

**MONTGOMERY, FEDERICI, ANDREWS, HANNAHS & MORRIS**

J. O. SETH (1883-1963)

ATTORNEYS AND COUNSELORS AT LAW

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SANTA FE, NEW MEXICO 87501

POST OFFICE BOX 2307  
AREA CODE 505  
TELEPHONE 982-3876

January 17, 1972

New Mexico Oil Conservation Commission  
State Land Office Building  
Santa Fe, New Mexico 87501

Attention: Honorable Elvis A. Utz  
Hearing Examiner

Re: Case No. 4642, Application of Fluid Power Pump  
Company for Special Pool Rules and a Pressure  
Maintenance Project, Sandoval County, New Mexico;  
Examiner Hearing of January 19, 1972

Gentlemen:

This firm represents Mrs. Billie Robinson and Mr. L. Claude Roark, who are the owners of overriding royalty interests in the NW/4 of Section 23, Township 19 North, Range 3 West, Sandoval County, New Mexico, which lands lie within the pressure maintenance project proposed by Fluid Power Pump Company in the subject case. Mrs. Robinson and Mr. Roark also own overriding royalty interests in the NE/4 of said Section 23, and in the E/2 NW/4 of Section 22, and in other lands in the vicinity of the proposed pressure maintenance project.

It is our understanding from the application in this case that Fluid Power Pump Company intends to drill a water injection well in the SE/4 NW/4 of Section 23 to be used in connection with its proposed pressure maintenance project covering portions of Sections 10, 11, 14, 15, 22 and 23, Township 19 North, Range 3 West, Sandoval County, New Mexico. Our clients do not own any interest in the lands covered by the proposed pressure maintenance project other than the overriding royalty interest in the NW/4 of said Section 23. At the present time, there is no producing well located in the NW/4 of Section 23, and under the proposed pressure maintenance project a water injection well, but no producing well, would be located on that quarter section.

On behalf of Mrs. Robinson and Mr. Roark, we object to the proposed pressure maintenance project unless the applicant is willing to unitize the project or dedicate proration units across the section line common to Sections 14 and 23 in such a manner as to protect

New Mexico Oil Conservation Commission  
January 17, 1972  
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the correlative rights of our clients.

As part of its application, Fluid Power Pump Company seeks the establishment of 160-acre oil proration units for this area; however, the SW/4 of Section 14 already has been developed on 40-acre spacings. In view of the wells that already have been drilled in the SW/4 of Section 14 and the absence of producing wells in the NW/4 of Section 23, we would suggest that a 160-acre proration unit be established consisting of the E/2 SW/4 of Section 14, and the E/2 NW/4 of Section 23, and that another 160-acre proration unit be established consisting of the W/2 SW/4 of Section 14 and the W/2 NW/4 of Section 23. Of course, another alternative for protecting my clients' correlative rights would be for the applicant to drill one or more producing wells in the N/2 NW/4 of Section 23 as direct offsets to the wells in the S/2 SW/4 of Section 14, depending upon what spacing is adopted for this pool.

If necessary for the protection of my clients' correlative rights, we request that the decision on the subject application be postponed until such time as the additional or supplemental applications are filed and heard pertaining to unitization of the pressure maintenance project or the establishment of non-standard proration units covering the SW/4 of Section 14 and the NW/4 of Section 23.

Very truly yours,



RSM:F

cc: Mr. Jason W. Kellahin  
Attorney at Law  
P.O. Box 1769  
Santa Fe, N.M. 87501

**TEFTELLER, INC.**

reservoir engineering data

Associated with *Dennis Owens Co.*

MIDLAND, TEXAS / FARMINGTON, NEW MEXICO

P. O. Box 5247  
Midland, Texas 79701

April 13, 1971

Don C. Wiley & Fluid Power Pump Company  
900 Bank of New Mexico Building  
Albuquerque, New Mexico

Attention: Mr. Val R. Reese

Subject: Fluid Level Measurements  
2 Wells  
Sandoval County, New Mexico  
Our File No. 2-4183-FL

Gentlemen:

Attached hereto are the results of the fluid level measurements which were made on the above captioned wells April 5, 1971.

The data presented are in graphical form.

It has been our pleasure to have conducted this service for you. If we may be of further assistance, please call us at any time.

Respectfully submitted,

TEFTELLER, INC.

