Cure 72

BEFORE THE OIL CONSERVATION COMMISSION

OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

CASE NO. 40

ORDER NO. 541.

THE APPLICATION OF THE SOUTHERN UNION PRODUCTION COMPANY FOR 160 ACRE SPACING FOR GAS WELLS IN THE FULCHER BASIN FIELD DEFINED FOR THE PURPOSE OF SAID APPLICATION TO CONSIST OF THE FOLLOWING LANDS: SECTIONS 34 and 35, TOWNSHIP 30 NORTH, RANGE 12 WEST N.M.P.M., SECTIONS 1, 2, 3, E2 10, 11, 12 & 13, TOWNSHIP 29 NORTH, RANGE 12 WEST, N.M.P.M., SECTIONS 7, 17, 18, 19, 20 and 21, TOWNSHIP 29 NORTH, RANGE 11 WEST, N.M.P.M.

MOTION FOR CONTINUANCE

Comes now Southern Union Production Company by its attorney Manuel

A. Sanchez and respectfully requests that the hearing on the matter of the
spacing of the wells in the Fulcher Basin Field be deferred for a period of
sixty days, and as grounds therefor states that the period of sixty days is
necessary to further study the problem of the spacing of wells.

That at the present time the cost of a well is about \$15,000.00, and that a 40 acre well spacing might not be economical or for the best interests of conservation.

That the questions presented that companies who have developed their leases on the 160 acre pattern will have to redrill their leases on the 40 acre pattern to protect themselves and the royalty owners from drainage from wells drilled on 40 acre spacing.

That the matter of the economical spacing of wells, economic development of the field and the matter of the interest of conservation are involved in the determination of the spacing of said wells, and that a study of this matter is required in order that a proper solution of the problem may be arrived at, and that the 60 day time for the study of said problem is necessary.

Respectfully submitted,

Attorney for Southern Union

Production Company