

Stratton & Cavin, P.A.

Attorneys & Counselors at Law

OIL CONSERVATION DIVISION
RECEIVED

Harold D. Stratton, Jr.
Sealy H. Cavin, Jr.

320 Gold Avenue, S.W.
Suite 918
P.O. Box 1216
Albuquerque, New Mexico 87103-1216

NOV 12 1991
Telephone: 505/243-5400
Facsimile: 505/243-1700

November 12, 1991

Mr. William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504

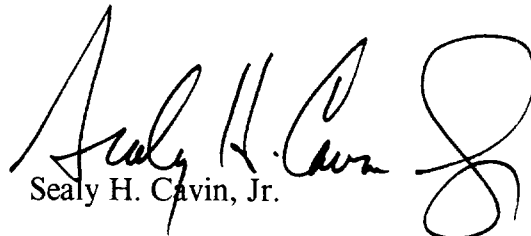
10417

**Re: In the Matter of the Application of Coquina Oil Corporation for an
Unorthodox Location, Eddy County, New Mexico**

Dear Mr. LeMay:

Enclosed herewith are triplicate originals of the above-referenced application of Coquina Oil Corporation. Coquina Oil Corporation respectfully requests that this matter be placed on the docket for the Examiner Hearing scheduled on December 5, 1991.

Very truly yours,


Sealy H. Cavin, Jr.

SHC/jas

Enclosures

cc: Dave Cromwell, Coquina Oil Corporation

BEFORE THE
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

RECEIVED

NOV 10 1991

IN THE MATTER OF THE APPLICATION
OF COQUINA OIL CORPORATION
FOR AN UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE NO. 10417

APPLICATION

COMES NOW COQUINA OIL CORPORATION, by and through its attorneys, Stratton & Cavin, P.A., and hereby makes application to the Oil Conservation Division for an Order approving an unorthodox location in the N½ of Section 34, Township 19 South, Range 25 East, N.M.P.M., Eddy County, New Mexico, and in support thereof would show the Division:

1. Applicant owns or represents approximately 100% of the working interest in and under the N½ of Section 34, and Applicant has the right to drill thereon.
2. Applicant proposes to dedicate the N½ of Section 34 to its No. 4 Pan Canadian Well to be drilled at an unorthodox location 990 feet from the north line and 990 feet from the east line of Section 34. This well will be drilled to a depth of approximately 9,700 feet to test all formations to the base of the Morrow Formation.
3. The approval of the unorthodox well location herein requested will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

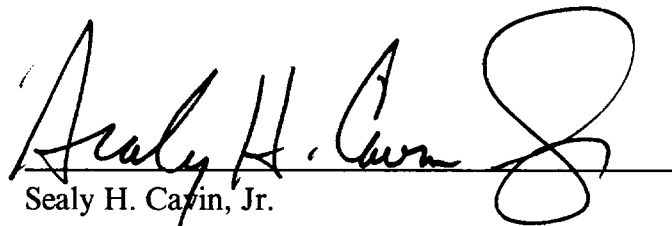
4. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the N½ of Section 34, the unorthodox location herein requested for the No. 4 Pan Canadian Well should be approved.

WHEREFORE, Applicant prays that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on December 5, 1991, and that after notice and hearing as required by law, the Division enter its Order approving the unorthodox well location herein requested, and making such other and further provisions as may be proper.

Respectfully submitted,

STRATTON & CAVIN, P.A.

By:

A handwritten signature in black ink, appearing to read "Sealy H. Cavin, Jr.", written over a horizontal line. The signature is stylized and includes a large, circular flourish at the end.

Sealy H. Cavin, Jr.

P.O. Box 1216

Albuquerque, New Mexico 87103-1216

Telephone: (505) 243-5400

Attorneys for Coquina Oil Corporation

RECEIVED

NOV 1 1991

OIL CONSERVATION DIVISION

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

IN THE MATTER OF THE APPLICATION
OF COQUINA OIL CORPORATION
FOR AN UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE NO. 10417

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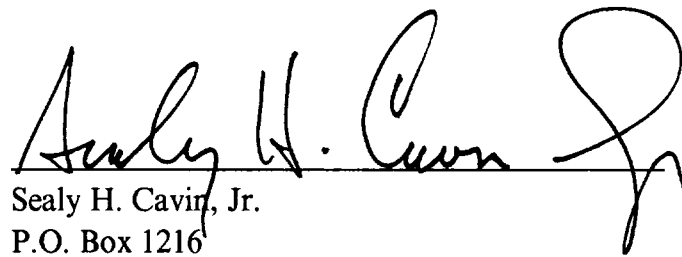
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Respectfully submitted,

STRATTON & CAVIN, P.A.

