

PADILLA & SNYDER  
ATTORNEYS AT LAW  
200 W. MARCY, SUITE 216  
P.O. BOX 2523  
SANTA FE, NEW MEXICO 87504-2523

FACSIMILE: (505) 988-7592  
TELEPHONE: (505) 988-7577

May 19, 1992

RECEIVED

MAY 19 1992

OIL CONSERVATION DIVISION

HAND-DELIVERED

William J. LeMay, Director  
Oil Conservation Division  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

10485

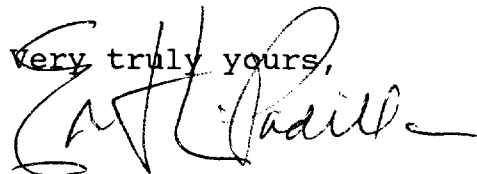
Re: Application of Mewbourne Oil Company  
For Compulsory Pooling, Turkey Track  
"15" State #1, W/2 of Section 15,  
T18S, R28E, Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is Mewbourne Oil Company's  
Application for Compulsory Pooling regarding the above-  
captioned well.

We respectfully request that this Application be placed  
on the June 11, 1992 hearing docket.

Very truly yours,



Ernest L. Padilla

ELP:mg

xc: Mewbourne Oil Company

RECEIVED

MAY 1 1962

BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION )  
OF MEWBOURNE OIL COMPANY FOR )  
COMPULSORY POOLING, EDDY COUNTY, )  
NEW MEXICO )

CASE NO. 10485

APPLICATION

COMES NOW, MEWBOURNE OIL COMPANY, by and through its attorneys, Padilla & Snyder, Attorneys At Law, and in support hereof, respectfully states:

1. Applicant has the right to drill its Turkey Track "15" State No. 1 Well to test the Morrow Formation at an approximate total depth of 10,900 feet below the surface of the earth, underlying the W/2 of Section 15, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

2. Applicant proposes to drill its well at an orthodox location 1980' FNL and 990' FWL of said Section 15 dedicating and pooling all possible proration and spacing units from the surface to the base of the Morrow Formation as follows:

(a) W/2 of Section 15 - all formations and pools spaced on 320 acres.

(b) NW/4 of Section 15 - all formations and pools spaced on 160 acres.

(c) W/2NW/4 or S/2NW/4 of Section 15 - all formations and pools spaced on 80 acres.

(d) SW/4NW/4 of Section 15 - all formations and pools spaced on 40 acres.

3. There are interest owners in the proration units who have not agreed to pool their interests.

4. Applicant should be designated the operator of the well and the proration unit.

5. To avoid the drilling of unnecessary wells, to protect correlative rights, and to afford to the owner of each interest in said unit the opportunity to recover or receive, without unnecessary expense, his just and fair share of the oil in said unit, all mineral interests, whatever they may be, from the surface to the base of the Morrow Formation should be pooled.

6. That any non-consenting working interest owner that does not pay his share of estimated well costs should have withheld from production his share of the reasonable well costs, plus an additional 200% thereof as a reasonable charge for the risk involved in the drilling of the well.

7. Applicant should be authorized to withhold from production the proportionate share of a reasonable supervision charge for drilling and producing wells attributable to each non-consenting working interest owner.

WHEREFORE, applicant prays that:

A. This application be set for hearing before an examiner and that notice of said hearing be given as required by law.

B. Upon hearing, the Division enter its order pooling all mineral interests, whatever they may be, from the surface to the base of the Morrow Formation in accordance with Paragraph 2 above.

C. And for such other relief as may be just in the premises.

Respectfully submitted:

PADILLA & SNYDER

By:



Ernest L. Padilla

P. O. Box 2523

Santa Fe, New Mexico 87504-2523

Attorneys for Applicant

RECEIVED

MAY 1 1965

BEFORE THE OIL CONSERVATION DIVISION ~~OIL CONSERVATION DIVISION~~  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION )  
OF MEWBOURNE OIL COMPANY FOR )  
COMPULSORY POOLING, EDDY COUNTY, )  
NEW MEXICO )  
\_\_\_\_\_)

CASE NO. 10485

APPLICATION

COMES NOW, MEWBOURNE OIL COMPANY, by and through its attorneys, Padilla & Snyder, Attorneys At Law, and in support hereof, respectfully states:

1. Applicant has the right to drill its Turkey Track "15" State No. 1 Well to test the Morrow Formation at an approximate total depth of 10,900 feet below the surface of the earth, underlying the W/2 of Section 15, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

2. Applicant proposes to drill its well at an orthodox location 1980' FNL and 990' FWL of said Section 15 dedicating and pooling all possible proration and spacing units from the surface to the base of the Morrow Formation as follows:

(a) W/2 of Section 15 - all formations and pools spaced on 320 acres.

(b) NW/4 of Section 15 - all formations and pools spaced on 160 acres.

(c) W/2NW/4 or S/2NW/4 of Section 15 - all formations and pools spaced on 80 acres.

(d) SW/4NW/4 of Section 15 - all formations and pools spaced on 40 acres.

3. There are interest owners in the proration units who have not agreed to pool their interests.

4. Applicant should be designated the operator of the well and the proration unit.

5. To avoid the drilling of unnecessary wells, to protect correlative rights, and to afford to the owner of each interest in said unit the opportunity to recover or receive, without unnecessary expense, his just and fair share of the oil in said unit, all mineral interests, whatever they may be, from the surface to the base of the Morrow Formation should be pooled.

6. That any non-consenting working interest owner that does not pay his share of estimated well costs should have withheld from production his share of the reasonable well costs, plus an additional 200% thereof as a reasonable charge for the risk involved in the drilling of the well.

7. Applicant should be authorized to withhold from production the proportionate share of a reasonable supervision charge for drilling and producing wells attributable to each non-consenting working interest owner.

WHEREFORE, applicant prays that:

A. This application be set for hearing before an examiner and that notice of said hearing be given as required by law.


B. Upon hearing, the Division enter its order pooling all mineral interests, whatever they may be, from the surface to the base of the Morrow Formation in accordance with Paragraph 2 above.

C. And for such other relief as may be just in the premises.

Respectfully submitted:

PADILLA & SNYDER

By:

  
Ernest L. Padilla

P. O. Box 2523

Santa Fe, New Mexico 87504-2523

Attorneys for Applicant