KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

Post Office Box 2265

SANTA FE, NEW MEXICO 87504-2265

June 19, 1995

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

HAND DELIVERED

Mr. Michael E. Stogner Chief Hearing Examiner Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

> Application of Marathon Oil Company for the Expansion of the Cemetery-Morrow Gas Pool and the Corresponding Contraction of the Indian Basin-Morrow

Gas Pool, Eddy County, New Mexico.

RECEIVED

Oil Conservation Division

Dear Mr. Stogner:

W THOMAS KELLAHIN*

Re:

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION

RECOGNIZED SPEC:ALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1998)

On behalf of Marathon Company, please find enclosed our referenced application which we request be set for hearing on the next available Examiner's docket now scheduled for July 13, 1995.

By copy of this letter and application, sent regular mail, we are notifying all interested parties of their right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the application and that failure to appear at the hearing may preclude them from any involvement in this case at a later date.

Pursuant to the Division's Memorandum 2-90, all parties are hereby informed that if they appear in this case, then they are requested to file a Pre-Hearing Statement with the Division not later than 4:00 PM on Friday, July 7, 1995, with a copy delivered to the undersigned.

Also enclosed is our proposed advertisement of this case for the NMOCD docket.

W. Thomas,

Marathon Oil Company attn: Tom Lowry, Esq.

cc:

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JUN 1 9 1995

Oil Conservation Division

PROPOSED ADVERTISEMENT

CASE 1 Application of Marathon Oil Company for the Expansion of the Cemetery Morrow Gas Pool and the Contraction of the Indian Basin-Morrow Gas Pool, Eddy County, New Mexico. Applicant, in the above styled cause, seeks an order expanding the Cemetery-Morrow Gas Pool to include all of irregular Sections 35 and 36, Township 20-1/2 South, Range 23 East, and all of Sections 1,2,11,12 and 14 of Township 21 South, Range 23 East, Eddy County, New Mexico and the corresponding contraction of the Indian Basin-Morrow Gas Pool to delete said acreage from that pool. This acreage is located approximately 11-1/2 miles southwest of Seven Rivers, New Mexico.

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

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

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JUN 1 9 1995

Oil Conservation Division

APPLICATION OF MARATHON OIL COMPANY FOR THE EXPANSION OF THE CEMETERY-MORROW GAS POOL AND THE CONTRACTION OF THE INDIAN BASIN-MORROW GAS POOL, EDDY COUNTY, NEW MEXICO.

CASE NO. 1/333

APPLICATION

Comes now MARATHON OIL COMPANY, by its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation for an order expanding the Cemetery Morrow Gas Pool to include all of irregular Sections 35 and 36, Township 20-1/2 South, Range 23 East, and all of Sections 1, 2, 11, 12, 13 and 14 of Township 21 South, Range 23 East, Eddy County, New Mexico and the corresponding contraction of the Indian Basin-Morrow Gas Pool to delete said acreage from that pool, and in support thereof states:

1. Marathon Oil Company is the operator of the North Indian Basin Unit which includes all of Sections 2 and 11, Township 21 South, Range 23 East, Eddy County, New Mexico, and other lands not subject to this Application. Marathon is also the operator of leases covering all of Section 36, Township 20-1/2 South, Range 23 East, and all of Section 1 and the W/2 of Section 12, Township 21 South, Range 23 East, all in Eddy County, New Mexico. Marathon also owns undeveloped leasehold in the E/2 of Section 12, Township 21 South, Range 23 East, Eddy County, New Mexico. See Exhibit "A" attached.

NMOCD Application Marathon Oil Company Page 2.

- 2. The Cisco/Canyon formation is the principal productive formation within the area described in paragraph (1) above and is included within the current boundaries of the South Dagger Draw-Upper Pennsylvanian Associated Pool which provides, among other things, for 320-acre proration and spacing units with well locations to be not closer than 660 feet to the outer boundary of said units.
- 3. The Morrow formation within Sections 2 and 14 of the area described in paragraph (1) is currently in the Indian Basin-Morrow Gas Pool with the balance of the area being within one-mile of the outer boundaries of **both** the Cemetery-Morrow Gas Pool and the Indian Basin-Morrow Gas Pool.
- 4. The Morrow wells in both the Indian Basin-Morrow Gas Pool and the Cemetery-Morrow Gas Pool will drain no more than 320 acres.
- 5. The Cemetery-Morrow Gas Pool is subject to 320-acre gas spacing and proration units with wells to be located not closer than 1980 feet from the end boundaries and 660 feet from the side boundaries of said units, while the Indian Basin-Morrow Gas Pool is subject to 640-acre gas spacing and proration units with wells to be not closer than 1650 feet to any outer boundary of said units.
- 6. The Morrow formation within this area is approximately 1600 feet below the Cisco/Canyon formation and is a secondary objective which only can be economically explored in conjunction with the drilling of a well for production from the Cisco/Canyon formation.
- 7. In order to afford an opportunity to drill a well to test both the Cisco/Canyon formation of the South Dagger Draw-Upper Pennsylvanian Associated Pool and the Morrow formation, it is necessary to have the Morrow formation spaced on the same 320-acre spacing pattern as established for the South Dagger Draw-Upper Pennsylvanian Associated Pool.
- 8. In order to prevent the drilling of unnecessary wells and to protect correlative rights and provide for the orderly development of the Morrow reservoir as a secondary objective in conjunction with the drilling of Cisco/Canyon wells it is necessary to contract the Indian Basin-Morrow Gas Pool and to extend the Cemetery Morrow Gas Pool as requested.

