

CAMPBELL, BYRD & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
HARL D. BYRD
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
KEMP W. GORTHEY
J. SCOTT HALL
PETER N. IVES

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87501
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

July 19, 1984

RECEIVED

JUL 19 1984

Mr. Joe D. Ramey
Director, Oil Conservation Division
New Mexico Department of Energy and Minerals
P.O. Box 2088
Santa Fe, New Mexico 87501

OIL CONSERVATION DIVISION

Re: Case 8275: Application of Robert E. Landreth for
Compulsory Pooling and Unorthodox Location,
Lea County, New Mexico

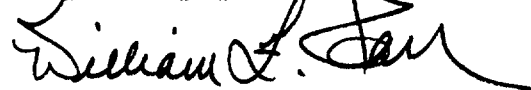
Dear Mr. Ramey:

We represent HNG Oil Company and Enserch Exploration, Inc.
in opposition to the above-referenced application.

This letter is to advise you that a written application has
not been filed in this matter by Robert E. Landreth and
therefore, pursuant to Oil Conservation Division Rule 1203, this
case must be dismissed.

By copy of this letter, we are advising Mr. Landreth of our
Motion to Dismiss this case.

Very truly yours,



William F. Carr

WFC/bp
Enc.

cc: Robert E. Landreth
505 N. Big Springs Energy Square
Suite 507
Midland, TX 79701

Robert E. Landreth

PETROLEUM ENGINEER
OIL AND GAS EXPLORATION

ENERGY SQUARE, SUITE 507

505 N. BIG SPRING

MIDLAND, TEXAS 79701

(915) 684-4711

May 19, 1984

New Mexico Oil Conservation Commission
P.O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mrs. Florene Davidson

Case 8.275

RE: Proposed Page 3 Federal Com #1
15,400' Morrow Test
660' FNL & 660' FWL
Section 3, T-25-S, R-34-E,
Lea County, New Mexico

Gentlemen:

Per our telephone conversation of June 18, 1984, I respectfully request that a hearing be scheduled for July 11, 1984 to consider a request for compulsory pooling of all mineral interests under the captioned land for the drilling of the proposed well on a 320-acre spacing unit encompassing the north half of Section 3. The formations to be pooled are Morrow, Atoka and Strawn.

Since the proposed location is an unorthodox location, we will also request approval of the proposed location at the hearing.

Copies of this application are being furnished to the offset operators listed below. Those parties represented in the north half of Section 3 have already been furnished with a proposal for the drilling of the well as well as notification of our intent to schedule the requested hearing.

Yours very truly,

Robert E. Landreth /bx

Robert E. Landreth

Parties to Compulsory Pooling:

HNG Oil Company
P.O. Box 2267
Midland, Texas 79702

Enserch Exploration, Inc.
P.O. Box 4815
Midland, Texas 79702

Samedan Oil Corporation
Suite 320 Paragon Building
600 N. Marienfeld
Midland, Texas 79701

Offset Operators:

HNG Oil Company
P.O. Box 2267
Midland, Texas 79702

Dob Landreth 6/18/87

915 684-4781

July 11, 1984

Memo

From

FLORENE DAVIDSON

Staff Specialist

To

Robert E. Landreth

Compulsory Pooling and
Unorthodox Location

Morrow, Atoka, and
Strawn formations

N1/2 3-255-34E

Lea County

6601 N + W Section 3

To Mrs. Florene Davidson
New Mexico Oil Conservation Commission
P.O. Box 2088
Santa Fe, New Mexico 87501

From Robert E. Landreth
ENERGY SQUARE, SUITE 507
505 N. BIG SPRING
MIDLAND, TEXAS 79701

Subject Application for Hearing - Proposed Page 3 Federal Com #1 - Section 3, T-25-S, R-34-E,
Lea County, New Mexico (2nd COPY)

NO. 45 TO FOLD

MESSAGE

Dear Florene:

Per our telephone conversation this morning, enclosed please find copy of our application for hearing which was ultimately scheduled for July 25, 1984 (our letter to you dated May 19, 1984). You advised that you never received our letter. Please postpone the hearing date until August 8, 1984 and be advised that we have notified HNG Oil Company, Enserch and Samedan of the change.

Date 7-23-84

Signed

Betsy Jellogg
Betsy Jellogg

REPLY

Date

Signed

Wilson Jones

GRAYLINE FORM 44-902, 3-PART
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RECIPIENT—RETAIN WHITE COPY. RETURN PINK COPY

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CAMPBELL, BYRD & BLACK, P.A.

