

**IN THE MATTER OF THE APPLICATION
OF BTA OIL PRODUCERS FOR SIMULTANEOUS
DEDICATION, LEA COUNTY, NEW MEXICO**

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

William F. Carr

My Commission Expires: Aug 23, 2005

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Case No. 12648 Exhibit No. 2
Submitted by:
BTA Oil Producers
Hearing Date: November 1, 2001

EXHIBIT A
APPLICATION OF BTA OIL PRODUCERS
FOR SIMULTANEOUS DEDICATION,
LEA COUNTY, NEW MEXICO.

NOTICE LIST

Marathon Oil Company
Post Office Box 552
Midland, Texas 79702

Joe J. Reynolds
2124 Broadway
Lubbock, Texas 79401

RSE Partners - I,L.P.
C/o Ricks Exploration, Inc.
210 Park Avenue, Suite 3000
Oklahoma City, Oklahoma 73102-5621

Samson Hydrocarbons Company
Two West Second Street
Tulsa, Oklahoma 74103-3123

Samson Resources Company
Two West Second Street
Tulsa, Oklahoma 74103

Southwestern Energy Production Company
2350 North Sam Houston Parkway East,
Suite 300
Houston, Texas 77032

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210

HOLLAND & HART LLP
AND
CAMPBELL & CARR
ATTORNEYS AT LAW

DENVER • ASPEN
BOULDER • COLORADO SPRINGS
DENVER TECH CENTER
BILLINGS • BOISE
CHEYENNE • JACKSON HOLE
SALT LAKE CITY • SANTA FE
WASHINGTON, D.C.

SUITE 1
110 NORTH GUADALUPE
SANTA FE, NEW MEXICO 87501-6525
MAILING ADDRESS
P.O. BOX 2208
SANTA FE, NEW MEXICO 87504-2208

TELEPHONE (505) 988-4421
FACSIMILE (505) 983-6043
www.hollandhart.com

October 10, 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88201

Re: Application of BTA Oil Producers for simultaneous dedication, Lea
County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that BTA Oil Producers has filed the enclosed application with the New Mexico Oil Conservation Division seeking an exception to Rule 104.C.(2)(b) to permit the simultaneous dedication of the following wells to a 320-acre spacing and proration unit in the Atoka formation comprised of the N/2 of Section 35, Township 22 South, Range 34 East, NMPM: the Maddox Federal "B" well No. 1 to be recompleted from the Morrow formation at a standard gas well location 1980 feet from the North and West lines; and the Maddox Federal "B" Well No. 2 located at a standard gas well location 1980 feet from the North line and 660 feet from the West line of said Section 34 in the Antelope Ridge-Atoka Gas Pool.

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Parties appearing in cases are required by Division Rule 1208.B to file a Prehearing Statement three days in advance of a scheduled hearing. This statement must include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the

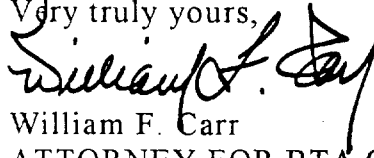
Affected Interest Owners

October 10, 2001

Page 2

approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Very truly yours,

A handwritten signature in black ink, appearing to read "William F. Carr", written over the typed name.

William F. Carr

ATTORNEY FOR BTA OIL PRODUCERS

Enc.

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AND
CAMPBELL & CARR
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Southwestern Energy Production Company
2350 North Sam Houston Parkway East
Suite 300
Houston, Texas 77032

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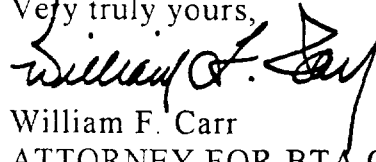
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William F. Carr

ATTORNEY FOR BTA OIL PRODUCERS

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Samson Resources Company
Two West Second Street
Tulsa, Oklahoma 74103

Re: Application of BTA Oil Producers for simultaneous dedication, Lea
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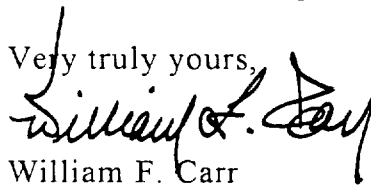
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William F. Carr

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Two West Second Street
Tulsa, Oklahoma 74103-3123

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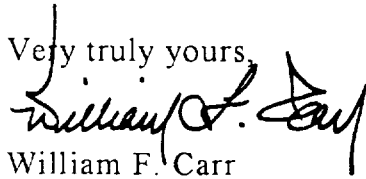
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William F. Carr

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RSE Partners - L.L.P.
c/o Ricks Exploration, Inc.
210 Park Avenue, Suite 3000
Oklahoma City, Oklahoma 73102-5621

