

BEFORE THE OIL CONSERVATION COMMISSION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION OF NEW MEXICO FOR  
THE PURPOSE OF CONSIDERING:

Case No. 425

THE APPLICATION OF GREENBRIER OIL COMPANY FOR  
PERMISSION TO DRILL ON UNORTHODOX  
DRILLING UNIT

WAIVER OF NOTICE AND CONSENT TO UNORTHODOX  
DRILLING UNIT

Comes now Aztec Oil and Gas Company and in connection  
with the above described matter states:

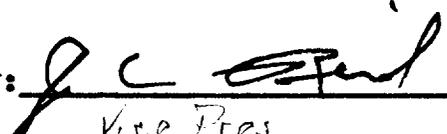
1. That Greenbrier Oil Company furnished Aztec Oil and  
Gas Company with a copy of its petition and a copy of its  
amended petition addressed to the Oil Conservation Commission  
in which the said Greenbrier Oil Company requested permission  
to drill on unorthodox drilling unit covering the following  
described land situated in San Juan County, New Mexico, to-wit:

T. 31 N., R. 12 W., N.M.P.M.,  
Sec. 23: NE $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$ ;  
24: NW $\frac{1}{4}$ NW $\frac{1}{4}$ ,  
containing 320 acres, more or less.

2. That the undersigned owns and holds option agreements,  
operating agreements or leasehold rights on all of the lands  
adjacent to and surrounding the lands hereinabove described,  
and does by these presents consent to the granting of the  
amended petition of the petitioner, Greenbrier Oil Company, for  
an unorthodox drilling unit embracing the lands hereinabove  
described.

3. The undersigned, Aztec Oil and Gas Company, hereby  
waives the ten day written notice which is required to be given  
by the Commission and agrees that the Commission may proceed  
to grant the application of the petitioner without further  
notice to the undersigned.

Respectfully submitted,  
AZTEC OIL AND GAS COMPANY

By: 

Vice Pres. 

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P E T I T I O N

Comes now the Greenbrier Oil Company, by G. W. R. Hoy, their attorney, and makes the following application to the Oil and Gas Conservation Commission of the State of New Mexico as follows:

1. That Greenbrier Oil Company is a corporation qualified to do business in the State of New Mexico as a foreign corporation.

2. That applicant herein now owns and holds a valid and subsisting oil and gas lease embracing and covering the following described land situate in San Juan County, New Mexico, to-wit:

Twp. 31 N., R. 12 W., N.M.P.M.

Sec. 23: NE $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$

Sec. 24: NW $\frac{1}{4}$ NW $\frac{1}{4}$

Containing 320 acres, more or less.

3. That your petitioner is informed and believes, and upon information and belief alleges that the Southern Union Gas Company owns and holds leasehold rights on all lands adjacent to the hereinabove described lands held by your petitioner under oil and gas lease.

4. That your petitioner is unable to obtain more land under lease in the E $\frac{1}{2}$  of said Sec. 23, nor in the S $\frac{1}{2}$  of said Sec. 23.

5. That the Southern Union Gas Company now has producing oil and gas wells offsetting the 280 acres hereinabove described in said Sec. 23; that attached hereto, and made a part hereof for greater certainty, is a letter from the Aztec Oil and Gas Company reciting that said company now owns and holds options, operating or contractual rights covering all of the lands immediately surrounding the said proposed operating unit, and further stating that said Aztec Oil and Gas Company has no objections to the approval of an unorthodox drilling unit on said 280 acres situate in the E $\frac{1}{2}$  of said Sec. 23, namely:

Twp. 31 N., R. 12 W., N.M.P.M.

Sec. 23: NE $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$ ,  
Containing 280 acres, more or less.

6. That your petitioner herein is informed and believes, and upon information and belief alleges, that a portion of the land under lease or other contractual rights held by said Aztec Oil and Gas Company is land situate in the public domain of the United States of America, and that the United States Geological Survey is an interested party in these proceedings from the standpoint of royalties which are payable or will become payable to the United States under the operations and development of said public domain land by said Aztec Oil and Gas Company.

WHEREFORE, your petitioner prays that it be granted permission to drill a well for the production of gas on said lands now held under lease by your petitioner in said Sec. 23; that said proposed well, if permission is granted by the Oil and Gas Conservation Commission, will be drilled in the center, or within <sup>3</sup>320 feet radius thereof, of the SE $\frac{1}{4}$  of said Sec. 23.

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G. W. R. Hoy  
Attorney for Greenbrier Oil  
Company

STATE OF COLORADO )  
                          )    SS  
COUNTY OF MESA     )

G. W. R. Hoy, of lawful age, upon his oath says:

That he verifies the foregoing petition on behalf of the Greenbrier Oil Company for the reason that said company does not have an official, nor office, in San Juan County, New Mexico.

