

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

02 FEB 25 PM 1:13

APPLICATION OF TMBR/SHARP DRILLING
INC. FOR COMPULSORY POOLING, LEA
COUNTY, NEW MEXICO.

No. 1281⁶

OCEAN ENERGY, INC.'S MOTION FOR A CONTINUANCE

TMBR/Sharp Drilling Inc. ("TMBR/Sharp") has applied for an order pooling all mineral interests in the N $\frac{1}{2}$ of Section 25, Township 16 South, Range 35 East, N.M.P.M., Lea County, New Mexico. The application is set for hearing on February 21, 2002.

Ocean Energy, Inc. ("Ocean") owns the working interest (via farmout agreement) in the SW $\frac{1}{4}$ of Section 25, and has proposed a well with a well unit comprised of the W $\frac{1}{2}$ of Section 25. Ocean's pooling application will be filed for the March 21, 2002 Examiner hearing.

Ocean requests that TMBR/Sharp's case be continued to the March 21st hearing, for the following reasons:

1. It will be more economic to hear both applications at the same time; and
2. The published notice of TMBR/Sharp's application is erroneous: The notice states that depths from the surface to the base of the Morrow formation are being pooled, while in actuality TMBR/Sharp's well is proposed to test the Mississippian formation. Thus, the matter must be re-advertised for the March 21st hearing.

Ocean has asked TMBR/Sharp to voluntarily continue its case to March 21st, but TMBR/Sharp has not yet voluntarily consented to a continuance.

WHEREFORE, Ocean requests that TMBR/Sharp's case be continued to the March 21, 2002 Examiner hearing, and consolidated for hearing with the application to be filed by Ocean.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Ocean Energy, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record via facsimile transmission this 20th day of February, 2002:

W. Thomas Kellahin
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504
Fax No. (505) 982-2047



James Bruce

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

TELEPHONE (505) 962-4285
TELEFAX (505) 962-2047

JASON KELLAHIN (RETIRED 1991)

February 20, 2002

VIA FACSIMILE

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

Re: REQUEST FOR CONTINUANCE

NMOCD Case No. 12816

Blue Fin "25" Well No. 1 (N/2 25-16S-35E)

Application of TMBR/Sharp Drilling Inc.

for compulsory pooling,

Lea County, New Mexico.

Dear Ms. Wrotenbery:

On behalf of the applicant, please continue the referenced case which appears for hearing on the February 21, 2002 Examiner's docket to the Examiner's docket scheduled for March 21, 2002.

Please correct the advertisement to pooling to the base of the Mississippi instant of the Morrow.

Very truly yours,



W. Thomas Kellahin

cfx: Tmbr/Sharp Drilling Inc.
Attn: Rich Montgomery
James Bruce, Esq.
Ocean Energy Recourse, Inc.