Jason Kellahin W. Thomas Kellahin Karen Aubrey KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

## RECEIVED

February 24, 1986

FER S men

OIL COMSERVATION DIVISION

Mr. Richard L. Stamets Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

"Hand Delivered" 8860

Pennzoil Company Re: Unorthodox Well Location Shipp-Strawn Oil Pool

Dear Mr. Stamets:

Please set the enclosed application for hearing on the next available examiner docket now scheduled for hearing on March 19, 1986.

Very truly yours, Thomas Kellahin

WTK:ca Enc.

cc: Greg Davis Pennzoil Company P. O. Box 1828 Midland, Texas 79701

## STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

FED 1 100

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF PENNZOIL COMPANY FOR APPROVAL OF AN UNORTHODOX WELL LOCATION, LEA COUNTY, NEW MEXICO.

CASE: 5560

## APPLICATION

Comes now PENNZOIL COMPANY, by and through its attorneys, KELLAHIN & KELLAHIN, and applies to the New Mexico Oil Conservation Division for approval of an unorthodox oil well location in the Shipp Strawn Pool for its Simmons Estate Well #1 to be located 1310 feet FSL and 1980 feet FWL of Section 3, T17S, R37E, NMPM, and in support thereof would show:

 Applicant has the right to drill and develop the E/2SW/4 of Section 3, T17S, R37E, NMPM, Lea County, New Mexico.

2. Applicant proposes to drill its Simmons Estate Well #1 in the Shipp-Strawn Pool at a location 1310 feet FSL and 1980 feet FWL of said section.

3. Rule 4 of the Special Rules for the subject pool (Order R-8062-a) provides that standard well locations shall be within 150 feet of the center of a quarterquarter section. 4. The subject well requires an exception to Rule 4 of the Special Rules of the pool in order to be at the optimum location to test the Shipp Strawn Pool in the E/2SW/4 of said section.

5. The well is in the SE/4SW/4 of said section and is located approximately ten feet from the north boundary of that forty-acre tract.

6. The direction of encroachment is towards the center of the spacing unit to be dedicated to the well and Pennzoil Company is the operator of all affected acreage.

7. The only affected operator to whom notice is required by the rules of the Division would be Pennzoil Company.

WHEREFORE, applicant seeks approval of the application as requested.

Kellahin & Kellahin

W. Thomas<sup>®</sup>Kellahin P. O. Box 2265 Santa Fe, NM 87504