By:



Sealy H. Cavin, Jr.

P.O. Box 1216

Albuquerque, New Mexico 87103-1216

Telephone: (505) 243-5400

Attorneys for Coquina Oil Corporation

**BEFORE THE
OIL CONSERVATION DIVISION**

**NEW MEXICO DEPARTMENT OF ENERGY, MINERALS
AND NATURAL RESOURCES**

RECEIVED
NOV 1 1991

OIL CONSERVATION DIVISION

**IN THE MATTER OF THE APPLICATION
OF COQUINA OIL CORPORATION
FOR AN UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 10417

APPLICATION

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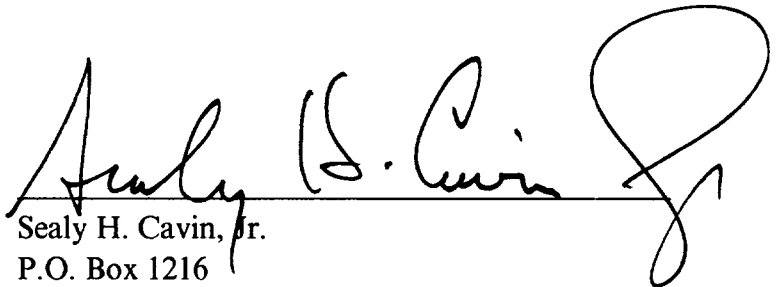
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Respectfully submitted,

STRATTON & CAVIN, P.A.

By:

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Sealy H. Cavin, Jr.

P.O. Box 1216

Albuquerque, New Mexico 87103-1216

Telephone: (505) 243-5400

Attorneys for Coquina Oil Corporation

Stratton & Cavin, P.A.

Attorneys & Counselors at Law

Harold D. Stratton, Jr.
Sealy H. Cavin, Jr.

320 Gold Avenue, S.W.
Suite 918
P.O. Box 1216
Albuquerque, New Mexico 87103-1216

Telephone: 505/243-5400
Facsimile: 505/243-1700

December 3, 1991

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

VIA FAX

Mr. William J. LeMay
Conservation Division
State of New Mexico
P.O. Box 2088
Land Office Building
504-2088

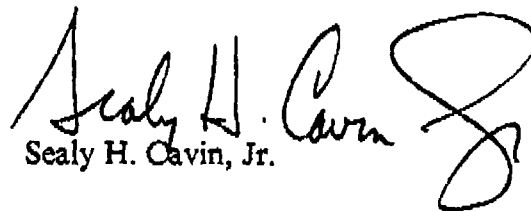
**Re: Application of Coquina Oil Corporation for Unorthodox Gas Well Location,
Sandoval County, New Mexico -- Case No. 10417**

Dear Mr. LeMay:

This will confirm my telephone conversation with David Catanach of your office wherein I requested that the above-referenced case be continued to the hearing now scheduled for Thursday, December 19, 1991. Pursuant to Rule 1209 of the Division's regulations, we would ask that a statement of the continuance be made on the record of the hearing scheduled for Thursday, December 5, 1991.

Thank you for your consideration.

Very truly yours,


Sealy H. Cavin, Jr.

SHC/jas

cc: Dave Cromwell, Agent, Coquina Oil Corporation
William F. Carr, Esq. (VIA FAX)

Stratton & Cavin, P.A.

Attorneys & Counselors at Law

Harold D. Stratton, Jr.
Sealy H. Cavin, Jr.

320 Gold Avenue, S.W.
Suite 918
P.O. Box 1216
Albuquerque, New Mexico 87103-1216

Telephone: 505/243-5400
Facsimile: 505/243-1700

TO: COMPANY:

ATTENTION:

FAX #:

SUBJECT:

William J. LeMay

827-5741

Sealy H. Cavin

12-3-91

1:15

NUMBER OF PAGES, INCLUDING COVER SHEET:

2

MESSAGE:

Stratton & Cavin, P.A.

Attorneys & Counselors at Law

320 Gold Avenue, S.W.

Suite 918

P.O. Box 1216

Albuquerque, New Mexico 87103-1216

OIL CONSERVATION DIVISION
RECEIVED

DEC 5 1991

Telephone: 505/243-5400

Facsimile: 505/243-1700

Harold D. Stratton, Jr.
Sealy H. Cavin, Jr.

