

April 12, 2011

**HAND-DELIVERED**

Jami Bailey  
Director  
Oil Conservation Division  
New Mexico Energy, Minerals and  
Natural Resources Department  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

*Case 14646*

RECEIVED OOD  
2011 APR 12 P 4:58

Re: Application of Resaca Operating Co. for horizontal contraction of the Langlie Mattix Pool and the vertical extension of the Jalmat Gas Pool within the Cooper Jal Unit, Lea County, New Mexico.

Dear Ms. Bailey:

Enclosed is the application of Resaca Operating Company in the above-referenced case as well as a copy of a legal advertisement. Resaca requests that this matter be placed on the docket for the May 12, 2011 Examiner hearings.

Sincerely,

  
Ocean Munds-Dry

Enclosures

cc: Keith Masters

STATE OF NEW MEXICO RECEIVED OGD  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION 2011 MAR 12 P 4:59

**IN THE MATTER OF THE APPLICATION OF RESACA OPERATING COMPANY TO HORIZONTALLY CONTRACT THE LANGLIE MATTIX POOL AND VERTICALLY EXTEND THE JALMAT GAS POOL WITHIN THE BOUNDARIES OF THE COOPER JAL UNIT, LEA COUNTY, NEW MEXICO.**

CASE NO. 14646

**APPLICATION**

RESACA OPERATING COMPANY, ("Resaca") through its undersigned attorneys, hereby makes application to the Oil Conservation Division for an order contracting the horizontal boundary of the Langlie Mattix Pool and extending the vertical limits of the Jalmat Gas Pool within the Cooper Jal Unit. In support of its application, Resaca states:

1. Resaca is the operator of the Cooper Jal Unit, Lea County, New Mexico which is comprised of 2581 acres, more or less, of federal and fee lands which was approved pursuant to Oil Conservation Division Order No. R-4018 dated August 25, 1970. The Unit boundaries include the following acreage:

**TOWNSHIP 24 SOUTH, RANGE 36 EAST, NMPM**

Section 13:	S/2
Section 14:	SE/4 SE/4
Section 23:	S/2 SE/4
Section 24:	All
Section 25:	N/2
Section 26:	E/2 NE/4

**TOWNSHIP 24 SOUTH, RANGE 37 EAST, NMPM**

Section 18:	All
Section 19:	W/2
Section 30:	NW/4

2. The "Unitized Formation" in the Cooper Jal Unit comprises the interval from the top of Tansill formation to the base of the Queen formation.

3. The Jalmat Gas Pool was created by Division Order No. R-264, dated February 17, 1953. The pool boundaries have been amended from time to time to include, among other lands, all acreage in the Cooper Jal Unit. Within the Cooper Jal Unit, the vertical limits of the Jalmat Gas Pool vary. The Jalmat Gas Pool is defined as the top of the Tansill formation to a point 100 feet above the base of the Seven Rivers formation ( to include all the Yates formation) in the SE/4 SE/4 of Section 14, SW/4 of Section 13 and the SW/4 SE/4 of Section 23, Township 24 South, Range 36 East and the NW/ NW/4, E/2, NE/4, SE/4, E/2 SW/4 of Section 18, Township 24 South, Range 37 East, NMPM. Division Order No. R-640 extended the pool to the top of the Tansill formation to a point 250 feet above the base of the Seven Rivers formation (to include all the Yates formation) in the balance of the Cooper Jal Unit Area.

4. The Langlie-Mattix Pool was created by Division Order No. 850, dated January 1, 1950. The pool boundaries have been amended from time to time to include, among other lands, all acreage in the Cooper Jal Unit. The vertical limits of the Pool extend from a point 100 feet above the base of the Seven Rivers formation to the base of the Queen formation in the SE/4 SE/4 of Section 14, SW/4 of Section 13, S/2 SE/4 of Section 23, NW/4, W/2 SW/4 of Section 24, NW/4 of Section 25 and E/2 NE/4 Section 26, Township 24 South, Range 36 East and the NW/ NW/4, E/2, NE/4, SE/4, E/2 SW/4 of Section 18, Township 24 South, Range 37 East, NMPM. Division Order No. R-640 extended the pool to the top of the Tansill formation to a point 250 feet above the base of the Seven Rivers formation (to include all the Yates formation) to the balance of the Cooper Jal Unit Area.

5. There are producible reserves in the Tansill, Yates, Seven Rivers and Queen formations underlying the Cooper Jal Unit that are still recoverable pursuant to enhanced recovery operations but it is uneconomical to separately produce these pools.

6. Accordingly, although separate secondary recovery projects are recognized for each pool, the Unit is effectively operated as a single waterflood project. Many of the producing wells have been granted authority to downhole commingle production in the Jalmat and Langlie Mattix intervals. Many of the injection wells also inject into both intervals.

