum 2-90) to file a Pre-Hearing Statement substantially in the form prescribed by the Division. Pre-Hearing Statements should be filed by 4:00 p.m. on the Friday before a scheduled hearing.

Very truly yours,



WILLIAM F. CARR
Attorney for Manzano Oil Corporation
WFC:mlh
cc: Ken Barbe