## CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
J. SCOTT HALL
PETER N. IVES
JOHN H. BEMIS
MARTE D. LIGHTSTONE

GUADALUPE PLACE
SUITE I - 110 NORTH GUADALUPE

POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208

TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

August 16, 1988

## HAND DELIVERED

RECEIVED

AUG 1 6 1988

OIL CONSERVATION DIVISION

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of
Energy, Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

Case 9484

Re: In the Matter of the Application of Amerind Oil Company for Compulsory Pooling, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed is the Application of Amerind Oil Company in the above-referenced case. Amerind Oil Company respectfully requests that this matter be placed on the docket for the Examiner hearings scheduled on September 14, 1988.

Very truly yours,

WILLIAM F. CARR

WFC/mlh Enclosure

cc w/enclosure: Mr. Bill Seltzer

Amerind Oil Company

RECEIVED

BEFORE THE

AUG 16 1588

OIL CONSERVATION DIVISION DIVISION DIVISION ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

case no. 9484

## APPLICATION

AMERIND OIL COMPANY by its undersigned attorneys, hereby makes application pursuant to Section 70-2-17, N.M.S.A. (1978) for an order pooling all of the mineral interests to the base of the Strawn formation in and under the S/2 NE/4 of Section 2, Township 17 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns approximately 32.5% of the working interest in and under the S/2 NE/4 of Section 2, 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 a standard location in the SE/4 NE/4 of said Section 2, to a depth of approximately 12,000 feet to test the Strawn formation, Undesignated Shipp-Strawn Pool, Undesignated Humble City-Strawn Pool and Undesignated Humble City-Atoka Pool.

3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the S/2 NE/4 of said Section 2 except for the following working interest owners:

Chevron USA 50% W.I.

Post Office Box 1150 Midland, Texas 79702

Attn: Mr. Mickey F. Cohlmia

Texaco Inc. 12.5% W.I.

Post Office Box 3109 Midland, Texas 79702 Attn: Curtis Smith

Bechtel Investments, Inc. 5% W.I.

Post Office Box 4253 Houston, Texas 77210-4253 Attn: Ms Karen Franklin

- 4. Said pooling of interests 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 September 14, 1988, 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, and making such other and further provisions as may be proper in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM FL CARR

Post Office Box 2208 Santa Fe, New Mexico 87504

(505) 988-4421

ATTORNEYS FOR AMERIND OIL COMPANY