7. A vertical expansion of the Jalmat Gas Pool to include the entire unitized formation will allow the efficient recovery of all movable hydrocarbons within the Tansill, Yates, Severn Rivers and Queen formations.

8. In order to avoid waste and protect correlative rights, Resaca respectfully requests the following changes to the current vertical and horizontal boundaries of the subject pools:

A. Contraction of the horizontal limits of the Langlie Mattix Pool to exclude the Unitized Area;

B. Extension of the vertical limits of the Jalmat Gas Pool to include all the Unitized Formation from the top of the Tansill formation to the base of the Queen formation.

9. **Exhibit A** is a list of parties that were notified of this hearing in accordance with Division rules.

10. Approval of this application will afford Resaca the opportunity to produce its just and equitable share of the remaining reserves in the Cooper Jal Unit Area and

will otherwise be in the best interest of conservation, the protection of correlative rights and the prevention of waste.

WHEREFORE, Resaca Operating Company requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 12, 2011 and, after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted,  
HOLLAND & HART LLP

By: Ocean Munds Dry  
Ocean Munds-Dry  
Post Office Box 2208  
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ATTORNEYS FOR RESACA OPERATING CO.

**EXHIBIT A**

**APPLICATION OF  
RESACA OPERATING CO.  
LEA COUNTY, NEW MEXICO.**

**Unit Interest Owners:**

MRS. CONSTANCE B. CARTWRIGHT,  
TRUSTEE  
TRUST OF GEORGE F. BAUERDORF  
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MISSISSIPPI BAPTIST FDN  
PO BOX 530  
JACKSON, MS 39205-0530

