

STATE OF NEW MEXICO

OIL CONSERVATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF E. B. CLARK AND C. B. CHRISTIE
D/B/A CLARK AND CHRISTIE

NO. 235

APPLICATION FOR DESIGNATION OF MONUMENT GAS POOL,
AND FOR OTHER RELIEF

Come now the petitioners, E. B. Clark and C. B. Christie, d/b/a Clark and Christie of Wichita Falls, Texas and by their attorneys, A. L. Zinn, Esq., and Dean S. Zinn, Esq., of Santa Fe, New Mexico respectfully petition the New Mexico Oil Conservation Commission pursuant to Rules 1203 of the Rules and Regulations of the Commission, for specific action and relief, as hereinafter prayed for and as grounds therefor state to the said New Mexico Oil Conservation Commission as follows, to-wit:

1. That your petitioners are residents of Wichita Falls, Texas, but are presently operating in the State of New Mexico, and more specifically in the County of Lea; that they presently have a producing gas well located on the NW $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 3 T 20S, R37E which well has been drilled to a depth of approximately 3,560 feet in the Queens Sand, and the casing point being at an approximate depth of 3,523 feet; that said well has a potential production capacity of between 25,000,000 and 35,000,000 cubic feet per day; that this well was completed during the month of May, 1950.

2. That within the same area, and from the same producing sand, as hereinabove described in paragraph 1, and having the same potential production capacity as the producing well of the petitioners, there are at the present time three other gas producing wells as follows:

(a) The Clark and Christie, Shell State No. 1 located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 3, T20S, R37E, owned by the El Paso Natural Gas Company.

(b) The Nolan and Lane, Williams No. 1, located in the SW $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 34, T19S, R37E, presently owned by Nolan and Byron.

(c) The Nolan and Lane, Williams No. 2, located in the S $\frac{1}{2}$ SE $\frac{1}{4}$ of Section 34, T19S, R37E, presently owned by Nolan and Byron.

3. Your petitioners further state that the initial well head pressure at the petitioners well was 1140 pounds, and that the present shut in pressure is approximately 1000 pounds indicating a reduction in pressure of approximately 140 pounds which your petitioners state on information and belief is due to waste, improper conservation and improper utilization.

4. Your petitioners further state to the New Mexico Oil Conservation Commission that the present potential market for gas produced from the proposed field totals only about 7,000,000 cubic feet per day; that the Lea County Water Company presently purchases from the Nolan and Lane, Williams No. 2 well, presently owned by Nolan and Byron approximately 1,500,000 cubic feet per day, but that the Warren Petroleum Company, presently purchases from Nolan and Byron, who are the present owners of the Nolan and Lane, Williams No. 1 well approximately 4,000,000 cubic feet of gas per day, and that the El Paso Natural Gas Company, from its own Clark and Christie, Shell State No. 1, well take only approximately 500,000 cubic feet of gas per day; that no gas is purchased by any existing purchaser in the area above described from the well of your petitioners, though your petitioners have offered, in good faith, to sell to the existing purchasers your petitioners pro rata share of the gas marketed in the area above described, upon a reasonable basis and in accord with good marketing practices in that area.

5. That all of the gas produced in that area is dry gas.

WHEREFORE, your petitioners pray the New Mexico Oil Conservation Commission, as follows:

1. For an order directed to the producers in the area above described, to immediately shut down the production of gas until further order of the New Mexico Oil Conservation Commission and thus prevent waste and insensible

depletion of the natural gas in said field.

2. That a hearing be set upon this before the New Mexico Oil Conservation Commission, at a day and time certain, at Santa Fe, New Mexico; that notice be given to all parties concerned of such hearing in the manner required by the Rules and Regulations of the New Mexico Oil Conservation Commission, for the following purposes, to-wit:

(a) Pursuant to Rule 601 the designation of the area described in the petition as the Monument Gas Pool, or some other appropriate designation.

(b) That pursuant to Rule 602, the gas production in the designated pool be allocated proportionately to each producer in said field, and fix the allowable production of the designated pool, and to allocate to each producer the amount of gas to be delivered to the purchasers of gas in said area, and for an order to prevent discrimination by any purchaser as between producers in the proposed gas pool.

(c) To issue such orders to prevent waste, as may seem proper to the New Mexico Oil Conservation Commission for the best interest of the State of New Mexico, and for such other orders as may seem proper herein.

CLARK AND CHRISTIE

By


A. L. Zinn


Dean S. Zinn

Salmon Building
Santa Fe, New Mexico

Attorneys for Petitioners