December 3, 1991

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

VIA FAX

Mr. William J. LeMay
Oil Conservation Division
State of New Mexico
P.O. Box 2088
Land Office Building
Santa Fe, NM 87504-2088

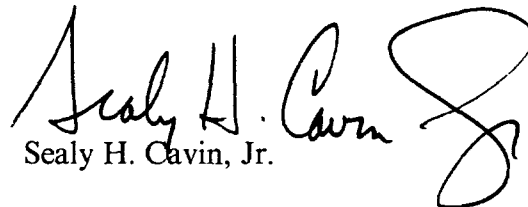
**Re: Application of Coquina Oil Corporation for Unorthodox Gas Well Location,
Eddy County, New Mexico -- Case No. 10417**

Dear Mr. LeMay:

This will confirm my telephone conversation with David Catanach of your office wherein I requested that the above-referenced case be continued to the hearing now scheduled for Thursday, December 19, 1991. Pursuant to Rule 1209 of the Division's regulations, we would ask that a statement of the continuance be made on the record of the hearing scheduled for Thursday, December 5, 1991.

Thank you for your consideration.

Very truly yours,


Sealy H. Cavin, Jr.

SHC/jas

cc: Dave Cromwell, Agent, Coquina Oil Corporation
William F. Carr, Esq. (VIA FAX)

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

APPLICATION OF COQUINA OIL CORPORATION
FOR AN UNORHTODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE NO. 10417

RECEIVED

NOV 27 1991

OIL CONSERVATION DIV.
SANTA FE

PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Coquina Oil Corporation _____

name, address, phone and
contact person

ATTORNEY

Sealy H. Cavin, Jr. _____
Stratton & Cavin, P.A. _____
Post Office Box 1216 _____
Albuquerque, New Mexico 87103 _____

(505) 243-5400 _____

OPPOSITION OR OTHER PARTY

Nearburg Producing Company _____
401 E. Illinois, Suite 300 _____
Midland, Texas 79701 _____
Attn: Mark Nearburg _____

(915) 686-8235 _____
name, address, phone and
contact person

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A. _____
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____

(505) 988-4421 _____

STATEMENT OF CASE

APPLICANT

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Nearburg Producing Company opposes this proposed unorthodox location and will seek dismissal of the application or, in the alternative, imposition of a limitation on the well's ability to produce.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Bob Shelton (Landman)

10 Min.

Approximately 2

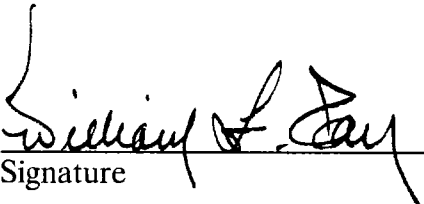
Jerry Elger (Geologist)

10 Min.

Approximately 3

PROCEDURAL MATTERS

None


Signature

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

IN THE MATTER OF THE HEARING
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CONSIDERING:

APPLICATION OF COQUINA OIL CORPORATION
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name, address, phone and
contact person

ATTORNEY

Sealy H. Cavin, Jr. _____
Stratton & Cavin, P.A. _____
Post Office Box 1216 _____
Albuquerque, New Mexico 87103 _____

(505) 243-5400 _____

OPPOSITION OR OTHER PARTY

Nearburg Producing Company _____
401 E. Illinois, Suite 300 _____
Midland, Texas 79701 _____
Attn: Mark Nearburg _____

(915) 686-8235 _____
name, address, phone and
contact person

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____

(505) 988-4421 _____

STATEMENT OF CASE

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(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Bob Shelton (Landman)

10 Min.

Approximately 2

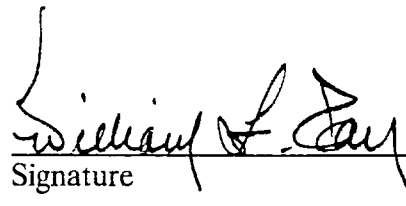
Jerry Elger (Geologist)

10 Min.

Approximately 3

PROCEDURAL MATTERS

None


Signature

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
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DIVISION FOR THE PURPOSE OF
CONSIDERING:

APPLICATION OF COQUINA OIL CORPORATION
FOR AN UNORHTODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE NO. 10417

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OIL CONSERVATION DIV.
SANTA FE

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APPEARANCES OF PARTIES

APPLICANT

Coquina Oil Corporation _____

name, address, phone and
contact person

ATTORNEY

Sealy H. Cavin, Jr. _____
Stratton & Cavin, P.A. _____
Post Office Box 1216 _____
Albuquerque, New Mexico 87103 _____