MOBIL PRODUCING TEXAS  
PO BOX 951082  
DALLAS, TX 75395-1082

MOBIL PRODUCING TEXAS & NEW  
MEXICO INC  
P O BOX 951027  
DALLAS, TX 75395-1027

MONTGOMERY PETROLEUM INC  
4925 GREENVILLE AVE  
DALLAS, TX 75206

MRS CLYDE W MILLER  
APT 1612  
6500 COCKRELL HILL RD  
DALLAS, TX 75236

MYRTIS D WATKINS ESTATE  
PO BOX 1790  
KILGORE, TX 75663

MYRTLE L DAVIS OIL TRUST  
PO BOX 840738  
DALLAS, TX 75284-0738

NANCY E GUTMAN  
161 REVOLUTIONARY RD  
SCARBOUGH, NY 10510

NANCY P JACK REVOCABLE TRUST  
1311 NW 107TH TERR  
GAINESVILLE, FL 32606-5489

NEWBY FORESEE TRUST  
TX1 1310  
PO BOX 99084  
FORT WORTH, TX 76199-0084

NOMMENSEN INVESTMENT COMPANY  
12411 BROKEN BOUGH  
HOUSTON, TX 77024

ODUS PHILLIPS  
1313 ELM ST APT 15  
CONWAY, AR 72034

OKLAHOMA BAPTIST FOUNDATION  
C/O BAPTIST FOUNDF OF TEXAS  
1601 ELM STE 1700  
DALLAS, TX 75201-7241

ONEZ N ROONEY TEST TRUST  
PO BOX 960031  
OKLAHOMA CITY, OK 73196-0031

PATRICIA A FARRIS  
121 W MICHIGAN AVE  
MILAN, MI 48160-1039

PATRICK L FAIRCHILD  
PO BOX 80432  
MIDLAND, TX 79708

PEGRO & CO LP  
C/O PEGGY CASPER  
45 EAST 89TH ST #35E  
NEW YORK, NY 10128

PHILIP R SNOW  
320 S BOSTON  
STE 1910  
TULSA, OK 74103-4708

PLACER LTD  
PO BOX 8204  
MIDLAND, TX 79708

PLAINS EXPLORATION &  
PRODUCTION CO  
700 MILAM SUITE 3100  
HOUSTON, TX 77002

PURNELL MORROW COMPANY  
1116 ONE ENERGY SQUARE  
4925 GREENVILLE AVE  
DALLAS, TX 75206-4085

R E GUEST OIL PRODUCER  
P O BOX 805  
EDMOND, OK 73083-0805

RANDALL H KERTH  
17422 ASPEN OAK CT  
SPRING, TX 77379

RANDY LEE CONE  
P O BOX 552  
JAY, OK 74346

RHONDA K CHRISTENSEN  
5226 TIMBERHURST  
SAN ANTONIO, TX 78250-4324

RICHARD D LATADY JR  
710 S MOBILE ST UNIT 3  
FAIRHOPE, AL 36532

RICHARD J WINNINGHAM  
5904 GLENDOWER LANE  
PLANO, TX 75093-4780

ROBERT JOE REICHERT  
11101 BLUE STEM BACK RD  
OKLAHOMA CITY, OK 73162-4912

ROBERT L.E. BURRESS  
1317 ESTANCIA AVE  
GRANTS, NM 87020-2321

ROBERT P BYRON  
PO BOX 1562  
ROSWELL, NM 88202-1562

ROBERT S AIKMAN GST EXEMPT TRUST  
11200 TRINDAD  
AMARILLO, TX 79118

ROSIE ELETHA MCCOY  
PO BOX 1772  
VERNON, TX 76384-1772

ROY DEAN CAMPBELL  
C/O GREG & GINA PITTS  
1268 HARTON  
CONWAY, AR 72032

ROYALTY TRUST CORP.  
PO BOX 22577  
HIALEAH, FL 33002-2577

SAM R PETTY  
RT 4 BOX 1460  
CHECOTAH, OK 74426-9803

SANDRA GUTMAN  
P O BOX 86  
COBB, CA 95426-0086

SARA H STOVALL  
APT 2314  
11900 BARRYKNOLL LANE  
HOUSTON, TX 77024

SARITA ENERGY RESOURCES LTD  
C/O GREEN BNK ATTN B DOZIER  
109 N POST OAK LN  
HOUSTON, TX 77024

SELMA ANDREWS PERPETUAL  
CHARITABLE TR  
P O BOX 840738  
DALLAS, TX 75284-0738

SELMA E ANDREWS TR U/A FOR  
PEGGY  
P O BOX 840738  
DALLAS, TX 75284-0738

SELMA MAXINE DUNN  
PO BOX 57103  
WEBSTER, TX 77598

SHARON DUNN RILEY  
9601 PALOMAS AVE NE  
ALBUQUERQUE, NM 87109

SHERRY NEVADA OIL ROYALTY CO  
1919 N TURNER ST  
HOBBS, NM 88240

SILVERADO OIL & GAS LLP  
PO BOX 52308  
TULSA, OK 74152-0308

SPINDLETOP EXPLORATION COMPANY  
INC  
P O BOX 25163  
DALLAS, TX 75225

SUSAN ELISABETH BOWEN  
P O BOX 584  
VERDUGO CITY, CA 91046-0584

SUSAN LAMB GRIFFITH  
1510 BELMONT STREET  
JACKSON, MS 39202-1201

TATE BYRNE JENNINGS  
3535 23RD ST  
BOULDER, CO 80304-1907

THE IS OF TEXAS FAMILY  
PARTNERSHIP LP  
SUITE 525  
12720 HILLCREST RD  
DALLAS, TX 75230

THE LONG TRUSTS  
PO BOX 3096  
118 S KILGORE STREET  
KILGORE, TX 75663

THE TOLES COMPANY  
P O DRAWER 1300  
ROSWELL, NM 88202-1300

THEODORE LOW CO INC  
PO BOX 190  
HOLDENVILLE, OK 74848-0190

THOMAS MARTIN ELLISON  
PO BOX 206  
VOLCANO, CA 95689

THOMAS RAY SIVLEY TRUST  
PO BOX 840738  
DALLAS, TX 75284-0738

THOMAS W TUCKER  
1510 BELMONT ST  
JACKSON, MS 39202-1201

TIM SHEPARD  
920 3RD AVE  
LONGMONT, CO 80501

TOM CONE CHILDRENS TR UWO  
KATHLEEN CONE  
PO BOX 1588  
TULSA, OK 74101-1588

TOM R CONE  
PO BOX 400  