That this affiant has read the foregoing petition and is familiar with the contents thereof; that the statements made therein are true, except as to those statements made upon information and belief, and as to those statements he believes them to be true.

\_\_\_\_\_  
  
Subscribed and sworn to before me this 8th day of October,  
1952.

\_\_\_\_\_  
Notary Public

My commission expires:  
\_\_\_\_\_

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A M E N D E D P E T I T I O N

Comes now the Greenbrier Oil Company, by R. Q. Abrams, their landman, and makes the following application to the Oil and Gas Conservation Commission of the State of New Mexico as follows:

1. That Greenbrier Oil Company is a partnership and has filed blanket bonds covering its operation in the State of New Mexico. That applicant may be addressed at 327 South Adams Street, Fort Worth, Texas.

2. That applicant herein now owns and holds a valid and subsisting oil and gas lease embracing and covering the following described land situate in San Juan County, New Mexico, to-wit:

Twp. 31 N., R. 12W., N.M.P.M.

Sec. 23; NE $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$

Sec. 24; NW $\frac{1}{4}$ NW $\frac{1}{4}$

Containing 320 acres, more or less.

3. That your petitioner is informed and believes, and upon information and belief alleges that the Aztec Oil & Gas Company, Burt Building, Dallas, Texas, owns and holds leasehold rights on all lands adjacent to and surrounding the hereinabove described lands held by your petitioner under oil and gas lease.

4. That your petitioner is unable to obtain more land under lease in the E $\frac{1}{2}$  of said Sec. 23, nor in the S $\frac{1}{2}$  of said Sec. 23.

5. That the Aztec Oil & Gas Company now has a producing gas well located 990' from the North and West lines of Sec. 23, Twp. 31 N., R. 12 W., N.M.P.M., offsetting the 320 acres hereinabove described; that attached hereto, and made a part hereof, is a letter from the Aztec Oil & Gas Company reciting that said company now owns and holds options, operating or contractual rights covering all of the lands immediately surrounding the said proposed operating unit, and further stating that said Aztec Oil & Gas Company has no objections to the approval of an unorthodox drilling unit consisting of said 320 acres described as follows:

Twp. 31 N., R. 12 W., N.M.P.M.

Sec. 23:  $NE\frac{1}{4}$ ,  $N\frac{1}{2}SE\frac{1}{4}$ ,  $SW\frac{1}{4}SE\frac{1}{4}$ ,  
Sec. 24:  $NW\frac{1}{4}NW\frac{1}{4}$ ,  
Containing 320 acres, more or less.

6. That your petitioner herein is informed and believes, and upon information and belief alleges, that a portion of the land under lease or other contractual rights held by said Aztec Oil & Gas Company is land situate in the public domain of the United States of America, and that the United States Geological Survey is an interested party in these proceedings from the standpoint of royalties which are payable or will become payable to the United States under the operations and development of said public domain land by said Aztec Oil & Gas Company.

7. That the above described lands are adjacent to lands originally designated as being a part of the La Plata (Mesaverde) Pool. That the gas wells completed in said pool have been completed on a 320 acre spacing pattern and were drilled in the Northwest and Southeast quarters of the sections comprising the pool.

8. That the granting of an order authorizing the proposed unorthodox drilling unit will be in the interest of conservation, will prevent waste, and will protect the correlative rights of interested parties in the area surrounding said unit.

9. That there is attached hereto a plat showing to scale the property

on which their exception is sought and accurately showing all other completed drilling and permitted wells on this property and all adjoining surrounding properties.

WHEREFORE, your petitioner prays that it be granted permission to drill and complete a well for the production of gas on said lands now held under lease by your petitioner; that said well, if permission is granted by the Oil and Gas Conservation Commission, will be drilled 1650' from the South and 990' from the East lines of Sec. 23, Twp. 31 N., R. 12 W., N.M.P.M.

*R. Q. Abrams*

\_\_\_\_\_  
R. Q. Abrams  
Landman, Greenbrier Oil Company

STATE OF ~~TEXAS~~ <sup>NEW MEXICO</sup> )  
                  ~~TARRANT~~ <sup>SANTA FE</sup> ) SS  
COUNTY OF ~~TARRANT~~ )

R. Q. Abrams, of lawful age, upon his oath says:

That this affiant has read the foregoing petition and is familiar with the contents thereof; that the statements made therein are true, except as to those statements made upon information and belief, and as to those statements he believes them to be true.

*R. Q. Abrams*

Subscribed and sworn to before me this 14th day of November, 1952.

*Ida Rodriguez*  
\_\_\_\_\_  
Notary Public in and for  
~~Tarrant~~ County, ~~Texas~~  
SANTA FE N.M.

My commission expires:

June 1, 1953 11-22-53