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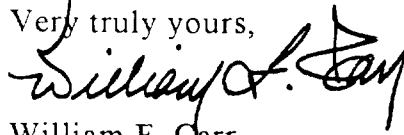
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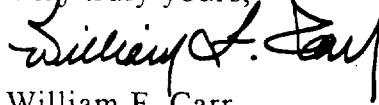
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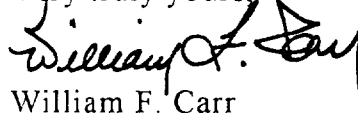
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William F. Carr

ATTORNEY FOR BTA OIL PRODUCERS

Enc.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage)

44490.0006

Postage \$.57
 Certified Fee 2.10
 Return Receipt Fee (Endorsement Required) 1.50
 Restricted Delivery Fee (Endorsement Required)
 Total Postage & Fees \$ 4.17

Recipient's Name Marathon Oil Company
 Street, Apt. No. Post Office Box 552
 City, State, ZIP Midland, Texas 79702

PS Form 3800

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Marathon Oil Company
 Post Office Box 552
 Midland, Texas 79702

2. Article Number (Copy from service label)

7000 0600 0024 3128 1129

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-172

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

RSE Partners - I.L.P.
 C/o Ricks Exploration, Inc.
 210 Park Avenue, Suite 3000
 Oklahoma City, Oklahoma
 73102-5621

2. Article Number (Copy from service label)

7000 0600 0024 3128 1105

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-172

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Joe J. Reynolds
 2124 Broadway
 Lubbock, Texas 79401

2. Article Number (Copy from service label)

7000 0600 0024 3128 1136

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-172

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 Frankie Vinson OCT 15 2001

C. Signature
 X Frankie Vinson ☐ Agent ☐ Address

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage)

44490.0006

Postage \$.57
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Recipient's Name RSE Partners - I.L.P.
 Street, Apt. No. C/o Ricks Exploration, Inc.
 City, State, ZIP 210 Park Avenue, Suite 3000
 Oklahoma City, Oklahoma
 73102-5621

PS Form 3800

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7000 0600 0024 3128 1105

PS Form 3811, July 1999

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102595-99-M-172

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C. Signature
 X Joe J. Reynolds ☒ Agent ☐ Address

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 (Domestic Mail Only; No Insurance Coverage)

44490.0006

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 Certified Fee 2.10
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 Total Postage & Fees \$ 4.17

Recipient's Name (Please Print Clearly) Joe J. Reynolds
 Street, Apt. No. or PO Box No. 2124 Broadway
 City, State, ZIP Lubbock Texas 79401

PS Form 3800, February 2000

See Reverse

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

44490.0006

Postage \$ 1.57
Certified Fee 2.10
Return Receipt Fee (Endorsement Required) 1.50
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$ 4.17

Recipient's Name Samson Hydrocarbons
Street, Apt. No. Two West Second Street
City, State, ZIP Tulsa, Oklahoma 74103

PS Form 3800, July 1999

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Samson Hydrocarbons Company
Two West Second Street
Tulsa, Oklahoma 74103-3123

2. Article Number (Copy from service label)

7000 0600 0024 3128 1099

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery 10/16/01

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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Recipient's Name Samson Resources Company
Street, Apt. No. Two West Second Street
City, State, ZIP Tulsa, Oklahoma 74103

PS Form 3800, July 1999

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Samson Resources Company
Two West Second Street
Tulsa, Oklahoma 74103

2. Article Number (Copy from service label)

7000 0600 0024 3128 1082

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

A. Received by (Please Print Clearly) B. Date of Delivery 10/16/01

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

44490.0006

Postage \$ 1.57
Certified Fee 2.10
Return Receipt Fee (Endorsement Required) 1.50
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$ 4.17

Recipient's Name Southwestern Energy
Street, Apt. No. Production Company
City, State, ZIP 2350 North Sam Houston
Parkway East, Suite 300
Houston, Texas 77032

PS Form 3800, July 1999

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

WFC/BTA

44490-9

Postage \$ 1.57

Certified Fee 2.16

Return Receipt Fee (Endorsement Required) 1.50

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$ 4.17

Recipient's Name

Street, Apt. No., etc.

City, State, ZIP+4

Yates Petroleum Corp
 105 South Fourth Street
 Artesia, New Mexico 88210

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Yates Petroleum Corporation
 105 South Fourth Street
 Artesia, New Mexico 88210

2. Article Number (Copy from service label)

7000 0600 0024 3128 1068

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 10/2/01

C. Signature **PATTI CARLILE**

X *Patti Carlile* ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
 If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes