

**EXHIBIT A**

**APPLICATION OF SEELY OIL COMPANY  
FOR CONTRACTION OF THE UNITIZED  
FORMATION IN THE E-K QUEEN UNIT,  
LEA COUNTY, NEW MEXICO**

**NOTIFICATION LIST**

Boswell Interests Ltd.  
1320 Lake Street  
Fort Worth, Texas 76102

CEB Oil Company  
1320 Lake Street  
Fort Worth, Texas 76102

Merlyn W. Dahlin and wife,  
Ruth G. Dahlin  
3220 North Freeway  
Fort Worth, Texas 76111

James Robert Hill, Virginia Glenn Hill  
Lattimore and John A. Styrsky, Trustees of  
the Houston and Emma Hill Trust Estate  
Suite 1802, 500 W. 7<sup>th</sup> Street, Unit 16  
Fort Worth, Texas 76102-4772

PVB Oil Company  
1320 Lake Street  
Fort Worth, Texas 76102

J. Cleo Thompson and  
James Cleo Thompson, Jr., L.P.  
325 North St. Paul, Suite 4300  
Dallas, Texas 76201

Michael J. Havel and Wife, Kathleen A. Havel  
7607 Chalkstone  
Dallas, Texas 75248

SSV&H Associates  
815 West 10<sup>th</sup> Street  
Fort Worth, Texas 76102

Bureau of Land Management  
Attention: Armando Lopez  
2909 W. 2<sup>nd</sup> Street  
Roswell, New Mexico 88201

Burnett Oil Company  
801 Cherry Street, Suite 1500  
Fort Worth, Texas 76102

EAB Oil Company  
1320 Lake Street  
Fort Worth, Texas 76102

Express Air Drilling, Inc.  
3838 Oak Lawn Avenue  
Two Turtle Creek Village  
Dallas, Texas 75219-4516

Commissioner of Public Lands  
New Mexico State Land Office  
Attention: Pete Martinez  
Post Office Box 1148  
Santa Fe, NM 87504-1148

C. W. Seely and wife, Ian B. Seely  
815 West 10<sup>th</sup> Street  
Fort Worth, Texas 76102

David L. Henderson and wife,  
Dawn Henderson  
815 West 10<sup>th</sup> Street  
Fort Worth Texas 76102

WES-TEX Drilling Company, L.P.  
P. O. Box 3739  
Abilene, Texas 79604

John P. Oil Company  
1320 Lake Street  
Fort Worth, Texas 76102

**RECEIVED**  
JUN 21 2002

BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Case No. 12891 Exhibit No. 10

Submitted by:

SEELY OIL COMPANY

Hearing Date: July 11, 2002

HOLLAND & HART<sup>LLP</sup>  
ATTORNEYS AT LAW

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

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

TELEPHONE (505) 988-4421  
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

**RECEIVED**  
JUN 27 2002

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO ALL AFFECTED PARTIES**

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

The proposed contraction of the unitized vertical interval will eliminate from the Unit Area the Penrose member of the Queen formation. There currently is no production from this portion of the Queen formation and no waterflood operations have been conducted in this reservoir. Contraction of the unitized interval in the E-K Queen Unit will enable Seely to form a voluntary unit in the Penrose interval for the purpose of initiating secondary recovery operations. The new unit will be comprised of lands within and outside of the current E-K Queen Unit boundaries will enable the owners of productive acreage in the Penrose member of the Queen formation to share the production from this new unit.

This application has been set for hearing before a Division Examiner on July 11, 2002 at 8:15 a.m. The hearing will be held in the Aztec City Council Chambers located at 201 West Chaco, Aztec, New Mexico. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Pre-hearing Statement three days in advance of a scheduled hearing at the Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 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.

HOLLAND & HART <sup>LLP</sup>  
ATTORNEYS AT LAW

June 20, 2002

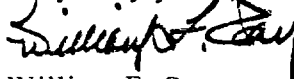
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

Boswell Interests, Ltd.,  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By: 

By: Fleur De Lis, LLC, General Partner

Name: John P. Boswell

Title: President

Date: 6/26/02

Enclosure

cc: Mr. Clarence Stumhoffer

**HOLLAND & HART** LLP  
ATTORNEYS AT LAW

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HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

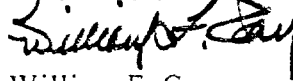
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

All Companies Listed,  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By: \_\_\_\_\_

Name: John P. Boswell

Title: Vice President

Date: 6/26/02

EAB Oil Company    CEB Oil Company  
PVB Oil Company    John P. Oil Company

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART <sup>LLP</sup>  
ATTORNEYS AT LAW

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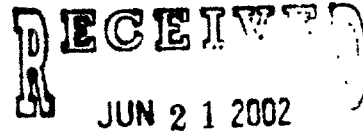
P.O. BOX 2208  
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William F. Carr

wcarr@hollandhart.com

June 20, 2002



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HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

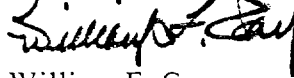
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Your attention to this matter is appreciated.

