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HUMBLE OIL & REFINING COMPANY

MIDLAND, TEXAS

J. W. HOUSE

1954 JUL 3 PN 1 July 6, 1954

File: 6-1 New Mexico

New Mexico Oil Conservation Commission Box 871 Santa Fe, New Mexico

Attention of Mr. William B. Macey

Gentlemen:

The Humble Oil & Refining Company requests that the following statement be made a part of the record in Case 330 and 330-A, concerning an Order promulgating rules and regulations for the Blanco-Mesa Verde Gas Pool. The above cases were called for hearing June 21, 1954.

"While the Humble Oil & Refining Company has no direct interest in the Blanco-Mesa Verde Gas Pool, it has substantial lease interests in the San Juan area which will be directly affected by any precedent establishing gas proration within that area. The Humble Oil & Refining Company has consistently advocated and supported the proration of oil on an acreage basis in New Mexico. From the producers standpoint, the basic principals of the proration of oil and the proration of gas are the same. The Humble Oil & Refining Company recommends that the Blanco-Mesa Verde Gas Pool be prorated on an acreage basis. In the event that the Commission determines that either deliverability or bottom hole pressure shall be used in a proration formula, it is our recommendation that pressure is perferable to deliverability and that use of pressure be limited to the following weight: 75 percent acreage plus 25 percent acreage times bottom hole pressure."

Yours very truly,

HUMBLE OIL & REFINING COMPANY

J. W. HOUSE

BY: R. S. DEWEY