KELLAHIN & KELLAHIN Attorney at Law

W. Thomas Kellahin

Recognized Specialist in the Area of Natural Resources-oil and gas law-New Mexico Board of Legal Specialization P.O. Box 2265
Santa Fe, New Mexico 87504
117 North Guadalupe
Santa Fe, New Mexico 87501

Telephone 505-982-4285 Facsimile 505-982-2047 kellahin@earthlink.net

January 23, 2006

HAND DELIVERED

Mr. Mark E. Fesmire, Director Oil Conservation Division 1220 South Saint Francis Drive Santa Fe, New Mexico 87505 Case 13648

2006 JIN 23 PM 4 (

Re:

Application of Lance Oil & Gas Company, Inc. for compulsory pooling,
San Juan County, New Mexico

Ropco "18" Well No. 1

Unit H of Section 18, T29N R14W API#30-045-32968
Dedications NE/4 PC & E/2 FC

Dear Mr. Fesmire:

On behalf of Lance Oil & Gas Company, Inc., find enclosed our referenced application which we request be set for hearing on the Examiner's docket now scheduled for March 2, 2006. Also enclosed is our proposed advertisement of this case for the NMOCD docket.

. Thomas Kellahin

cc:

Lance Oil & Gas Company, Inc.
Attn: Anne Jones

CASE 36 18 Application of Lance Oil & Gas Company, Inc. for compulsory pooling, San Juan County, New Mexico. Applicant seeks an order pooling all mineral interests to the Pictured Cliffs formation and the Basin Fruitland Coal-Gas Pool underlying both the NE/4 and the E/2 of Section 18, T29N, R14W, NMPM, San Juan County, New Mexico, forming a standard 320acre gas spacing and proration unit for any production from the Basin Fruitland Coal Gas Pool and forming a standard 160-acre gas spacing and proration unit for any production from the Pictured Cliffs formation, including but not limited to the Twin Mounds-Pictured Cliffs Gas Pool. These units are to be dedicated its Ropco "18" Well No. 1 (API# 30-045-32968) to be drilled at a standard gas well location in Unit H of this section. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of Lance Oil & Gas Company, Inc. as the operator of the well and a 200% charge for risk involved in this well. This unit is located approximately 3/4 miles southeast from Kirtland, New Mexico.

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF LANCE OIL & GAS COMPANY, INC. FOR COMPULSORY POOLING, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 13648

APPLICATION

Lance Oil & Gas Company, Inc. ("Lance") by its attorneys, Kellahin & Kellahin, and in accordance with Section 70-2-17.C NMSA (1978) seeks compulsory pooling, San Juan County, New Mexico. Applicant seeks an order pooling all mineral interests to the Pictured Cliffs formation and the Basin Fruitland Coal-Gas Pool underlying both the NE/4 and the E/2 of Section 18, T29N, R14W, NMPM, San Juan County, New Mexico, forming a standard 320-acre gas spacing and proration unit for any production from the Basin Fruitland Coal Gas Pool and forming a standard 160-acre gas spacing and proration unit for any production from the Pictured Cliffs formation, including but not limited to the Twin Mounds-Pictured Cliffs Gas Pool. These units are to be dedicated its Ropco "18" Well No. 1 (API# 30-045-32968) to be drilled at a standard gas well location in Unit H of this section. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of Lance Oil & Gas Company, Inc. as the operator of the well and a 200% charge for risk involved in this well.

In support of its application, Lance Oil & Gas Company, Inc. ("Lance") states:

1.Effective October 1, 2004, Lance became the successor to Richardson Operating Company ("Richardson").

- 2. Lance has a working interest ownership in the oil and gas minerals from the surface to the base of the Pictured Cliffs formation underlying the NE/4 and E/2 of Section 18, T29N, R14N, NMPM, San Juan County, New Mexico.
- 3. These gas spacing units are located within the boundaries of the Basin Fruitland Coal Gas Pool and the Twin Mounds-Pictured Cliffs Gas Pool.
- 4. By letter dated November 15, 2005, Lance offered to lease the interests of all mineral owners within these spacing units.
- 5. By letter dated January 6, 2006, Lance proposed to the other working interest or mineral owners that these wells be drilled and downhole commingled in the Pictured Cliffs and Fruitland coalbed formations to be dedicated to a standard 320-acre gas spacing and proration unit consisting of the E/2 and a standard 160-acre gas spacing and proration unit consisting of the NE/4 all in Section 18.
- 6. Despite its reasonable efforts, application has been unable to obtain a written voluntary agreement from certain uncommitted working interest and/or mineral interest owners as shown on **Exhibit "A"**.
- 7. Pursuant to Section 70-2-17.C NMSA (1978) and in order to obtain its just and equitable share of potential production underlying this spacing unit, Lance needs an order of the Division pooling the interest identified above in order to protect correlative rights and prevent waste.
- 8. Applicant, in the absence of timely objection, will present its evidence by affidavit as provided by Division Rule 1207.A(1) and request the 200% risk charge in accordance with Commission Order R-11992, effective August 15, 2003.
- 9. In accordance with the Division's notice requirements, a copy of this application has been sent to the parties whose interest is to be pooled as listed on Exhibit "A" notifying each of this case and of the applicant's request for a hearing of this matter before the Division on the next available Examiner's docket now scheduled for March 2, 2006.

WHEREFORE, Lance Oil & Gas Company, Inc, as applicant, requests that this application be set for hearing on March 2, 2006 before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described in the appropriate spacing unit for this well at a standard well location upon terms and conditions which include:

- (1) Lance Oil & Gas Company, Inc. be named operator.
- (2) Provisions for applicant and all working interest owners to participate in the costs of drilling, completing, equipping and operating these wells;
- (3) In the event a mineral interest or working interest owner fails to elect to participate, then provision be made to recover out of production, the costs of the drilling, completing, equipping and operating the well, including a risk factor penalty of 200%;
- (4) Provision for overhead rates per month drilling and per month operating and a provision providing for an adjustment method of the overhead rates as provided by COPAS;

(5) For such other and further relief as may be proper.

RESPECTIVILLY SUBMITTED

W. THOMAS KELLAHIN KELLAHIN & KELLAHIN

P. O. Box 2265

Santa Fe, New Mexico 87504

Telephone:

(505) 982-4285

Fax:

(505) 982-2047

EXHIBIT "A"

Madge Manning

(Address Unknown)

Jerome Francis Scezney, PR For Estate of Dora Ella Hunt (Address Unknown)

Edmund J. Goodwin

(Address Unknown)

Charlie Johnson P. O. Box 2664 Kirtland, NM 87417

Glen D. Johnson c/o Charlie Johnson P. O. Box 2664 Kirtland, NM 87417

Karen Hollingsworth 6 CR 6317 Kirtland, NM 87415

Richard M. Hatch & Nina L. Hatch P. O. Box 57 Fruitland, NM 87415

Glen Hoyle & Bonita Hoyle 415 CR 6100 Kirtland, NM 87417