*Neil Tefteller*  
Neil Tefteller

NT/kb

**TEFTELLER, INC.**  
**RESERVOIR ENGINEERING DATA**  
 Midland, Texas

Company: DON C. WILEY & FLUID POWER PUMP COMPANY Page 1 of 1  
 County: SANDOVAL File 2-4183-FL  
 Date: APRIL 5, 1971

TEST DATA

Lease and Well Number	Strokes Per Minute	Casing Pressure Psi	Average Tubing Length Feet	Number Joints To Fluid	Fluid Level Feet
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Medio No. 1	10-60"s/m	30			Flowing thru casing
Medio No. 2	10-60"s/m	30			Flowing thru casing

**TEFTELLER, INC.**

reservoir engineering data

MIDLAND, TEXAS / FARMINGTON, NEW MEXICO

Associated with *Dennis Owens Co.***P. O. Box 5247****Midland, Texas 79701**

July 12, 1971

Don C. Wiley & Fluid Power Pump Co.  
900 Bank of New Mexico Bldg.  
Albuquerque, New Mexico

Attention: Mr. Val R. Reese

Subject: Fluid Level Measurements  
3 wells  
Sandoval County, New Mexico  
Our File No. 2-4291-FL

Gentlemen:

Attached hereto are the results of fluid level measurements  
which were made in subject county July 5, 1971.

The data presented are in tabular form.

It has been our pleasure to have conducted this service for you.  
If we may be of further assistance, please call us at anytime.

Respectfully submitted,

TEFTELLER, INC.

*Farrest Tefteller*  
Farrest Tefteller

FT/bt

TEFTELLER, INC.  
RESERVOIR ENGINEERING DATA  
Midland, Texas

Company : DON C. WILEY & FLUID POWER PUMP CO.

Date : JULY 5, 1971

Field :

File No. : 2-4291-FL

TEST DATA

Lease and Well Number	Strokes Per Minute	Casing Pressure Psi	Average Tubing Length Feet	Number Joints to Fluid	Fluid Level Feet
MEDIO NO. 1	10-s/m	0	31.5	13	410
MEDIO NO. 2	20-s/m	0	31.5	6	189
MEDIO NO. 4	16-s/m	5	31.5	28	882

TEFTELLER, INC.

reservoir engineering data

MIDLAND, TEXAS / FARMINGTON, NEW MEXICO

Associated with *Dennis Owens Co.*

P. O. Box 5247

Midland, Texas 79701

October 4, 1971

Don C. Wiley & Fluid Power Pump Co.  
900 Bank of N. M. Building  
Albuquerque, New Mexico

Attention: Mr. Val R. Reese

Subject: Fluid Level Measurements  
Medio No. 1 & 2  
Sandoval County, New Mexico  
Our File No. 2-4371-FL

Gentlemen:

Attached hereto are the results of fluid level measurements  
which were made on the above captioned well September 27, 1971.

The data presented are in tabular and graphical form.

It has been our pleasure to have conducted this service for you.  
If we may be of further assistance, please call us at any time.

Respectfully submitted,

TEFTELLER, INC.

*Neil Tefteller*

Neil Tefteller

NT/ct

TEFTELLER, INC.  
RESERVOIR ENGINEERING DATA  
Midland, Texas

Company : DON C. WILEY & FLUID POWER PUMP CO.

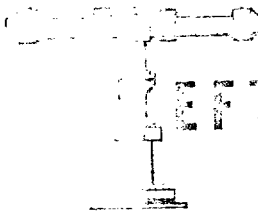
Page 1 of 1

Field :

File 2-4371-F1

TEST DATA

Date	Lease and Well Number	Strokes Per Minute	Casing Pressure Psi	Average Tubing Length Feet	Number Joints to Fluid	Fluid Level Feet
9-27-71	Medio #1		Vac.	31.5	10	315
9-27-71	Medio #2		Vac.	31.5	11	347



BHP • BU • PI • DD • GWT • RFS • GOR • FL • TS

**TEFTELLER, INC.**

reservoir engineering data

MIDLAND, TEXAS / FARMINGTON, NEW MEXICO

Associated with *Dennis Owens Co.*

**P. O. Box 5247**

**Midland, Texas 79701**

December 6, 1971

Fluid Power Pump Company  
900 Bank of N. M. Bldg.  
Albuquerque, New Mexico

Attention: Mr. Val R. Reese

Subject: Pumping Fluid Level Measurements  
Three Wells  
Sandoval County, New Mexico  
Our File No. 2-4443-FL

Gentlemen:

Attached hereto are the results of pumping fluid level measurements which were made on the above captioned county November 30, 1971.