(505) 243-5400 _____

OPPOSITION OR OTHER PARTY

Nearburg Producing Company _____
401 E. Illinois, Suite 300 _____
Midland, Texas 79701 _____
Attn: Mark Nearburg _____

(915) 686-8235 _____
name, address, phone and
contact person

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____

(505) 988-4421 _____

STATEMENT OF CASE

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OPPOSITION OR OTHER PARTY

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WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Bob Shelton (Landman)

10 Min.

Approximately 2

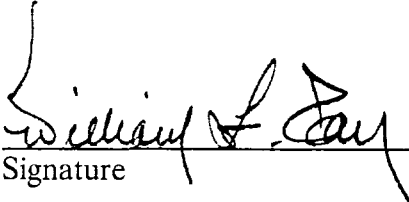
Jerry Elger (Geologist)

10 Min.

Approximately 3

PROCEDURAL MATTERS

None


Signature

Stratton & Cavin, P.A.

Attorneys & Counselors at Law

Harold D. Stratton, Jr.
Sealy H. Cavin, Jr.

320 Gold Avenue, S.W.
Suite 918
P.O. Box 1216
Albuquerque, New Mexico 87103-1216

Telephone: 505/243-5400
Facsimile: 505/243-1700

December 3, 1991

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Mr. William J. LeMay
Oil Conservation Division
State of New Mexico
P.O. Box 2088
Land Office Building
Santa Fe, NM 87504-2088

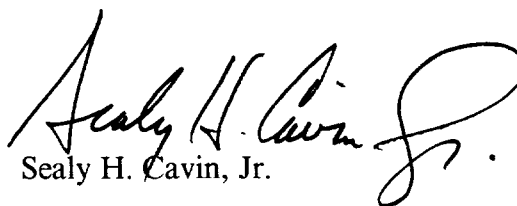
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DEC 9 1991
OIL CONSERVATION DIVISION
OIL CONSERVATION DIVISION

**Re: Pre-Hearing Statement for Application of Coquina Oil Corporation for
Unorthodox Gas Well Location, Eddy County, New Mexico -- Case No. 10417**

Dear Mr. LeMay:

On behalf of Seay Exploration, Inc., I am enclosing an original and two copies of the Pre-Hearing Statement which is filed in connection with the above-referenced case which has been continued to Thursday, December 19, 1991.

Very truly yours,


Sealy H. Cavin, Jr.

SHC/jas

Enclosures

cc: Dave Cromwell, Agent, Coquina Oil Corporation, with Enclosure
William F. Carr, Esq., with Enclosure

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING

CASE NO. 10417

APPLICATION OF COQUINA OIL CORPORATION
FOR AN UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

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NOV 14 1991

PRE-HEARING STATEMENT

OIL CONSERVATION DIVISION

This pre-hearing statement is submitted by Sealy H. Cavin, Jr., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Coquina Oil Corporation
Attention: Dave Cromwell, Agent
407 N. Big Spring, Suite 200
Midland, TX 79701
(915) 682-8319

ATTORNEY

Stratton & Cavin, P.A.
Sealy H. Cavin, Jr.
P.O. Box 1216
Albuquerque, NM 87103-1216
(505) 243-5400

OPPOSITION OR OTHER PARTY

Nearburg Producing Company
401 E. Illinois - Suite 300
Midland, TX 79701
Attention: Mark Nearburg
(915) 686-8235

ATTORNEY

Campbell, Carr, Berge &
Sheridan, P.A.
William F. Carr
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Coquina Oil Corporation seeks approval of an unorthodox gas well location 990 feet from the north and east lines (Unit A) of Section 34, Township 19 South, Range 25 East, the N½ of said Section 34 to be dedicated to said well forming a standard 320-acre gas spacing and proration unit for any and all formations from the surface to the base of the Morrow Formation spaced on 320 acres, which presently includes but is not necessarily limited to the Undesignated Dagger Draw - Strawn Gas Pool, North Cemetery, Atoka Gas Pool and Cemetery - Morrow Gas Pool.

OPPOSITION OR OTHER PARTY

Nearburg Producing Company opposes this proposed unorthodox location and will seek dismissal of the application or, in the alternative, imposition of a limitation on the well's ability to produce.

