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February 23, 1993

Florene Davidson
Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87503

Dear Florene:

Enclosed for filing are an original and two copies of an application for special pool rules, filed on behalf of Pogo Producing Company. Also enclosed is the proposed advertisement. Please set the case for the March 18, 1993 hearing.

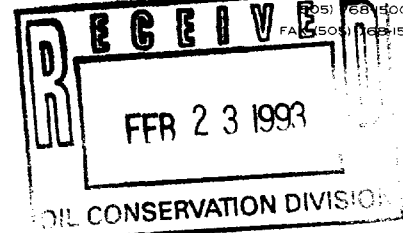
Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

James Bruce
James Bruce

JB:frs
Enclosures

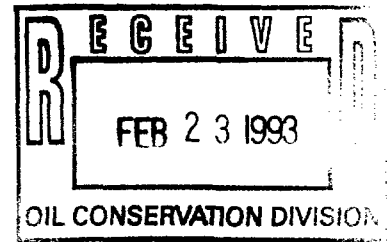
Via Hand Delivery



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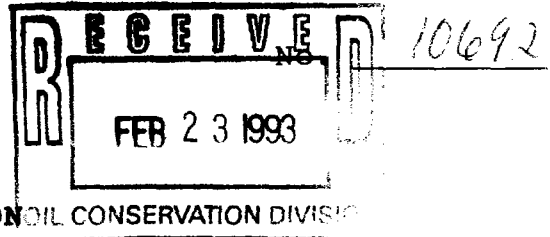
PROPOSED ADVERTISEMENT

Application of Pogo Producing Company for Special Pool Rules for the East Loving-Delaware Pool, Eddy County, New Mexico. Applicant seeks an order providing for a gas:oil ratio of 8,000 cubic feet of gas per barrel of oil produced for the East Loving-Delaware Pool, which covers all or parts of Sections 2, 3, 9, 10, 11, 13, 14, 15, 21, 22, 23, 24, 26, 27, 28, and 34 in Township 23 South, Range 28, East, N.M.P.M.



BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF POGO PRODUCING
COMPANY FOR SPECIAL POOL RULES
FOR THE EAST LOVING-DELAWARE
POOL, EDDY COUNTY, NEW MEXICO.



APPLICATION OIL CONSERVATION DIVISION

Pogo Producing Company hereby applies to the Division for the promulgation of Special Rules and Regulations for the East Loving-Delaware Pool, including a gas:oil ratio of 8,000 cubic feet of gas per barrel of oil produced, and in support thereof states:

1. The East Loving-Delaware Pool (the Pool) was created by Division Order No. R-8562, dated January 1, 1988, and currently includes the following described acreage:

Township 23 South, Range 28 East, N.M.P.M.

Section 2:	SW $\frac{1}{4}$
Section 3:	SE $\frac{1}{4}$ SE $\frac{1}{4}$
Section 9:	SE $\frac{1}{4}$
Section 10:	All
Section 11:	All
Section 13:	SW $\frac{1}{4}$
Section 14:	All
Section 15:	E $\frac{1}{2}$, SW $\frac{1}{4}$
Section 21:	SE $\frac{1}{4}$
Section 22:	All
Section 23:	All
Section 24:	NW $\frac{1}{4}$
Section 26:	NW $\frac{1}{4}$
Section 27:	E $\frac{1}{2}$
Section 28:	NE $\frac{1}{4}$
Section 34:	NE $\frac{1}{4}$

2. Applicant operates wells in the Pool, which are produced under statewide rules which limit production to 142 barrels of oil per day at a gas:oil ratio of 2,000 cubic feet of gas per barrel of oil produced.

3. Applicant seeks the promulgation of Special Rules and Regulations for the Pool to increase the limiting gas:oil ratio to 8,000 cubic feet of gas per barrel of oil produced.

4. An Application for Special Rules and Regulations for the Pool was denied by Order Nos. R-9501 and R-9501-A. However, since the dates of said Orders, additional reservoir data has been obtained which justifies the granting of this application.

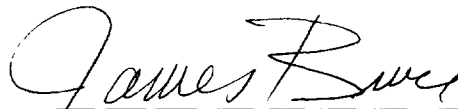
5. Approval of this application will protect the correlative rights of interest owners in the Pool by affording each person the opportunity to produce his just and equitable share of gas and oil from the Pool, will prevent the waste of hydrocarbons, and is otherwise in the best interest of conservation.

WHEREFORE, Applicant requests that this application be set for hearing on March 18, 1993 and, after notice and hearing as required by law, the Division enter its Order approving this application.

Dated: February 23, 1993.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY



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Attorneys for Pogo Producing Company