

**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)

RECEIVED OGD

2009 OCT -2 P 3: 18

October 2, 2009


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

Re: Case No. 14326/Order No. R-13166

Dear Florene:

Enclosed for filing, on behalf of Nacogdoches Oil and Gas Inc., are an original and five copies of an application for hearing *de novo*, together with a proposed advertisement. The advertisement was previously e-mailed to the Division.

Very truly yours,



James Bruce

Attorney for Nacogdoches Oil and Gas, Inc.

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

2009 OCT -2 P 3: 18  
RECEIVED OOD

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

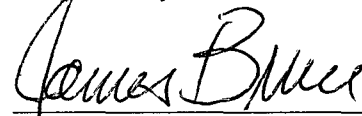
APPLICATION OF THE NEW MEXICO OIL  
CONSERVATION DIVISION FOR A COMPLIANCE  
ORDER AGAINST NACOGDOCHES OIL AND  
GAS, INC.

Case No. 14,326 (*de novo*)  
Order No. R-13,166

APPLICATION FOR HEARING *DE NOVO*

Nacogdoches Oil and Gas, Inc., a party of record adversely affected by the above Order, requests that this matter be heard *de novo* before the Oil Conservation Commission.

Respectfully submitted,



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

Attorney for Nacogdoches Oil and Gas, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy poof the foregoing pleading was served upon the following counsel of record by hand delivery this 2nd day of October, 2009:

Mikal Altomare  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505



James Bruce

PROPOSED ADVERTISEMENT

RECEIVED OCD

**Case No. 14326 (De Novo):**

2009 OCT -2 P 3: 19

**Application of the New Mexico Oil Conservation Division for a compliance order against Nacogdoches Oil and Gas, Inc., McKinley County, New Mexico.** Applicant seeks an order finding that Nacogdoches Oil and Gas, Inc. is in violation of NMAC 19.15.5.9 and 19.15.25.8 as to the 48 wells listed below, and to bring all 48 wells into compliance with Division rules by a date certain. The Division further seeks the authority to forfeit any associated financial assurance, and to plug and abandon the wells if the operator fails to meet the deadline established in the order. The Hospah Sand Unit is centered approximately 20 miles northeast of Crownpoint, New Mexico; the Lone Pine Dakota D Unit is centered approximately 24 miles east of Crownpoint, New Mexico; the Santa Fe Pacific Railroad well is located approximately 21 miles east of Crownpoint, New Mexico; the Santa Fe Railroad wells are located approximately 23 miles east of Crownpoint, New Mexico; the Santa Fe Railroad A wells are located approximately 24 miles east of Crownpoint, New Mexico; the Santa Fe Railroad B wells are located approximately 26 miles east of Crownpoint, New Mexico; and the South Hospah Unit is centered approximately 21 miles east of Crownpoint, New Mexico. Upon the application of Nacogdoches Oil and Gas, Inc., this case will be heard *De Novo* pursuant to the provisions of Division Rule NMAC 19.15.4.23

1. HOSPAH SAND UNIT #038	1. 30-031-05179
2. HOSPAH SAND UNIT #039	2. 30-031-05171
3. HOSPAH SAND UNIT #051	3. 30-031-05194
4. HOSPAH SAND UNIT #058	4. 30-031-20115
5. HOSPAH SAND UNIT #066	5. 30-031-05577
6. HOSPAH SAND UNIT #084	6. 30-031-20248
7. HOSPAH SAND UNIT #092	7. 30-031-20613
8. HOSPAH SAND UNIT #093	8. 30-031-20611
9. HOSPAH SAND UNIT #100	9. 30-031-20831
10. LONE PINE DAKOTA D UNIT #012	10. 30-031-20183
11. LONE PINE DAKOTA D UNIT #014	11. 30-031-20174
12. LONE PINE DAKOTA D UNIT #023	12. 30-031-20201
13. SANTA FE PACIFIC RAILROAD #009	13. 30-031-20182
14. SANTA FE RAILROAD #023	14. 30-031-20150
15. SANTA FE RAILROAD #044	15. 30-031-20713
16. SANTA FE RAILROAD #051	16. 30-031-20853
17. SANTA FE RAILROAD A #074	17. 30-031-20021
18. SANTA FE RAILROAD A #083	18. 30-031-20147
19. SANTA FE RAILROAD A #084	19. 30-031-20372
20. SANTA FE RAILROAD A #087	20. 30-031-20413
21. SANTA FE RAILROAD A #097	21. 30-031-20855
22. SANTA FE RR B #032	22. 30-031-20303
23. SANTA FE RR B #035	23. 30-031-20391
24. SOUTH HOSPAH UNIT #002	24. 30-031-05139
25. SOUTH HOSPAH UNIT #004	25. 30-031-05145

26. SOUTH HOSPAH UNIT #005	26. 30-031-05146
27. SOUTH HOSPAH UNIT #006	27. 30-031-20009
28. SOUTH HOSPAH UNIT #008	28. 30-031-20015
29. SOUTH HOSPAH UNIT #009	29. 30-031-20013
30. SOUTH HOSPAH UNIT #012	30. 30-031-20020
31. SOUTH HOSPAH UNIT #013	31. 30-031-20054
32. SOUTH HOSPAH UNIT #017	32. 30-031-20057
33. SOUTH HOSPAH UNIT #021	33. 30-031-05134
34. SOUTH HOSPAH UNIT #022	34. 30-031-05498
35. SOUTH HOSPAH UNIT #027	35. 30-031-20094
36. SOUTH HOSPAH UNIT #029	36. 30-031-20120
37. SOUTH HOSPAH UNIT #033	37. 30-031-20124
38. SOUTH HOSPAH UNIT #036	38. 30-031-20118
39. SOUTH HOSPAH UNIT #037X	39. 30-031-20135
40. SOUTH HOSPAH UNIT #047	40. 30-031-20361
41. SOUTH HOSPAH UNIT #051	41. 30-031-20242
42. SOUTH HOSPAH UNIT #052	42. 30-031-20243
43. SOUTH HOSPAH UNIT #054	43. 30-031-20407
44. SOUTH HOSPAH UNIT #057	44. 30-031-20408
45. SOUTH HOSPAH UNIT #058	45. 30-031-20409
46. SOUTH HOSPAH UNIT #059	46. 30-031-20410
47. SOUTH HOSPAH UNIT #060	47. 30-031-20411
48. SOUTH HOSPAH UNIT #063	48. 30-031-20544