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

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

CASE NO. /2748

APPLICATION

BTA OIL PRODUCERS ("BTA"), through its undersigned attorneys, hereby makes application for an order authorizing the simultaneous dedication of the following wells located in the NW/4 of Section 35, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico to the 320-acre spacing and proration unit in the Antelope Ridge-Atoka Gas Pool comprised of the N/2 of said Section 35:

- A. Maddox Federal "B" Well No. 1 (API No. 30-025-27941) located in Unit F at a standard gas well location 1980 feet from the North and West lines, and
- B. Maddox Federal "B" Well No. 2 (API No. 30-025-30128) located in Unit E at a standard gas well location 1980 feet from the North line and 660 feet from the West line.

In support of its application, BTA states:

- 1. The Atoka formation in the Antelope Ridge-Atoka Gas Pool consists of multiple pay intervals (the A, B, and C zones) which are separate from and not in communication with other pay intervals in the Atoka formation.
- 2. BTA is the operator of a standard 320-acre spacing and proration of the N/2 of Section 35, Township 22 South, Range 34 East, NMPM, Lea County New Mexico. This spacing

unit is currently dedicated in the Maddox Federal "B" Well No.2 which produces from the Atoka A and C zones.

- 3. The Special Pool Rules and Regulations for the Antelope Ridge-Atoka Gas Pool (Order No. R-3050) provide that the pool is governed by the acreage and well location requirements of Division Rule 104.C.(2) which provides, in part:
 - the initial well on a 320-acre unit shall be located no closer than 660 feet to the outer boundary of the quarter section on which the well is located and no closer than 10 feet to any quarter-quarter section line or subdivision inner boundary: and
 - (b) only one infill well on a 320-acre unit shall be allowed provided that the well is located in the quarter section on the 320-acre unit not containing the initial well and is no closer than 660 feet to the outer boundary of the quarter section and no closer than 10 feet to any quarter-quarter section line or subdivision inner boundary.
- 4. BTA seeks an exception to Rule 104.C.(2)(b) to permit it to re-complete the Maddox Federal "B" Well No. 1 from the Morrow formation, Antelope Ridge-Morrow Gas Pool, to the Atoka B zone of the Antelope Ridge-Atoka Gas Pool. This location will be in the same quarter section containing the initial Atoka well on this spacing unit.
- 5. Approval of the re-completion of the Maddox Federal "B" Well No. 1 and the simultaneous dedication of the Maddox Federal "B" Well Nos. 1 and 2 to the Atoka spacing unit comprised of the N/2 of Section 35 will protect correlative rights by affording BTA the opportunity to produce the reserves in the separate and distinct Atoka pay zones under this spacing unit which cannot currently be produced by the Maddox Federal "B" Well No. 2.

6. The names and addresses of the persons to whom notice of this application will be

provided in accordance with Oil Conservation Division Rules and Regulations is attached hereto as

Exhibit A.

7. Approval of this application will be in the best interest of conservation, the prevention

of waste and the protection of correlative rights.

WHEREFORE, BTA Oil Producers requests that this application be set for hearing before an

Examiner of the Oil Conservation Division on November 1, 2001 and after notice and hearing as

required by law, the Division enter its order granting an exception to Division Rule 104.C.(2)(b) and

approving the simultaneous dedication of the N/2 of Section 35 to the BTA Maddox Federal "B"

Well No 1 to be recompleted from the Morrow formation at a location 1980 feet from the North and

West lines of Section 35 to be produced from the B zone of the Atoka formation; and the BTA

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 to be produced from the A and C zones of the Atoka formation

Respectfully submitted,

HOLLAND & HART LLP

AND

CAMPBELL & CARR

William H. Carr

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR BTA OIL PRODUCERS.

APPLICATION

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, Oklahoma74103

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

CASE <u>12748</u>:

Application of BTA Oil Producers for simultaneous dedication, Lea County, New Mexico. Applicant in the above-styled cause seeks an exception to Division 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 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 14 in the Antelope Ridge-Atoka Gas Pool. Said wells are located approximately 28 miles southwest of Eunice, New Mexico.