JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 <sup>+</sup> SANTA FE, NEW MEXICO 87504

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

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

iamesbruc@aol.com

March 10, 2015

RECEIVED OCD

2015 MAR 10 A 9:56

Case 15284

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

Dear Florene:

Enclosed for filing, on behalf of Linn Operating, Inc., is an application to amend Commission Order No. R-11980-A, regarding the East Hobbs San Andres Unit, together with a proposed advertisement. I will mail the originals. Please set this matter for the April 9, 2015 Commission hearing.

Notice requirements for this application are uncertain at this point. Parties who will possibly be notified are on the attached list.

Thank you.

Very truly yours,

Attorney for Linn Operating, Inc.

City of Hobbs

Commissioner of Public Lands

Oil Conservation Division Hobbs Office

# BEFORE THE NEW MEXICO OIL CONSERVATION COMMSISION

2015 HAR 10 A 9:56

### APPLICATION OF LINN OPERATING, INC. TO AMEND COMMISSION ORDER NO. R-11980-A REGARDING THE EAST HOBBS SAN ANDRES UNIT, LEA COUNTY, NEW MEXICO.

1.5284 Case No.

#### **APPLICATION**

Linn Operating, Inc. applies for an order amending Commission Order No. R-11980-A (the "Order"), and in support thereof, states:

1. The East Hobbs San Andres Unit (the "Unit"), a statutory unit, was approved by the Commission for the purpose of instituting a pressure maintenance project within the East Hobbs-San Andres Pool (the "Pool"). The following acreage is in the Unit:

Township 18 South, Range 39 East, N.M.P.M.Section 29:SW/4 and SW/4NW/4Section 30:S/2 and S/2N/2Section 31:N/2N/2Section 32:N/2NW/4

2. Applicant is the operator of the Unit.

3. The Order, in Ordering Paragraph 9, required that no fresh water be used as makeup water or otherwise be injected.

4. Applicant intends to institute a carbon dioxide flood in the Unit at a future date. However, to do so it needs to re-pressurize or fill up the reservoir for several years. The best and possibly only source of make-up water with which to re-pressurize or fill up the reservoir is fresh water from the City of Hobbs water system.

5. As a result, applicant requests that the Order be amended by eliminating Ordering Paragraph 9. 6. The granting of this application is in the interests of conservation, the prevention of waste, and the protection of correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Commission grant the relief requested above.

Respectfully submitted,

114 1115

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

Attorney for Linn Operating; Inc. .

#### PROPOSED ADVERTISEMENT

## Case No. <u>15284</u> :

Application of Linn Operating, Inc. to Amend Commission Order No. R-11980-A regarding the East Hobbs San Andres Unit, Lea County, New Mexico. Commission Order No. R-11980-A approved the East Hobbs San Andres Unit, a statutory unit, for the purpose of instituting a pressure maintenance project within the East Hobbs-San Andres Pool. Applicant seeks an order amending Order No. R-11980-A to eliminate Ordering Paragraph 9, which required that no fresh water be used as make-up water or otherwise be injected. Applicant intends to institute a carbon dioxide flood in the unit at a future date, but to do so needs to re-pressurize or fill up the reservoir, and the best and possibly only way to do so is to use fresh water from the City of Hobbs water system. The unit covers portions of Sections 29-32, Township 18 South, Range 39 East, NMPM. The unit is centered approximately 2 miles northeast of Hobbs, New Mexico.

2015 MAR 1.0

A 9:58