CAMPBELL AND BLACK, P.A.

LAWYERS

15. O. M.

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAN PBELL WILLIAM F. CARR

CELVED 0.12

OIL CONSERVATION DIVISION SANTA EEST OFFICT BOX 2208 JEFFERSON PLACE SANTA FE, NEW MEXICO 87501 TELEPHONE (505) 988-4421

April 28, 1980

HAND DELIVERED

Mr. Joe D. Ramey Division Director Oil Conservation Division New Mexico Department of Energy & Minerals Post Office Box 2088 Santa Fe, New Mexico 87501

Application of Supron Energy Corporation for Compulsory Pooling and a Dual Completion, San Juan County, New Mexico Re :

Dear Mr. Ramey:

Enclosed in triplicate is the application of Supron Energy Corporation in the above-referenced matter.

The applicant requests that this matter be included on the docket for the examiner hearing to be held on May 7, 1980.

Very truly yours, A. Car

William F. Carr

WFC:lr

Enclosures

cc: Mr. William S. Jameson

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE APPLICATION OF SUPRON ENERGY CORPORATION FOR COMPULSORY POOLING AND A DUAL COMPLETION, SAN JUAN COUNTY, NEW MEXICO.

Case No. 6884

SANTA FE

ANALICA DIVISION

APPLICATION

Comes now SUPRON ENERGY CORPORATION, by and through its undersigned attorneys and, as provided by Section 70-2-17, New Mexico Statutes Annotated, 1978 Compilation, hereby makes application for an order pooling all interests in the N/2 of Section 4, Township 30 North, Range 11 West, San Juan County, New Mexico, in the Dakota and Mesaverde formations. Applicant further seeks approval to dually complete a well to be drilled and completed at a standard location on said pooled unit and in support of this application would show:

- 1. Applicant is the owner of 49.46% of the working interest in and under the N/2 of said Section 4 and applicant has the right to drill thereon.
- Applicant proposes to dedicate the above-referenced pooled unit to a well to be drilled at an orthodox location in the NW/4 NE/4 of said Section 4.
- 3. Applicant has sought but been unable to obtain either voluntary agreement for pooling or farmout from the following working interest owners in the N/2 of said Section 4:

a.	Koch Exploration Company Box 2256		
	Wichita, Kansas	67201	37.91% W.I.
b.	Claude R. Lambe 1313 Douglas Bui Wichita, Kansas	lding 67201	12.63% W.I.

- 4. The proposed well will be completed in such a manner as to effectively prevent communication between the two producing horizons and will result in a greater ultimate recovery of hydrocarbons from the two pools.
- Said pooling of interest and well completion will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.
- 6. In order to permit the applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled and applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions designating the applicant as operator of the well, providing for applicant to recover its costs of drilling, equipping and completing the well, the costs of supervision while drilling and after completion, including overhead charges and a risk factor for the risk assumed by the applicant in drilling, completing and equipping the well, and authorizing dual completion of the subject well and making such other and further provisions as may be proper in the premises.

> Respectfully submitted, CAMPBELL AND BLACK, P.A.

By iam F. Carr

Post Office Box 2208 Santa Fe, New Mexico 87501 Attorneys for Applicant.

-2-

- 4. The proposed well will be completed in such a manner as to effectively prevent communication between the two producing horizons and will result in a greater ultimate recovery of hydrocarbons from the two pools.
- Said pooling of interest and well completion will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.
- 6. In order to permit the applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled and applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions designating the applicant as operator of the well, providing for applicant to recover its costs of drilling, equipping and completing the well, the costs of supervision while drilling and after completion, including overhead charges and a risk factor for the risk assumed by the applicant in drilling, completing and equipping the well, and authorizing dual completion of the subject well and making such other and further provisions as may be proper in the premises.

> Respectfully submitted, CAMPBELL AND BLACK, P.A.

By ` Lliam F.

Post Office Box 2208 Santa Fe, New Mexico 87501 Attorneys for Applicant.