

✓
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)

jamesbruce@aol.com

RECEIVED
2016 OCT 13 P 4:55

October 13, 2016

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

Dear Florene:

Enclosed for filing, on behalf of GMT Exploration Company LLC, are an application to re-open Case No. 15394 for compulsory pooling, *etc.*, together with a proposed advertisement. Please set the application for the November 17, 2016 Examiner hearing. Thank you.

Very truly yours,


James Bruce

Attorney for GMT Exploration Company LLC

Parties Being Pooled

OXY USA Inc.
Suite 110
5 Greenway Plaza
Houston, Texas 77046

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF GMT EXPLORATION COMPANY LLC
TO RE-OPEN CASE NO. 15394 FOR A NON-STANDARD
OIL SPACING AND PRORATION UNIT AND COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case No. 15394 (Re-opened)

APPLICATION

GMT Exploration Company LLC applies for an order (i) approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W½W½ of Section 22, Township 24 South, Range 34 East, N.M.P.M., Lea County, New Mexico, and (ii) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

1. Applicant is an interest owner in the W½W½ of Section 22, and has the right to drill a well thereon.

2. Applicant proposes to drill its Romeo Fed. Com. Well No. 1H to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the W½W½ of Section 22 to the well to form a non-standard 160 acre oil spacing and proration unit (project area) in the Bone Spring formation. The well is a horizontal well, with a surface location 400 feet from the north line and 330 feet from the west line, and a final take point 330 feet from the south line and 330 feet from the west line, of Section 22. This is a change in location from what was specified in Order No. R-14075 entered in Case 15394.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the W½W½ of Section 22 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 $W\frac{1}{2}W\frac{1}{2}$ of Section 22, pursuant to NMSA 1978 §§70-2-17, 18.

5. Approval of the non-standard unit and the pooling of all mineral interests underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 22 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. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the $W\frac{1}{2}W\frac{1}{2}$ of Section 22;
- B. Pooling all mineral interests in the Bone Spring formation underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 22;
- C. Designating applicant as operator of the well;
- D. Extending the time to commence the proposed well to November 30, 2017.
- E. Considering the cost of drilling and completing the well, and allocating the cost thereof among the well's working interest owners;
- F. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- G. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

A handwritten signature in cursive script that reads "James Bruce". The signature is written in dark ink and is positioned above a horizontal line.

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

jamesbruc@aol.com

Attorney for GMT Exploration Company
LLC

PROPOSED ADVERTISEMENT

Case No 15394 (re-opened):

Application of GMT Exploration Company LLC to Re-open Case No. 15394 for a non-standard oil spacing and proration unit and compulsory pooling, Lea County, New Mexico. GMT Exploration Company LLC seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 22, Township 24 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit (project area). The unit will be dedicated to the Romeo Fed. Com. Well No. 1H, a horizontal well with a surface location in the NW/NW/4, and a terminus in the SW/4SW/4, of Section 22. The beginning and end of the productive interval will be orthodox. 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 17 miles west-northwest of Jal, New Mexico.

RECEIVED
2016 OCT 13 P 1:27