

BEFORE THE  
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION  
OF ANSON GAS CORPORATION FOR  
COMPULSORY POOLING AND AN  
UNORTHODOX OIL WELL LOCATION,  
LEA COUNTY, NEW MEXICO.

CASE NO. \_\_\_\_\_

**APPLICATION**

ANSON GAS CORPORATION, through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat. Ann. § 70-2-17, (1978), for an order pooling all mineral interests from the surface to the base of the Atoka formation in the N/2 SE/4 of Section 15, Township 17 South, Range 37 East, Humble City-Strawn Pool, N.M.P.M., Lea County, New Mexico, and in support thereof states:

1. Applicant owns or represents approximately 86% of the working interests in the N/2 SE/4 of Section 15, and Applicant has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced spacing or proration unit to its Shipp 15 Well No. 1 to be drilled at an unorthodox well location in the N/2 SE/4 of said Section 15, to a depth of approximately 11,750 feet, more or less, to test any and all formations from the surface to the base of the Atoka formation.
3. Applicant has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the N/2 SE/4 of said Section 15.

4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

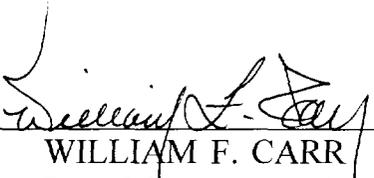
5. Applicant also seeks an exception to the provisions of Rule 4 of the Special Rules and Regulations for the Humble City-Strawn Pool (Order No. R-4338) to permit the drilling of this well at an unorthodox oil well location 2130 feet from the South line and 510 feet from the East line of said Section 15.

6. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all 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 an Examiner of the Oil Conservation Division on October 27, 1994 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well and approving an unorthodox location for the well.

Respectfully submitted,

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& SHERIDAN, P.A.

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