Jason Kellahin W. Thomas Kellahin Karen Aubrey

## KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

January 3, 1986

RECEIVED

Mr. Richard L. Stamets
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

OIL CONSERVATION DIVISION

JAH GAN

Re: Sun Exploration and Production Company

Care 8812

Dear Mr. Stamets:

Enclosed please find an application for Sun Exploration and Production Company for an Unorthodox Well Location. It has already been docketed as Case 8812 for hearing on January 22, 1986.

Very truly yours,

W. Thomas Kellahin

WTK:ca Enc.

Cc: Charlie Gray
 Sun Exploration and Production Company
 P. O. Box 2880
 Dallas, Texas 75221-2880

### STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

RECEIVED

JAN 6

IN THE MATTER OF THE APPLICATION OF SUN EXPLORATION AND PRODUCTION COMPANY, FOR AN UNORTHODOX WELL LOCATION LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE: 98/2

#### APPLICATION

Comes now SUN EXPLORATION AND PRODUCTION COMPANY, by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for an order approving an unorthodox gas well location at a location 2080 feet from the North line and 750 feet from the East line of Section 24, T185, R33E, NMPM, Lea County, New Mexico, and in support thereof would show:

- 1. Applicant has the right to drill and develop the N/2 of Section 24, Tl8S, R33E, NMPM.
- 2. Applicant proposes to drill its NM Fed Com Well #1 to test the Wildcat Morrow Pool at a location 2080 feet from the North line and 750 feet from the East line of Section 24, T18S, R33E, NMPM.
- 3. Applicant proposes to dedicate a 320-acre tract consisting of the N/2 of said Section 24 to the well.
- 4. This application will prevent waste and protect correlative rights.

WHEREFORE, after notice and hearing, the applicant requests that this application be granted.

Kellahin & Kellahin

W. Thomas Kellahin

P. O. Box 2265

Santa Fe, New Mexico 87501

Attorneys for Applicant

Jason Kellahin W. Thomas Kellahin Karen Aubrey

# KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

January 14, 1986

Mr. Richard L. Stamets Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501 ELDE 8812

"Hand Delivered"

Re: Sun Exploration and Production Company

Dear Mr. Stamets:

Enclosed please find a First Amended Application for Sun Exploration and Production Company for an Unorthodox Well Location. It has already been docketed as Case 8812 for hearing on January 22, 1986. Please re-advertise and continue this case to February 5, 1986.

ACT TO THE TOTAL

w. Thomas Kellahin

WTK:ca Enc.

cc: Charlie Gray
Sun Exploration and Production Company
P. O. Box 2880
Dallas, Texas 75221-2880

Conoco Inc. Attn: Mr. Hugh Ingram P. O. Box 460 Hobbs, New Mexico 88240 (Certified Mail)

## STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF SUN EXPLORATION AND PRODUCTION COMPANY, FOR AN UNORTHODOX WELL LOCATION LEA COUNTY, NEW MEXICO.

CASE: 85/2

### FIRST AMENDED APPLICATION

Comes now SUN EXPLORATION AND PRODUCTION COMPANY, by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for an order approving an unorthodox gas well location at a location 2080 feet from the North line and 600 feet from the ne of Section 24, Tl8S, R33E, NMPM, Lea co, and in support thereof would show:

c has the right to drill and develop the , Tl8S, R33E, NMPM.

#1 to test the Wildcat Morrow Pool at a location 2080 feet from the North line and 600 feet from the East line of Section 24, T185, R33E, NMPM.

- 3. Applicant proposes to dedicate a 320-acre tract consisting of the N/2 of said Section 24 to the well.
- 4. This application will prevent waste and protect correlative rights.

5. The only offset operator other than Applicant, to which notice is required is Conoco Inc. and a copy of this application has been sent to Conoco Inc. by certified mail.

WHEREFORE, after notice and hearing, the applicant requests that this application be granted.

Kellahin & Kellahin

W. Thomas Kellahin

P. O. Box 2265 Santa Fe, New Mexico 87501

Attorneys for Applicant