- 9. The granting of this Application will allow the same ownership in the two formations because the spacing units will be the same.
- 10. Notification of this application and request for hearing to be held on July 13, 1995 has been sent to those parties identified on Exhibit "B" attached.

Wherefore, Applicant requests that, after notice and hearing, this application be granted.

Respectfully submitted,

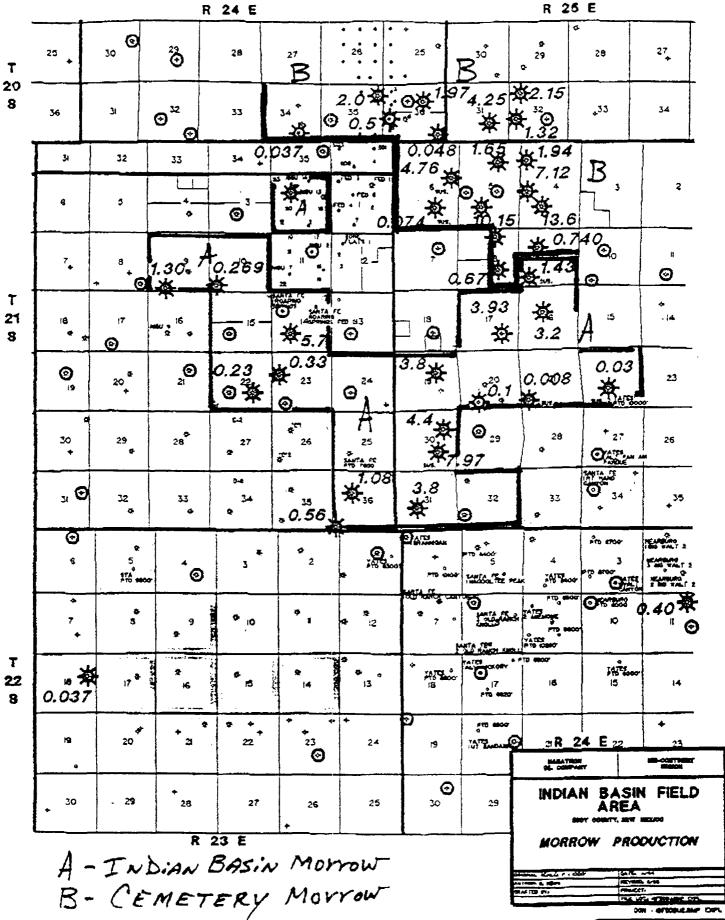
W. Thomas Kellahin

Kellahin & Kellahin

P. O. Box 2265

Santa Fe, New Mexico 87501

Thomas C. Lowry, Esq. Marathon Oil Company P. O. Box 552 Midland, Texas 79702



MORROW PRODUCER

2.15 CUM. PRODUCTION IN BCFG

O MORROW PENETRATION (DRY)

EXHIBIT

Re: Morrow Operators/Leasehold Owners Indian Basin Area (Bone Flats Lease) Eddy County, New Mexico

Yates Petroleum Corporation Yates Drilling Company Abo Petroleum Corporation Myco Industries, Inc. 105 South Fourth Street Artesia, New Mexico 88210

Conoco Inc. 10 Desta Drive, Suite 100w Midland, Texas 79705

Columbia Gas Development Corporation P. O. Box 1350 Houston, Texas 77251

Scuthwest Royalties, Inc. P. O. Box 11390 Midland, Texas 79702

Parker & Parsley Development Company P. O. Box 3178 Midland, Texas 79702

Devon Energy Corporation 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102

Santa Fe Energy Resources, Inc. 550 West Texas, Suite 1330 Midland, Texas 79701

Kerr McGee Corporation P. C. Box 25861 Oklahoma City, Oklahoma 73013

Citation Oil & Gas Corporation 8223 Willow Place Scuth, Suite 250 Houston, Texas 77070



Page 2 Offset Morrow Operator/Owner Memo

Central Resources, Inc. 2600 Mellon Center 1775 Sherman Street Denver, Colorado 80203

Landmark Oil & Gas Corporation 5080 Spectrum Drive, Suite 805 West Dallas, Texas 75248

Vivian Kral 1527 Hillside Road Fairfield, Connecticut 06490

William J. Graham Rosalynn S. Graham 3612 Pennsylvania Lane Plano, Texas 75075

General Atlantic Resources 1300 Main Street, Suite 512 Houston, Texas 77002

BHP Petroleum (Americas) Inc. 5847 San Felipe Street, Suite 3600 Houston, Texas 77057

Robert G. Hanagan Hugh E. Hanagan Box 1737 Roswell, New Mexico 88201

Merle Kelce 301 N. Memorial Drive St. Louis, Missouri

Nolan H. Brunson, Jr. Box 1039 Hobbs, New Mexico 88241

Meridian Oil Inc. P. O. Box 51810 Midland, Texas 79710

Merle Kelce 301 N. Memorial Drive St. Louis, Missouri 63102 Page 3 Offset Morrow Operator/Owner Memo

Frank W. Podpechan P. O. Box 549 Claremore, Oklahoma 74018

Merit Group II Partnership P. O. Box 351 Midland, Texas 79702