

*Sounds feasible to me. m. g.  
What do you think Bob?  
K. J. [unclear]*

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W. THOMAS KELLAHIN  
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OF COUNSEL

SANTA FE, NEW MEXICO 87504-2265

October 23, 1991

Mr. William J. LeMay  
Oil Conservation Division  
State Land Office  
Santa Fe, New Mexico 87501

HAND DELIVERED

RE: NMOCD Case No. 8352 (Reopened)  
West Bravo Dome Pool Rules

RECEIVED

OCT 23 1991

Dear Mr. LeMay:

OIL CONSERVATION DIVISION

Our firm represented Oxy USA Inc. (formerly Cities Service Oil & Gas Corporation) in the two prior hearings in this case and now enters our appearance in its behalf in the referenced case set for hearing on October 31, 1991.

Because of prior commitments by my expert and me, we are unable to attend either the October 31st or the November 7th hearing and request that this matter be continued to the Examiner Hearing scheduled for November 21, 1991.

This case appears on the docket as a result of ordering paragraph (2) of Order R-7737-A which provides:

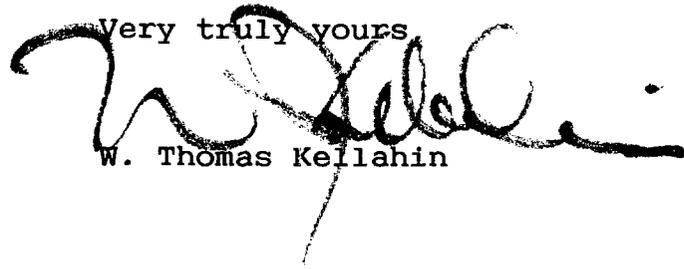
(2) This case shall be reopened at an examiner hearing in October, 1991, or two years from the date of first production from the subject area, whichever occurs first, at which time the operators in the subject area may appear and show cause why the West Bravo Dome Carbon Dioxide Gas Area should not be developed on less than 640-acre spacing and proration units.

Because production history from wells in the subject area is still not available, there is no basis for making any changes in the rules nor any reason to make the rules permanent at this time. We have contacted both Chevron USA and Amer:da Hess Corporation, the two other major operators in the pool

William J. LeMay  
October 23, 1991  
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and they concur in this request. Accordingly, we would request that the case be re-advertised to indicate that in the absence of objection, the current pool rules, including 640 acre spacing, should continue to be temporary for a period of two years following the date of first production.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Thomas Keilahin', written over the typed name below.

W. Thomas Keilahin

WTK/jcl

ltrt1021.009

cc: Richard Foppiano - Oxy USA Inc.

# Memo

*From*

DIANE RICHARDSON  
*Bonding Department*

*From To Roy Johnson*

WESTERN UNION

ROY JOHNSON, HEARING OFFICER  
OIL CONSERVATION DIVISION

FROM: TED HARTLEY - ATTORNEY  
ARMAND SMITH

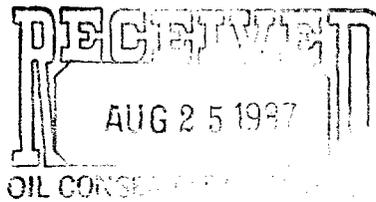
SUBJECT: WEST BRAVO DOME UNIT - HARDING COUNTY, N.M.

PROTEST NO. 1 - REQUEST UNIT BE DISSOLVED FOR LACK OF  
DEVELOPMENT BY CITY SERVICE.

NO. 2 - THAT REQUEST FOR EXTENTION OF CITY SERVICE  
BE DENIED AND THAT PERMANENT RULES BE ESTABLISHED  
WITHIN SIX MONTHS.

NO. 3- THAT SPACING UNITS WITHIN THE UNIT BE ESTABLISHED  
AT 320 ACRES.

TED HARTLEY



Oil Conservation Division Santa Fe, New Mexico 87501  
(505) 827-5800

With respect to Ms. Eggs testimony on sand uniformity - i.e. porosity & md. is conformable East to west - Why then is a B.H.P. difference (350 psi in east and 650 psi in the West Bravo Dome Unit.

Have him explain his ideas on why (by B.H.P.) this reservoir is out of equilibrium.

If the sands are so uniform with respect to  $\phi$  and md shouldn't BHP be similar throughout this entire area?

TED HARTLEY  
PO BOX 309  
CLOVIS NM 88101 25AM

Western  
Union Mailgram



4-034612S237003 08/25/87 ICS IPMRNCZ CSP AQBA  
2 5057692113 MGM TDRN CLOVIS NM 08-25 0515P EST



ROY JOHNSON HEARING OFFICER 5058275800  
NEW MEXICO OIL COMMISSION  
ENERGY AND MINERALS DIVISION  
STATE LAND OFFICE BUILDING  
PO BOX 2088  
SANTA FE NM 87504-2088

THIS IS A CONFIRMATION COPY OF A TELEGRAM ADDRESSED TO YOU:

FROM TED HARTLEY ATTORNEY FOR ARMAND SMITH  
SUBJECT WEST BRAVO DOME UNIT - HARDING COUNTY NEW MEXICO  
PROTEST

1. REQUEST UNIT BE DISSOLVED FOR LACK OF DEVELOPMENT BY CITY SERVICE
2. THAT THE REQUEST FOR EXTENSION OF CITY SERVICE BE DENIED AND THAT PERMANENT RULES BE ESTABLISHED WITHIN 6 MONTHS
3. THAT SPACING UNITS WITHIN THE UNIT BE ESTABLISHED AT 320 ACRES

TED HARTLEY  
PO BOX 309  
CLOVIS NM 88101

17:16 EST

MGMCOMP