

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.  
LAWYERS

MICHAEL B. CAMPBELL  
WILLIAM F. CARR  
BRADFORD C. BERGE  
MARK F. SHERIDAN  
MICHAEL H. FELDEWERT  
ANTHONY F. MEDEIROS  
PAUL R. OWEN  
CATHERINE M. MOSS  
JACK M. CAMPBELL  
OF COUNSEL

JEFFERSON PLACE  
SUITE 1 - 110 NORTH GUADALUPE  
POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
FACSIMILE: (505) 983-6043  
E-MAIL: ccbspa@ix.netcom.com

October 13, 1998

OIL CONSERVATION DIV.

98 OCT 13 PM 5:02

**HAND-DELIVERED**

12077

Lori Wrotenbery, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
2040 South Pacheco Street  
Santa Fe, New Mexico 87503

Re: *Application of Enron Oil and Gas Company for Compulsory Pooling, Eddy  
County, New Mexico*

Dear Ms. Wrotenbery:

Enclosed in triplicate is the Application of Enron Oil and Gas Company in the above-referenced case as well as a copy of the legal advertisement. Enron Oil and Gas Company requests that this matter be placed on the docket for the November 5, 1998 Examiner hearings.

Very truly yours,

  
Paul R. Owen

PRO:mlh  
Enclosures  
cc: Mr. Patrick Tower (w/enclosures)

**BEFORE THE**

**OIL CONSERVATION DIVISION**

**NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES**

OIL CONSERVATION DIV.  
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IN THE MATTER OF THE APPLICATION  
OF ENRON OIL AND GAS COMPANY  
FOR COMPULSORY POOLING  
EDDY COUNTY, NEW MEXICO.

CASE NO. 12077

**APPLICATION**

ENRON OIL AND GAS COMPANY ("Enron"), through its undersigned attorneys, hereby makes application pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral interests in all formations developed on 320-acre spacing underlying the W/2, in all formations developed on 160-acre spacing in the NW/4, in all formations developed on 80-acre spacing in the S/2 NW/4 and in all formations developed on 40-acre spacing from the surface to the base of the Chester formation in the SE/4 NW/4 of irregular Section 19, Township 16 South, Range 29 East, Eddy County, New Mexico. In support of this Application, Enron states:

1. Enron is a working interest owner in the W/2 of said Section 19, on which it proposes to drill its wildcat Sabres "19" Federal Com. No. 1 Well at an unorthodox location 1846 feet from the North line and 926 feet from the West line of said Section 19 to a depth of approximately 10,500 feet to test any and all formations from the surface to the base of the Chester formation.

2. The unorthodox location at which the proposed well is to be drilled was

approved on September 30, by administrative process, by letter from Lori Wrotenbery, Director of the New Mexico Oil Conservation Division.

3. Enron has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the W/2 of said Section 19.

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

5. In order to permit Enron 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.

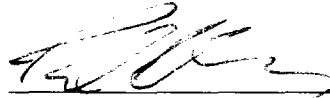
6. Granting this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Enron Oil and Gas Company requests that this application be set for hearing before an Examiner of the Oil Conservation Division on November 5, 1998 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions designating Enron operator of the W/2 of said Section 19, authorizing Enron to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well.

Respectfully submitted,

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.

By:



WILLIAM F. CARR

PAUL R. OWEN

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR ENRON OIL AND  
GAS COMPANY

CASE 12077

OIL CONSERVATION DIV.

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Application of Enron Oil and Gas Company for compulsory pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order pooling all formations developed on 320-acre spacing underlying the W/2, in all formations developed on 160-acre spacing in the NW/4, in all formations developed on 80-acre spacing in the S/2 NW/4 and in all formations developed on 40-acre spacing from the surface to the base of the Chester formation in the SE/4 NW/4 of Section 19, Township 16 South, Range 29 East, Eddy County, New Mexico. Applicant proposes to dedicate this acreage to its Sabres "19" Federal Com. No. 1 Well to be drilled at an administratively-approved unorthodox location 1846 feet from the North line and 926 feet from the West line of said Section 19. Also to be considered will the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 12 miles northwest of Loco Hills, New Mexico.