

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

RECEIVED OGD

2014 NOV 18 P 3:34

November 18, 2014

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Case 1524<sup>7</sup><sub>10</sub>

Dear Florene:

Enclosed for filing, on behalf of Mack Energy Corporation, are an original and one copy of an application for compulsory pooling, together with a proposed advertisement. Please set this matter for the December 18, 2014 Examiner hearing.

Very truly yours,



James Bruce

Attorney for Mack Energy Corporation

Parties Being Notified

Anadarko E&P Company, LP  
P.O. Box 1330  
Houston, Texas 77251

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

RECEIVED OOD

APPLICATION OF MACK ENERGY

CORPORATION FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO. 2014 NOV 18 P 3: 34

POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 152416<sup>7</sup>

APPLICATION

Mack Energy Corporation applies for an order pooling all mineral interests from the surface to the base of the Bone Spring formation underlying the NE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 34, Township 22 South, Range 27 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

1. Applicant is an operator in the NE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 34, and has the right to drill a well thereon.
2. Applicant proposes to drill its Warren Fee Well No. 1, to a depth sufficient to test the Bone Spring formation, at a surface location 875 feet from the north line and 2045 feet from the west line, to an orthodox bottomhole location 965 feet from the north line and 2285 feet from the west line, of Section 34, and dedicate the NE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 34 to the well to form a standard 40 acre oil spacing and proration unit for any formations and/or pools developed on 40 acre spacing in that vertical extent.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the NE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 34 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests.

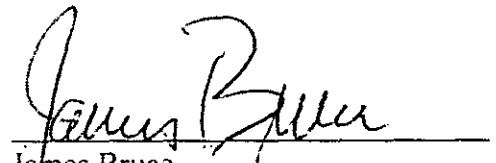
Therefore, applicant seeks an order pooling all mineral interest owners in the NE¼NW¼ of Section 34, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the NE¼NW¼ of Section 34 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

**WHEREFORE**, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interests in the NE¼NW¼ of Section 34 from the surface to the base of the Bone Spring formation;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling the well, and allocating the cost among the well's working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. Setting a 200% charge for the risk involved in drilling the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Mack Energy Corporation

PROPOSED ADVERTISEMENT

Case No. <sup>7</sup>15246:

***Application of Mack Energy Corporation for compulsory pooling, Eddy County, New Mexico.***

Mack Energy Corporation seeks an order pooling all mineral interests from the surface to the base of the Bone Spring formation underlying the NE/4NW/4 of Section 34, Township 22 South, Range 27 East, N.M.P.M., to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The unit will be dedicated to the Warren Fee Well No. 1, to be drilled from a surface location 875 feet from the north line and 2045 feet from the west line, to an orthodox bottomhole location 965 feet from the north line and 2285 feet from the west line, of Section 34. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 1/2 mile northwest of Otis, New Mexico.

RECEIVED OGD  
2014 NOV 18 P 3:34