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July 18, 2000

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Hand Delivered

Florene Davidson
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing are an original and one copy of an application for an compulsory pooling, together with a proposed advertisement. The documents are also on the enclosed disk. Please set this matter for the August 10, 2000 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Gothic Production Corporation

Parties to be Pooled

Heirs or devisees of Jane C. Byers
Address unknown

Nadel and Gussman Permian, L.L.C.
Suite 508
601 North Marienfeld
Midland, Texas 79701

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF GOTHIC PRODUCTION CORPORATION FOR COMPULSORY POOLING, CHAVES COUNTY, NEW MEXICO.

No. 1346

APPLICATION

Gothic Production Corporation applies for an order pooling all mineral interests from the surface to the base of the Abo formation underlying the SE $\frac{1}{4}$ of Section 28, Township 5 South, Range 25 East, N.M.P.M., Chaves County, New Mexico, and in support thereof, states:

1. Applicant is a working interest owner in the SE $\frac{1}{4}$ of Section 28, and has the right to drill a well thereon.

2. Applicant proposes to drill its McClellan MOC Fed. Com. Well No. 22, at an orthodox location in the SE $\frac{1}{4}$ of Section 28, to a depth sufficient to test the Abo formation, and seeks to dedicate the SE $\frac{1}{4}$ of Section 28 to the well for all pools or formations developed on 160 acre spacing, including the Pecos Slope-Abo Gas Pool.

3. Applicant has in good faith sought the voluntary joinder of all other mineral interest owners in the SE $\frac{1}{4}$ of Section 28 for the purposes set forth herein.

4. 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 acreage. Therefore, Applicant seeks an order pooling all mineral interest owners in the SE $\frac{1}{4}$ of Section 28,

CO. JUL 10 1970
NEW MEXICO
OIL CONSERVATION DIVISION

PROPOSED ADVERTISEMENT

Case 12466 : Application of Gothic Production Corporation for compulsory pooling, Chaves County, New Mexico. Applicant seeks an order pooling all mineral interests from the surface to the base of the Abo formation underlying the SE¼ of Section 28, Township 5 South, Range 25 East, NMPM, to form a standard 160-acre gas spacing and proration unit for any formations and/or pools developed on 160-acre spacing within that vertical extent, including the Pecos Slope-Abo Gas Pool. The unit is to be dedicated to the McClellan MOC Fed. Com. Well No. 22, to be drilled at an unorthodox gas well location in Section 28. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a charge for the risk involved in drilling and completing the well. The unit is located approximately ___ miles _____ of _____ New Mexico.

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COUNTY CLERK