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ATTORNEYS AND COUNSELORS AT LAW  
SUITE 152 PETROLEUM CENTER BUILDING  
FARMINGTON, NEW MEXICO

October 29, 1962

*Case 2700*

GEO. L. VERITY  
JOEL B. BURR, JR.  
WM. J. COOLEY

NORMAN S. THAYER

RAY B. JONES

TELEPHONE 325-1702

Oil Conservation Commission  
State of New Mexico  
Post Office Box 871  
Santa Fe, New Mexico

Re: The application of Southwest Production  
Company for an order force pooling the  
Basin-Dakota formation underlying the  
W $\frac{1}{2}$  of Section 3, T-30-N, R-11-W, N.M.P.M.,  
San Juan County, New Mexico.

Gentlemen:

Enclosed please find the above referenced force pooling application  
of Southwest Production Company.

Please set this matter for hearing as soon as possible.

Very truly yours,

VERITY, BURR & COOLEY

By

  
Geo. L. Verity

GLV/kp  
Encs.

DOCKET MAILED

Date \_\_\_\_\_

BEFORE THE OIL CONSERVATION COMMISSION

OF THE STATE OF NEW MEXICO

IN THE MATTER OF:

THE APPLICATION OF SOUTHWEST )  
PRODUCTION COMPANY FOR AN ORDER )  
FORCE POOLING THE BASIN-DAKOTA )  
FORMATION UNDERLYING THE WEST )  
HALF (W $\frac{1}{2}$ ) OF SECTION 3, TOWNSHIP )  
30 NORTH, RANGE 11 WEST, SAN )  
JUAN COUNTY, NEW MEXICO. )

No. 2700

POOLING APPLICATION

Comes now the applicant, Southwest Production Company, a co-partnership consisting of Joseph P. Driscoll and John H. Hill, and for its application alleges and states:

1. That it is the owner of oil and gas leases covering portions of the West Half (W $\frac{1}{2}$ ) of Section 3, Township 30 North, Range 11 West, N.M.P.M., in San Juan County, New Mexico, and that it has drilled and completed a well in the Dakota formation in the West Half (W $\frac{1}{2}$ ) of said Section 3, 950 feet from the South line and 1735 feet from the West line.

2. That there are various parts of the West Half (W $\frac{1}{2}$ ) of the above described Section 3 that are unleased, whose owners have not agreed to join with the applicant in the drilling, completion and producing of the above described well and, although the applicant has made a reasonable effort to obtain oil and gas leases and/or the joinder of the owners of the unleased portions of the above described proration unit, it has been unable to obtain such leases and/or the joinder of the owners of the unleased portions of said unit, and the applicant, therefore, desires that the interest of any and all of said persons be force pooled in accord with the statutes of the State of New Mexico and the rules and regulations of the Oil Conservation Commission of the State of New Mexico.

3. That applicant desires to dedicate the Basin-Dakota

production from the above described well located in the above described Section 3 to the entire West Half ( $W\frac{1}{2}$ ) of Section 3, and that the Commission should constitute the applicant as the "Operator" of the pooled unit.

4. That applicant has undergone considerable risk in the drilling and completion of the above referred to well, and that under the statutes of the State of New Mexico and the rules and regulations of the Oil Conservation Commission applicant is entitled to, and should be allowed to take and receive  $\frac{7}{8}$ ths of any and all production had from the above referenced well until such time as it has been reimbursed in an amount equal to 125% of its actual cost of drilling, completing and equipping said well, plus a reasonable compensation for the supervision of the drilling and completion thereof, and a reasonable compensation for the operation thereof.

5. That the force pooling order herein requested is necessary in order to prevent waste and in order to protect the correlative rights of the parties.

6. That a list of the interested parties in this application, together with their addresses, insofar as the same are known to the applicant, is set out on Exhibit "A" attached hereto and made a part hereof.

WHEREFORE, applicant prays that this application be set down for hearing at the earliest possible date, that due notice thereof be given in accord with the rules and regulations of this Commission, and the laws of the State of New Mexico, and that after hearing, from the evidence to be adduced thereat this Commission enter its order granting the application as above stated.

Respectfully submitted,

VERITY, BURR & COOLEY

By

  
Geo. L. Verity  
Attorneys for applicant  
Southwest Production Company

EXHIBIT "A"

✓ Alton K. Brown	La Plata, New Mexico
J. G. Brown	Durango Highway Aztec, New Mexico
✓ W. S. Martin ✓ Sally Martin	Route 1, Box 11-A Aztec, New Mexico
✓ Frank M. Rucker	Route 1, Box 10 Aztec, New Mexico
✓ Everett Wallace ✓ Myrtle F. Wallace	Aztec, New Mexico
DeWitt Brown	Unknown
✓ Herbert D. Wright ✓ Barbara Jane Wright	Aztec, New Mexico

*Order P-2378  
mailed 11/28/62  
Jr*