PROPOSED EVIDENCE

APPLICANT

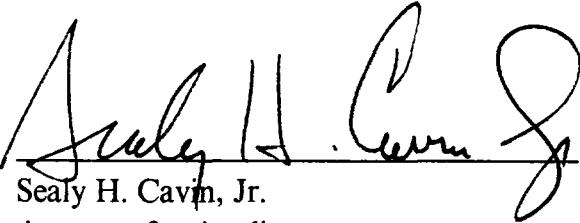
WITNESS	EST. TIME	EXHIBITS
John Seay (Geologist)	10 minutes	Approximately three.
Dave Cromwell (Geologist)	10 minutes	Approximately three.
Tom Waller (Engineer)	10 minutes	Approximately three.

OPPOSITION

WITNESS	EST. TIME	EXHIBITS
Bob Shelton (Landman)	10 minutes	Approximately two.
Jerry Elger (Geologist)	10 minutes	Approximately three.

PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be addressed prior to the hearing.

A handwritten signature in black ink, reading "Sealy H. Cavin, Jr.", written over a horizontal line.

Sealy H. Cavin, Jr.
Attorney for Applicant
Stratton & Cavin, P.A.
P.O. Box 1216
Albuquerque, NM 87103-1216
(505) 243-5400

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

January 28, 1992

Mr. Sealy Cavin
Stratton & Cavin
P. O. Box 1216
Albuquerque, New Mexico 87103

RE: CASE NO. 10417
ORDER NO. R-9635

Dear Sir:

Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.

Sincerely,

A handwritten signature in cursive script that reads "Florene".

Florene Davidson
OC Staff Specialist

FD/sl

cc: BLM Carlsbad Office
William F. Carr

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P. O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

LAND OFFICE BUILDING - 310 Old Santa Fe Trail

Oil Conservation Division
P. O. Box 2088 87504-2088
827-5800

BEFORE THE
OIL CONSERVATION COMMISSION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

RECEIVED

APPLICATION OF COQUINA OIL
CORPORATION FOR AN UNORTHODOX
GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

NOV 27 1991

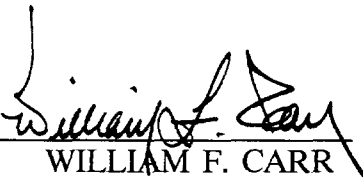
OIL CONSERVATION DIV.
CASE NO. ~~104~~ 117

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby
enters its appearance in the above referenced case on behalf of Nearburg Producing
Company.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.,

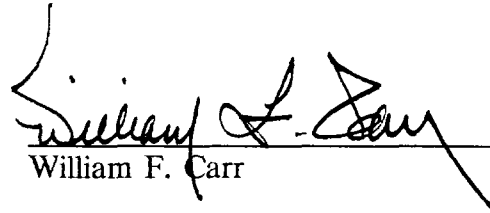
By: 
WILLIAM F. CARR

Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR NEARBURG
PRODUCING COMPANY

CERTIFICATE OF MAILING

I hereby certify that I have caused to be mailed a true and correct copy of the foregoing Entry of Appearance to Sealy H. Cavin, Jr. Esq., (Attorney for Coquina Oil Corporation), Post Office Box 1216, Albuquerque, New Mexico 87103-1216 on this 27th day of November, 1991.


William F. Carr

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

RECEIVED

IN THE MATTER OF THE APPLICATION
OF PRESIDIO EXPLORATION INC., FOR
AN UNORTHODOX GAS WELL LOCATION
AND SIMULTANEOUS DEDICATION,
EDDY COUNTY, NEW MEXICO.

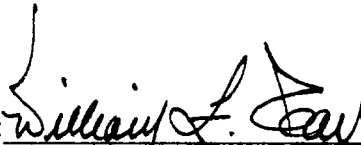
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OIL CONSERVATION DIV.
SANTA FE
CASE NO. 10417

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby
enters its appearance in the above referenced case on behalf of Santa Fe Energy
Operating Partners, L.P.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

By: 

WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR SANTA FE ENERGY
OPERATING PARTNERS, L.P.

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

RECEIVED

IN THE MATTER OF THE APPLICATION
OF PRESIDIO EXPLORATION INC., FOR
AN UNORTHODOX GAS WELL LOCATION
AND SIMULTANEOUS DEDICATION,
EDDY COUNTY, NEW MEXICO.

NOV 27 1991

OIL CONSERVATION DIV.
SANTA FE

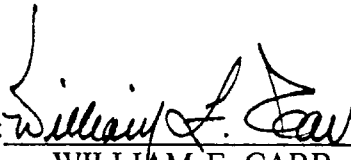
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CASE NO. 10417

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby enters its
appearance in the above referenced case on behalf of Yates Petroleum Corporation.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

By: 

WILLIAM F. CARR

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ATTORNEYS FOR YATES
PETROLEUM CORPORATION