HINKLE, COX, EATON, COFFIELD & HENSLEY

LEWIS C. COX
PAUL W. EATON
CONRAD E. COFFIELD
HAROLD L. HENSLEY, UR
STUART D. SHANOR
C. D. MARTIN

ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS'
THOMAS D. HAINES, JR.
THOMAS D. HORES, JR.
THOMAS D. HORES, JR.
THOMAS D. HORES
THOMAS D. HORES
THOMAS D. HORES
TO THE TOMAS D. T. MARKETTE'

GREGORY J. NIBERT

PAUL J. KELLY JR.

PAUL J. MERKETTE'

JAMES M. HUDSON

MACDONNELL GORDON

MACDONNELL GORD R CHARD A. SIMMS
RICHARD R. WILFONG'
STEVEN D. ARNOLD
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY L. FORNACIARI
JAFFREY D. HAVETT'
JAMES BRUCE
JEFFREY W. HELLBERG*

JEFFREY W. HELLBERG*

RECCON MICHARDSON*
WARE. M. RICHARDSON*
JAMES BRUCE
JEFFREY W. HELLBERG*

ANDREW J. CLOUTIER*

ATTORNEYS AT LAW

218 MONTEZUMA POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554

April 29, 1988

2800 CLAYDESTA NATIONAL BANK BUILDING POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691

1700 TEXAS AMERICAN BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569

700 UNITED BANK PLAZA POST OFFICE BOX IO ROSWELL, NEW MEXICO 88202 (505) 622-6510

OF COUNSEL
O. M. CALHOUN
MACK EASLEY
JOE W WOOD
STEPHEN L. ELLIOTT

CLARENCE E. HINKLE (1901-1985) W. E. BONDURANT, JR. (1913-1973) ROY C. SNODGRASS, JR. (1915-1987)

"NOT LICENSED IN NEW MEXICO

Florene Davidson New Mexico Oil Conservation Division State Land Office Building 87501 _____ 5 Santa Fe, New Mexico

> Case No 9372 the Application of Santa Fe Energy Operating Partners, L.P. for compulsory pooling

Dear Florene:

Enclosed are an original and two copies of an amended application in the above case. Since the amended application limits the relief requested in the original application, I do not believe that the case needs to be readvertisied.

Very truly yours,

James Bruce

HINKLE, COX, EATON, COFFIELD & HENSLEY

JB:jr

cc: W. Thomas Kellahin

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P., FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 9372

Ė

OIL CONSERVATION DIVISION

· . · · c n.

AMENDED APPLICATION

Santa Fe Energy Operating Partners, L.P., hereby makes application for an order pooling all interests from the top of the Bone Springs formation to the base of the Morrow formation in the W_2^1 of Section 30, Township 21 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and in support thereof would show:

- 1. Applicant is a working interest owner in the W_2^1 of Section 30.
- 2. Applicant proposes to drill a well in the W_2^1 of Section 30, at a standard location, to the base of the Morrow formation, and seeks to dedicate the W_2^1 of Section 30 to the Well.
- 3. Applicant has in good faith sought to join all other mineral interest owners in the $W^1_{\overline{2}}$ of Section 30 for the purposes set forth herein.
- 4. Although Applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have refused to join in dedicating their acreage. Therefore, Applicant seeks an Order pooling all mineral interest owners underlying the W½ of Section 30, from the top of the Bone Springs formation to the base of the

Morrow formation, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).

- 5. Applicant asks that the Division consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating costs and costs charged for supervision. Applicant requests that it be designated as operator of the well and that the Division set a penalty for the risk involved in drilling the well.
- 6. The pooling of interests underlying the W_2^1 of Section 30 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.
- 7. Bass Enterprises Production Company has applied to the Division for compulsory pooling of the $S_{\frac{1}{2}}$ of said Section 30, to drill a Morrow test well, and this application is set for hearing on May 11, 1988.
- 8. Applicant requests that this matter be consolidated for hearing with the application of Bass Enterprises Production Company, and that both matters be heard at the May 11, 1988 Examiner hearing.

WHEREFORE, Applicant requests that, after hearing, the Division approve this application and deny the application of Bass Enterprises Production Company.

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068

Santa Fe, New Mexico

(505) 982-4554

87504-2068

Dated: April 29, 1988

cc: W. Thomas Kellahin

Attorneys for Applicant