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LOURDES A. MARTINEZ

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SANTA FE, NEW MEXICO 87501
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

August 3, 1984

HAND DELIVERED

Mr. Joe D. Ramey, Director
Oil Conservation Division
New Mexico Department of Energy
and Minerals
Post Office Box 2088
Santa Fe, New Mexico 87501

RECEIVED
AUG 3 1984
OIL CONSERVATION DIVISION

Re: Application of HNG Oil Company for Compulsory Pooling,
Lea County, New Mexico.

Dear Mr. Ramey:

On August 2, we filed an application for HNG Oil Company seeking an order pooling all mineral interests in the N/2 of Section 3, Township 25 South, Range 34 East, N.M.P.M., Lea County, New Mexico. HNG requested that this matter be set for hearing before the full Oil Conservation Commission on September 20, 1984.

As you will note, this application covers the same acreage which is the subject of Case 8275 in which Robert E. Landreth seeks the pooling of the subject acreage and his designation as operator of the unit. Mr. Landreth's application will be opposed by HNG, Enserch Exploration, Inc. and Samedan Oil Corporation. It therefore would avoid an unnecessary examiner hearing if Case 8275 was continued and consolidated for hearing before the full Commission on September 20.

All lands in the N/2 of Section 3 are HBP and, therefore, no one would be faced with a lease expiration as a result of this continuance.

The last time HNG heard anything about this matter was when Mr. Landreth advised them that he was reconsidering a prior decision not to proceed with the case. HNG learned of his

Mr. Joe D. Ramey
August 3, 1984
Page Two

intention to go forward with the case when it received the docket and cannot be prepared to go forward on August 8. If the case is not continued, we will have no choice but to request a hearing de novo as soon as an order is entered.

We therefore believe that continuing the case will result in getting this matter finally resolved at the earliest possible date.

By copy of this letter, I am advising Mr. Landreth of this request for continuance and would ask that a ruling on this request be made prior to August 8 so that unnecessary trips to Santa Fe can be avoided.

Your attention to this matter is appreciated.

Very truly yours,

A handwritten signature in dark ink, appearing to read "William F. Carr", with a long, sweeping horizontal line extending to the right.

William F. Carr
Attorney for HNG Oil
Company

WFC/cv

cc: Mr. Bill Lewis
Mr. Robert E. Landreth
(Certified Mail-Return Receipt Requested)

LAW OFFICES

LOSEE, CARSON & DICKERSON, P. A.

A. J. LOSEE
JOEL M. CARSON
CHAD DICKERSON
DAVID R. VANDIVER
ELIZABETH LOSEE
REBECCA DICKERSON

300 AMERICAN HOME BUILDING
P. O. DRAWER 239
ARTESIA, NEW MEXICO 88211-0239

AREA CODE 505
746-3508

August 31, 1984

OIL CONSERVATION DIVISION

RECEIVED

Energy and Minerals Department
Oil Conservation Commission
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Case No. 8275
Robert E. Landreth
9/20/84 Commission Hearing

Gentlemen:

Please dismiss the Application of Robert E. Landreth for compulsory pooling of N/2 Section 3, Township 25 South, Range 34 East, N.M.P.M., Lea County, New Mexico, and an unorthodox location.

Thank you.

Sincerely yours,

LOSEE, CARSON & DICKERSON, P.A.



Chad Dickerson

CD:pvm

cc: Mr. Robert E. Landreth
Mr. William F. Carr



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

October 5, 1984

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Mr. Chad Dickerson
Losee, Carson & Dickerson
Attorneys at Law
P. O. Drawer 239
Artesia, New Mexico 88211-0239

Re: CASE NO. 8275
ORDER NO. R-7675

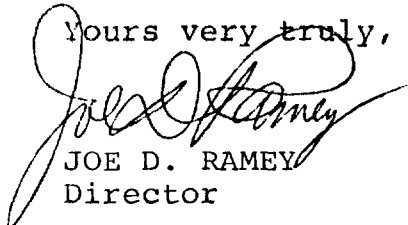
Applicant:

Robert E. Landreth

Dear Sir:

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

Yours very truly,


JOE D. RAMEY
Director

JDR/fd

Copy of order also sent to:

Hobbs OCD x
Artesia OCD x
Aztec OCD

Other William F. Carr