

AUG 07 2018 PM03:09

**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)

August 7, 2018

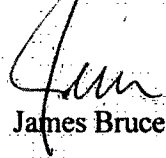
*Case 16383*

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

Dear Florene:

Enclosed for filing, on behalf of Energen Resources Corporation, are an application for compulsory pooling, together with a proposed advertisement. Please set the application for the September 6, 2018 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Mewbourne Oil Company

**Parties Notified**

**ExxonMobil Corporation**

**COG Operating LLC**

**Devon Energy Production Company, L.P.**

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

**APPLICATION OF ENERGEN REOURCES  
CORPORATION FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

Case No. 16383

**APPLICATION**

Energen Resources Corporation applies for an order pooling all mineral interests in the Bone Spring formation underlying the W/2W/2 of Section 15 and the W/2W/2 of Section 10, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the W/2W/2 of Section 15 and the W/2W/2 of Section 10, and has the right to drill a well thereon.
2. Applicant proposes to drill its Brahman State Com. 15-10 Well No. 452H to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the W/2W/2 of Section 15 and the W/2W/2 of Section 10 to the well to form a 320 acre horizontal spacing unit in the Bone Spring formation. The well is a horizontal well, with a surface location in the SE/4SW/4 of Section 15, a first take point in the SW/4SW/4 of Section 15, and a final take point in the NW/4NW/4 of Section 10.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the Bone Spring formation in the W/2W/2 of Section 15 and the W/2W/2 of Section 10 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.

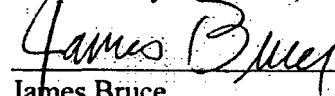
Therefore, applicant seeks an order pooling all mineral interest owners in the Bone Spring formation in the W/2W/2 of Section 15 and the W/2W/2 of Section 10, pursuant to NMSA 1978 §§70-2-17.

5. The pooling of all mineral interests in the Bone Spring formation underlying the W/2W/2 of Section 15 and the W/2W/2 of Section 10 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 Bone Spring formation underlying the W/2W/2 of Section 15 and the W/2W/2 of Section 10;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing 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 and completing 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 Energen Resources Corporation

PROPOSED ADVERTISEMENT

Case No. 16383:

***Application of Energen Resources Corporation for compulsory pooling, Lea County, New Mexico.*** Energen Resources Corporation seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 15 and the W/2W/2 of Section 10, Township 24 South, Range 35 East, NMPM. The unit will be dedicated to the Brahman State Com. 15-10 Com. Well No. 452H, a horizontal well with a surface location in the SE/4SW/4 of Section 15, a first take point in the SW/4SW/4 of Section 15, and a final take point in the NW/4NW/4 of Section 10. 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 12 miles northwest of Jal, New Mexico.