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February 28, 1997

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87504

11758

Re: Application of Bass Enterprises Production
Company to Drill and for Simultaneous Dedi-
cation, Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed herewith please find Bass' Application as captioned
above for filing, and docketing.

Thank you for your assistance.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

James E. Haas
James E. Haas

JEH:kth
Encl.

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

IN THE MATTER OF THE APPLICATION OF :
BASS ENTERPRISES PRODUCTION CO. TO DRILL :
AND FOR SIMULTANEOUS DEDICATION OR, IN THE :
ALTERNATIVE, SIMULTANEOUS DEDICATION AND :
FOR UNORTHODOX GAS WELL LOCATION, :
EDDY COUNTY, NEW MEXICO :

Case No. 11758

**APPLICATION TO DRILL AND FOR
SIMULTANEOUS DEDICATION OR IN THE ALTERNATIVE,
FOR SIMULTANEOUS DEDICATION AND
UNORTHODOX GAS WELL LOCATION**

COMES NOW BASS ENTERPRISES PRODUCTION COMPANY, by its attorneys,
Losee, Carson, Haas & Carroll, P. A. (James E. Haas and Ernest L. Carroll), and in support
hereof, respectfully states:

1. Applicant drilled its Turkey Track "2" State No. 1 Well (API #30-015-28481) at an orthodox location 2,180' FNL and 660' FEL of Section 2, Township 19 South, Range 28 East, N.M.P.M.;
2. Applicant seeks to drill its Turkey Track "2" State No. 2 Well at an orthodox location because of geologic conditions which prevent the production of all the reserves underlying the E/2 of Section 2 by the Turkey Track "2" State No. 1 Well.
3. In order to prevent waste and protect correlative rights, it is necessary to drill another well and dedicate it to the existing 320-acre unit;
4. IN THE ALTERNATIVE, if the Division's Order NSL-3745 approving Mewbourne's Scanlon Draw "35" State No. 1 Well at an unorthodox location 660 feet FSL and 1980 feet FWL of Section 35, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, is upheld by order in pending Case No. 11713, Applicant seeks the corresponding

unorthodox location for its Turkey Track "2" No. 2 Well in the E/2 of Section 2, Township 19 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and the simultaneous dedication of said well to the E/2 of Section 2 proration unit.

5. The drilling of this well at this location is necessary to prevent waste and protect correlative rights.

WHEREFORE, Applicants pray as follows:

A. that this application be set for hearing before an Examiner and that notice of said hearing be given as required by law;

B. that the Division enter its order providing for the drilling of Bass' Turkey Track "2" State No. 2 Well at an orthodox location in Section 2, Township 19 South, Range 28 East, N.M.P.M., and the simultaneous dedication of said well to the unit; or, **IN THE ALTERNATIVE,**

C. that the Division, in the event Order NSL-3745 approving Mewbourne's Scanlon Draw "35" State No. 1 Well at an unorthodox location 660 feet FSL and 1980 feet FWL of Section 35, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, is upheld by order pending in Case No. 11713, enter an order providing for the drilling by Bass of a well at a corresponding unorthodox location in the E/2 of Section 2, and simultaneous dedication of said well to the proration unit consisting of the E/2 of Section 2.

D. and for such other relief as may be just in the premises.

Respectfully submitted,

LOSEE, CARSON, HAAS & CARROLL, P.A.

By:  _____

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Attorneys for Applicants Bass Enterprises Production
Company