The data presented are in tabular form.

It has been our pleasure to have conducted this service for you. If we may be of further assistance, please call us at any time.

Respectfully submitted,

TEFTELLER, INC.

Neil Tefteller

NT/ct

TEFTELLER, INC.  
RESERVOIR ENGINEERING DATA  
Midland, Texas

Company : FLUID POWER PUMP COMPANY Date : NOVEMBER 30, 1971

Field : File No. : 2-4443-FL

Lease and Well Number	Strokes Per Minute	Casing Pressure Psi	Average Tubing Length Feet	Number Joints to Fluid	Fluid Level Feet
Media No. 1	18 s/m	Vac.	31.5	20	630
Media No. 2	18 s/m	2	31.5	14	441
Fluid Power Pump No. 1	14 s/m	Vac.	31.5	18	567

TEFTELLER, INC.

reservoir engineering data

MIDLAND, TEXAS / FARMINGTON, NEW MEXICO

Associated with *Dennis Owens Co.*

P. O. Box 5247

Midland, Texas 79701

December 22, 1971

Fluid Power Pump Company  
1130 Bank of N. M. Building  
Albuquerque, New Mexico

Subject: Fluid Level Measurements  
Fluid Power Pump No. 1  
Sandoval County, New Mexico  
Our File No. 2-4448-FL

Gentlemen:

Attached hereto are the results of fluid level measurements which were made on the above captioned well December 4, 1971.

The data presented are in tabular form.

It has been our pleasure to have conducted this service for you. If we may be of further assistance, please call us at any time.

Respectfully submitted,

TEFTELLER, INC.

*Neil Tefteller*  
Neil Tefteller

NT/ct

TEFTELLER, INC.  
RESERVOIR ENGINEERING DATA  
Midland, Texas

Company : FLUID POWER PUMP COMPANY

Date : DECEMBER 4, 1971

Field :

File No. : 2-4448-FL

Lease and Well Number	Strokes Per Minute	Casing Pressure Psi	Average Tubing Length Feet	Number Joints to Fluid	Fluid Level Feet
Fluid Power Pump #1	14 s/m	Vac	31.5	20	630
Fluid Power Pump #1	Pump down 20 min.	0	31.5	16	504



# OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO  
P. O. BOX 2088 - SANTA FE  
87501

March 15, 1972

GOVERNOR  
BRUCE KING  
CHAIRMAN

LAND COMMISSIONER  
ALEX J. ARMIJO  
MEMBER

STATE GEOLOGIST  
A. L. PORTER, JR.  
SECRETARY - DIRECTOR

Mr. Jason Kellahin  
Kellahin & Fox  
Attorneys at Law  
Post Office Box 1769  
Santa Fe, New Mexico

Re: Case No. 4642

Order No. R-4277

Applicant:

Fluid Power Pump Company

Dear Sir:

Enclosed herewith are two copies of the above-referenced Commission order recently entered in the subject case.

Very truly yours,

A. L. PORTER, Jr.

Secretary-Director *ALP*

ALP/ir

Copy of order also sent to:

Hobbs OCC X

Artesia OCC       

Aztec OCC X

Other Mr. Richard S. Morris

LAW OFFICES OF  
HUNKER, FEDRIC & HIGGINBOTHAM, P.A.

210 HINKLE BUILDING

POST OFFICE BOX 1637

GEORGE H. HUNKER, JR.  
DON M. FEDRIC  
RONALD M. HIGGINBOTHAM

ROSWELL, NEW MEXICO 88201

December 21, 1972

TELEPHONE 622-2700  
AREA CODE 505

Mrs. Ida Rodriguez  
New Mexico Oil Conservation Commission  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Re: Case No. 4642  
Fluid Power Pump  
January 19, 1971

Dear Ida:

I return herewith the copy of the Transcript of Hearing in connection with the above styled case, together with the 12 exhibits which you were good enough to send me.

Thank you very much for your help and assistance. With best wishes for a Happy Holiday Season and a Prosperous New Year, we remain

Sincerely yours,

HUNKER, FEDRIC & HIGGINBOTHAM, P.A.



George H. Hunker, Jr.

GHH:dd  
Encls.

P.S. You will recall that Exhibit 3 was omitted because of its size.

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