Very truly yours,

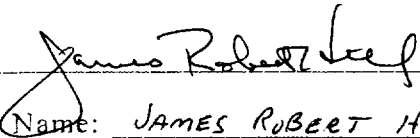


William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

HOUSTON & EMMA HILL TRUST ESTATE  
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: \_\_\_\_\_

  
Name: JAMES ROBERT HILL  
Title: TRUSTEE  
Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP  
ATTORNEYS AT LAW

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William F. Carr

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June 20, 2002

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**RECEIVED**  
**JUN 25 2002**

**TO ALL AFFECTED PARTIES**

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HOLLAND & HART <sup>LLP</sup>  
ATTORNEYS AT LAW

June 20, 2002

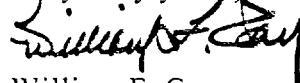
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Your attention to this matter is appreciated.

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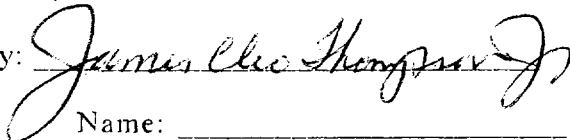
William F. Carr

Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

**J. Cleo Thompson & James Cleo Thompson, Jr., L.P.**

through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART<sup>LLP</sup>  
ATTORNEYS AT LAW

DENVER • ASPEN  
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FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

**RECEIVED**  
JUN 26 2002

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO ALL AFFECTED PARTIES**

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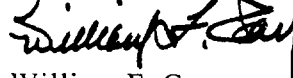
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Your attention to this matter is appreciated.

Very truly yours,



William F. Carr

Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

Michael S & Kathleen A Havel  
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: MIKE HAVEL  
Title: Owner  
Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

**HOLLAND & HART** LLP  
ATTORNEYS AT LAW

DENVER • ASPEN  
BOULDER • COLORADO SPRINGS  
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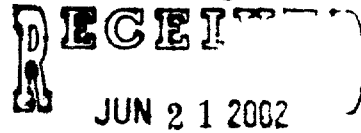
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ATTORNEYS AT LAW

June 20, 2002

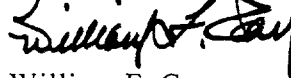
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Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

SSV&H Associates,  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By: David L. Henderson

Name: David L. Henderson  
Title: Managing Partner  
Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART <sup>LLP</sup>  
ATTORNEYS AT LAW

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BOULDER • COLORADO SPRINGS  
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The proposed contraction of the unitized vertical interval will eliminate from the Unit Area the Penrose member of the Queen formation. There currently is no production from this portion of the Queen formation and no waterflood operations have been conducted in this reservoir. Contraction of the unitized interval in the E-K Queen Unit will enable Seely to form a voluntary unit in the Penrose interval for the purpose of initiating secondary recovery operations. The new unit will be comprised of lands within and outside of the current E-K Queen Unit boundaries will enable the owners of productive acreage in the Penrose member of the Queen formation to share the production from this new unit.

This application has been set for hearing before a Division Examiner on July 11, 2002 at 8:15 a.m. The hearing will be held in the Aztec City Council Chambers located at 201 West Chaco, Aztec, New Mexico. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Pre-hearing Statement three days in advance of a scheduled hearing at the Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 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.

HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

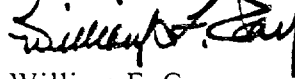
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr

Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

**Burnett Oil Company**,

through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: 

Name: **William D. Pollard**

Title: **President of Burnett Oil Co., Inc., Manager of Burnett Oil Company**

Date: **6-25-02**

Enclosure

cc: Mr. Clarence Stumhoffer

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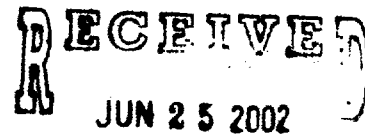
P.O. BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
110 NORTH GUADALUPE, SUITE 1  
SANTA FE, NEW MEXICO 87501-6525

TELEPHONE (505) 988-4421  
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

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This application has been set for hearing before a Division Examiner on July 11, 2002 at 8:15 a.m. The hearing will be held in the Aztec City Council Chambers located at 201 West Chaco, Aztec, New Mexico. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 1208.B to file a Pre-hearing Statement three days in advance of a scheduled hearing at the Division's Santa Fe office located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. 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 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.



HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

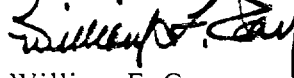
Page 2

You have previously been contacted concerning the contraction of the unitized formation in this unit. Seely Oil Company requests that you waive objection to the contraction of the unitized interval in the E-K Queen Unit Area by signing a copy of this letter on the line provided and returning it to Seely Oil Company in the enclosed envelope.

If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

EXPRESS AIR DRILLING, INC.,  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By: Norm W. Smith

Name: NORMAN W. SMITH

Title: President

Date: 6-21-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART<sup>LLP</sup>  
ATTORNEYS AT LAW

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110 NORTH GUADALUPE, SUITE 1  
SANTA FE, NEW MEXICO 87501-6526

TELEPHONE (505) 988-4421  
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

RECEIVED  
JUN 25 2002

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

TO ALL AFFECTED PARTIES

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

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HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

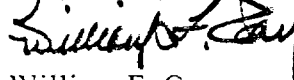
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

C. W. Seely and Ina B. Seely,  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By: 

Name: CW Seely

Title: \_\_\_\_\_

Date: 6-24-02

Enclosure

cc: Mr. Clarence Stumhoffer

**HOLLAND & HART LLP**  
ATTORNEYS AT LAW

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SANTA FE, NEW MEXICO 87501-6525

TELEPHONE (505) 988-4421  
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**RECEIVED**  
**JUN 25 2002**

**TO ALL AFFECTED PARTIES**

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that Seely Oil Company has filed the enclosed application with the New Mexico Oil Conservation Division seeking authorization to contract the unitized interval in the E-K Queen Unit Area which is located in portions of Township 18 South, Ranges 33 and 34 East, NMPM, Lea County, New Mexico. The unit boundaries are fully identified in the application.

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HOLLAND & HART LLP  
ATTORNEYS AT LAW

June 20, 2002

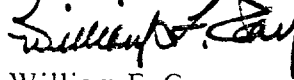
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,



William F. Carr  
Attorney for Seely Oil Company

WAIVER OF OBJECTION:

David F. Dawn Henderson  
through its undersigned authorized representative, waives objection to the application of Seely Oil Company for the contraction of the unitized interval in the E-K Queen Unit.

By: David F. Dawn Henderson

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: 6-20-02

Enclosure

cc: Mr. Clarence Stumhoffer

HOLLAND & HART LLP  
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TELEPHONE (505) 988-4421  
FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

June 20, 2002

RECEIVED  
JUN 26 2002

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO ALL AFFECTED PARTIES**

Re: Application of Seely Oil Company for contraction of the unitized formation in the E-K Queen Unit, Lea County, New Mexico.

Ladies and Gentlemen:

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HOLLAND & HART <sup>LLP</sup>  
ATTORNEYS AT LAW

June 20, 2002

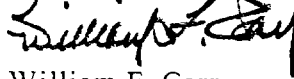
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If you have questions concerning this well or application, please call Clarence Stumhoffer at Seely Oil Company, Post Office Box 100416, Fort Worth, Texas 76185, telephone number (817) 946-8795.

Your attention to this matter is appreciated.

Very truly yours,

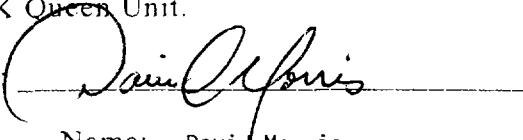


William F. Carr  
Attorney for Seely Oil Company

**WAIVER OF OBJECTION:**

WES-TEX Drilling Company, L.P.  
BY: WES-TEX Holdings, LLC, General Partner  
through its undersigned authorized  
representative, waives objection to the  
application of Seely Oil Company for the  
contraction of the unitized interval in the  
E-K Queen Unit.

By



Name: David Morris  
Title: Executive Vice President  
Date: 6/21/02

Enclosure

cc: Mr. Clarence Stumhoffer