

BEFORE THE OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF M. A. ROMERO AND ROBERT CRITCHFIELD REQUESTING THE OIL CONSERVATION COMMISSION TO INVESTIGATE THE OPERATION OF GAS PRORATIONING IN THE BLANCO MESA VERDE POOL IN RIO ARRIBA COUNTY, NEW MEXICO, AND THE CHOZA MESA PICTURED CLIFF POOL IN RIO ARRIBA COUNTY, NEW MEXICO, AND TO ENTER SUCH ORDERS AS IT DEEMS NECESSARY, AFTER HEARING, TO REQUIRE RATABLE TAKING OF GAS FROM SAID POOLS AND TO OTHERWISE PROTECT CORRELATIVE RIGHTS OF OWNERS OF INTEREST IN SUCH POOLS.

103 P. 2d 557

CASE NO. 1600

APPLICATION

Come now M. A. Romero of Santa Fe, New Mexico, and Robert Critchfield of Wooster, Ohio, by and through their attorneys, Campbell & Russell of Roswell, New Mexico, and state:

1. Applicants are the owners of working interests and overriding royalty interests in Township 28 North, Range 4 West and Township 29 North, Range 4 West, in Rio Arriba County, New Mexico.

2. A portion of said townships is included in the Blanco Mesa Verde Pool and in the Choza Mesa Pictured Cliff Pool, each of which is subject to gas prorationing under orders previously entered by the Commission.

3. Said orders were entered by the Commission for the purpose of preventing waste and were intended to protect the correlative rights of owners of interests in the said pools, based upon the allocation of gas to individual wells.

4. Applicants believe that the prorationing of gas in each of said pools has not provided for ratable taking of gas as required by law and that in this manner the correlative rights of applicants have been adversely affected.

5. Applicants believe that purchasers of gas from applicants' properties, who are in some instances identical with the operators of the properties under a Unit Agreement, have neglected and failed to provide gas pipeline facilities with pressures which will permit

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the entry and transmission of applicants' gas under conditions of deliverability, such deliverability being a part of the gas allocation formula in the said pools.

6. Applicants believe that the operators of applicants' wells, including the purchasers who operate said wells, have failed and neglected to complete some of applicants' wells in a prudent manner and that, inasmuch as deliverability is a factor in allocating production for the purpose of providing ratable taking of gas, that applicants are entitled to relief from the Commission so that its wells may be completed in such a manner as to provide maximum deliverability under tests required by Commission orders.

7. Applicants believe that gas purchasers have failed to reasonably connect gas wells of applicants and that said purchasers are unreasonably discriminating between applicants' wells and other wells in the pools involved.

WHEREFORE, Applicants request the Commission to call a hearing for the purpose of investigating the operation of gas prorationing in the Blanco Mesa Verde Pool and the Choza Mesa Pictured Cliff Pool in Rio Arriba County, New Mexico, and after hearing, to enter such orders as it deems necessary to provide for ratable taking of gas from said pools and otherwise protect correlative rights of owners of interests in said pools and to publish notice of such hearing as required by law.

Respectfully submitted,

CAMPBELL & RUSSELL

By: Jack M. Campbell

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Attorneys for Applicants

Dated January 27, 1959