SOUTH WEST CITY, MO 64863

TOM S BURRESS  
6018 KINGSBRIDGE DR  
SAN ANGELO, TX 76901

TRITEX PRODUCTION CO  
STE 117  
2882 SAND HILL RD  
MENLO PARK, CA 94025-7057

VEVA NEVA NELSON  
2000 PARSONS APT 13  
COSTA MESA, CA 92627-2064

VIOLET U COOPER  
REV LIV TR DTD 1 21 93  
368 HEIMBAUGH RD  
MOGADORE, OH 44260-9525

VIRGINIA MITCHELL LEE  
5347 WOODFORD DR  
BIRMINGHAM, AL 35242-4135

VS HOLDING USA LTD  
PMB 419  
4155 DEEP LK BOUNDARY RD  
COLVILLE, WA 99114

WALKER A DUNN JR  
1109 W MISSOURI  
MIDLAND, TX 79701

WANDA ELLISON LIFE ESTATE  
2505 WHISPERING OAKS  
DENTON, TX 76209

WARREN J BATES ESTATE  
PO BOX 369  
ADA, OK 74821

WHITE STAR ENERGY INC  
P. O. BOX 51108  
MIDLAND, TX 79710

WILLIAM C AIKMAN GST EXEMPT  
TRUST  
11200 TRINDAD  
AMARILLO, TX 79118

**Offsets:**

APACHE CORP.  
303 VETERANS AIRPARK LANE,  
STE. 3000  
MIDLAND, TX 79705

BURLESON PETROLEUM, INC.  
P. O. BOX 2479  
MIDLAND, TX 79702

CAMERON OIL & GAS, INC.  
P. O. BOX 1456  
ROSWELL, NM 88202-1456

CIMAREX ENERGY CO. OF  
COLORADO  
600 N. MARIENFELD ST. STE. 600  
MIDLAND, TX 79701

CONOCOPHILLIPS COMPANY  
3401 E. 30TH STREET  
FARMINGTON, NM 87402

ENERVEST OPERATING, LLC  
1001 FANNIN ST., STE. 800  
HOUSTON, TX 77002

ERNMAR INVESTMENTS, INC.  
P. O. BOX 6492  
EDMOND, OK 73083

FULFER OIL & CATTLE, LLC  
P. O. BOX 1224  
JAL, NM 88252

HERMAN L. LOEB, LLC  
600 COUNTRY CLUB DRIVE  
LAWRENCEVILLE, IL 62439

LANEXCO, INC.  
P. O. BOX 2730  
MIDLAND, TX 79702

MCDONNOLD OPERATING, INC.  
505 N. BIG SPRING; STE. 204  
MIDLAND, TX 79701

OXY USA, INC.  
P. O. BOX 4294  
HOUSTON, TX 77210

OXY USA WTP LIMITED  
PARTNERSHIP  
P. O. BOX 4294  
HOUSTON, TX 77210

PRIMAL ENERGY  
CORPORATION  
21021 SPRINGBROOK PLAZA DR.;  
STE. 160  
SPRING, TX 77379

PRIME OPERATING  
CO.  
3300 NORTH A ST.; BLDG. ONE; STE.  
238  
MIDLAND, TX 79705

RANGE OPERATING NEW MEXICO,  
LLC  
100 THROCKMORTON ST.; STE.  
1200  
FORT WORTH, TX 76102

RANGER 40 PETROLEUM, LLC  
1004 COLLIER CENTER WAY  
#206  
NAPLES, FL 34110

ROBERT H. FORREST  
JR. OIL, LLC  
609 ELORA DR.  
CARLSBAD, NM 88220

TENSION OIL CO.  
1925 HOSPITAL PLACE  
ABILENE, TX 79606

WESTBROOK OIL CORP.  
P. O. BOX 2264  
HOBBS, NM 88241

WHITING OIL AND GAS  
CORPORATION  
400 W. ILLINOIS  
MIDLAND, TX 79701

DR. AND MRS. J.E. WATKINS  
SCHOLARSHIP TRUST  
ATTN: MR. RUSTY PHENIX  
188 S. MAIN STREET  
HENDERSON, TX 75653

BURL H. ALEXANDER  
106 WEST ALABAMA STREET  
HOBBS, NM 88242

CHRISTEEN PRUETT  
4501 NO. CENTRAL RD.  
BETHANY, OK 73008

**SURFACE OWNERS:**

RRR LAND & CATTLE COMPANY  
2001 BARBERRY ROAD  
ROSWELL, NEW MEXICO 88201

DEEP WELLS RANCH, INC.  
STAR ROUTE, COMBEST RANCH  
JAL, NEW MEXICO 88252

JAMES R. PRUETT, ET UX WENDY  
13120 TURTLE CREEK DRIVE  
OKLAHOMA CITY, OK 73170

LOUIS Q. THOMAS  
201 EDGEWOOD STREET  
HUACHUCA, AZ 85616

LEA PARTNERS  
PO BOX 4967  
HOUSTON, TX 77210

C.D. WOOLWORTH TRUST  
JAL PUBLIC LIBRARY FUND  
PO BOX 178  
JAL, NM 88252

CASE 74646:

**Application of Resaca Operating Co. for horizontal contraction of the Langlie Mattix Pool and vertical extension of the Jalmat Gas Pool within the Cooper Jal Unit, Lea County, New Mexico.** Applicant in the above-styled cause seeks an order contracting the horizontal boundaries of the Langlie Mattix Pool to exclude the acreage within the Cooper Jal Unit and extending the vertical limits in the Jalmat Gas Pool to include the Seven Rivers and Queen formations within the Unit. The Unit Area consists of the following lands:

**TOWNSHIP 24 SOUTH, RANGE 36 EAST, NMPM**

Section 13: S/2  
Section 14: SE/4 SE/4  
Section 23: S/2 SE/4  
Section 24: All  
Section 25: N/2  
Section 26: E/2 NE/4

**TOWNSHIP 24 SOUTH, RANGE 37 EAST, NMPM**

Section 18: All  
Section 19: W/2  
Section 30: NW/4

Said area is located approximately 5 miles north of Jal, New Mexico.