

BENSON-MONTIN-GREER DRILLING CORP.

221 PETROLEUM CENTER BUILDING, FARMINGTON, NM. 87401 505-325-8874

September 13, 1985

New Mexico Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, NM 87501

Case 5723

Re: REQUEST TO ADVERTISE FOR HEARING
UNORTHODOX LOCATION AND FORCED POOLING

Gentlemen:

We will be asking Bill Carr to file for us an application for unorthodox location, which we would like to be set for hearing October 9, 1985.

The proposed location is in the West Puerto Chiquito Mancos pool in Rio Arriba County. The location is 1755' from the north line and 2418' from the west line of Section 30, Township 25 North, Range 1 West.

Also under this same well we would like to force pool the interests under the 640 acre proration unit.

We presume Mr. Carr will soon have in your hands official application covering this request.

Yours truly,

BENSON-MONTIN-GREER DRILLING CORP.

BY:


Albert R. Greer, President

ARG/tlp

cc: Mr. Bill Carr

CAMPBELL & BLACK, P.A.

LAWYERS

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September 19, 1985

HAND DELIVERED

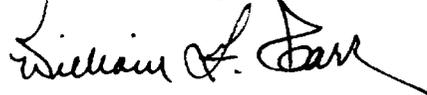
R. L. Stamets, Director
Oil Conservation Division
New Mexico Department of
Energy and Minerals
State Land Office Building
Santa Fe, New Mexico 87501

Re: Application of Benson-Montin-Greer Drilling Corp.
for Compulsory Pooling and an Unorthodox Location,
Rio Arriba County, New Mexico.

Dear Mr. Stamets:

Enclosed in triplicate is the Application of Benson-Montin-Greer Drilling Corp. in the above-referenced case. Benson-Montin-Greer Drilling Corp. requests that this matter be placed on the docket for the Examiner hearings scheduled on October 9, 1985.

Very truly yours,



William F. Carr

WFC/cv
enclosures

cc: Mr. Albert R. Greer

CONSERVATION DIVISION

SEP 19 1985

RECEIVED

Case 8723

BEFORE THE
OIL CONSERVATION DIVISION
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE APPLICATION
OF BENSON-MONTIN-GREER DRILLING CORP.
FOR COMPULSORY POOLING AND AN UNORTHODOX
LOCATION, RIO ARRIBA COUNTY, NEW MEXICO.

Case 8723

APPLICATION

Comes now, Benson-Montin-Greer Drilling Corp., by and through its undersigned attorneys and, as provided by Section 70-2-17, N.M.S.A. (1978), hereby makes application for an order pooling all of the mineral interests from the surface to the base of the Mancos formation in and under the 640-acre spacing or proration unit comprised of Section 30, Township 25 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico, and in support thereof would show the Division:

1. Applicant owns or represents approximately 93.75% of the working interest in and under Section 30 and applicant has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be drilled at an unorthodox location 1755 feet from the North line and 2418 feet from the West line of said Section 30.
3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in said Section 30, except for Mountain States Natural Gas

Corporation (Mr. Albert J. Blair, President), P.O. Box 35426, Tulsa, Oklahoma, 74135, owner of a 6.25% working interest.

4. Said pooling of interests and well completion will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

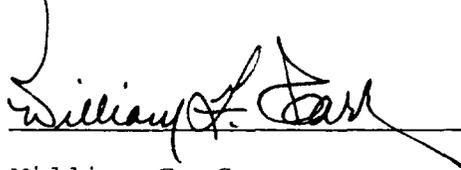
5. In order to permit the applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and applicant should be designated the operator of the well to be drilled.

WHEREFORE, applicant prays that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on October 9, 1985, and that after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the applicant in drilling, completing and equipping the well, approving the location of the well as proposed by applicant, and making such other and further provisions as may be proper in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By


William F. Carr
Post Office Box 2208
Santa Fe, New Mexico 87501
(505) 988-4421

ATTORNEYS FOR BENSON-MONTIN-GREER
DRILLING CORP.