

Exhibit A

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION
OF JOHN P. CUSACK FOR AN ORDER
GRANTING PERMISSION TO RECOVER
BACK ALLOWABLES.

CASE NO. _____

APPLICATION

Comes now, John P. Cusack, an individual operating in the State of New Mexico, and in particular, Hobbs, New Mexico and respectively shows to the Oil Conservation Commission of the State of New Mexico:

1. That your Petitioner owns oil and gas producing property located in the Hobbs Pool, Lea County, New Mexico.
2. That during the month of May, through no fault of your Petitioner, there happened a national oil refinery strike and that because of said strike your Petitioner was not allowed to run through the pipe lines the oil allocated by this Commission to be run by him.
3. That at the same time and same place other oil and gas producers in the Hobbs Pool, not affected by the strike, ran 100% of their allowables thereby reducing and draining the reservoir of oil rightfully belonging to your Petitioner and his royalty holders.

WHEREFORE, your Petitioner respectfully requests that this Commission consider means and methods by which the back allowables lost through the result of strike action may be made up equitably for the benefit of your applicant and other applicants similarly situated in conformity with the pro ration laws of the State of New Mexico.

Respectfully submitted,

John P. Cusack
Agent for John P. Cusack