



(b) The Texas Company failed to use reasonable efforts to secure approval from royalty interests underlying the proposed unit to the pooling of said royalty interests with the acreage of Schermerhorn and Moore to form a larger gas proration unit, and Finding No. (7) of the Commission is therefore erroneous and unreasonable.

(c) It is practical and equitable to force the pooling of The Texas Company unit acreage with the acreage of Schermerhorn and Moore as above described, and Finding No. (8) is therefore erroneous and unreasonable and arbitrary.

(d) That the approval of the application of The Texas Company and the drilling of the unit well will result in the clustering of gas wells in the N $\frac{1}{2}$  of Section 12, Township 21 South, Range 36 East, resulting in inequitable withdrawals from the reservoir and will adversely affect the correlative rights of the applicants herein, both as to acreage within Section 12 as well as acreage within Section 7.

4. Order No. R-621 deprives applicants of their property without due process of law.

WHEREFORE, applicants request a rehearing in Case No. 854 before the Commission.

Respectfully submitted,  
SCHERMERHORN OIL CORPORATION

J. H. MOORE

By   
Jack M. Campbell

For CAMPBELL & RUSSELL  
their attorneys