

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

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

THE APPLICATION OF EL PASO
NATURAL GAS COMPANY FOR
COMPULSORY COMMUNITIZATION
OF LOTS 3 AND 4, E/2 SW/4,
SE/4, (S/2) OF SECTION 31,
TOWNSHIP 31 NORTH, RANGE 11
WEST, NMPM, SAN JUAN COUNTY,
NEW MEXICO.

CASE NO. 707) Consolidated
CASE NO. 847)

THE APPLICATION OF EL PASO NATURAL
GAS COMPANY FOR DETERMINATION AND
RATIFICATION OF COMMUNITIZATION OF
LOTS 3 AND 4, E/2 SW/4, AND SE/4
(THESE LANDS COMPRISING THE S/2)
OF SECTION 31, TOWNSHIP 31 NORTH,
RANGE 11 WEST, SAN JUAN COUNTY,
NEW MEXICO.

APPLICATION FOR REHEARING

Come now Saul A. Yager, Marian Yager, M. E. Gimp,
Morris Mizel and wife, Flora Mizel, and Sam Mizel, by their
attorneys, Campbell & Russell, and make application to the
Commission for rehearing upon Order No. R-546-B, and as a basis
for the application state:

(a) Applicants are the owners of interests in Lot 4,
Section 31, Township 31 North, Range 11 West, N.M.P.M., San Juan
County, New Mexico and are parties affected by Order No. R-546-B
entered by the Commission on January 12, 1956.

(b) Order No. R-546-B is erroneous in the following
respects:

1. Finding No. 10 is erroneous in that Order
No. R-110 was not complied with in the establishment of the
drilling unit.

2. Finding No. 11 is erroneous in that all interests within said unit were not consolidated by pooling agreement or otherwise as required by Order No. R-110.

3. Order No. R-546-B is contrary to Section 1(a) of Order No. R-110 of the Commission.

4. Order No. R-546-B is contrary to Section 13(b) of Chapter 168, Laws of 1949, as amended.

5. Order No. R-546-B is an unreasonable and arbitrary interpretation of the Commission's rules and regulations and deprives Applicants of their correlative rights.

6. Order No. R-546-B deprives Applicants of their property without due process of law.

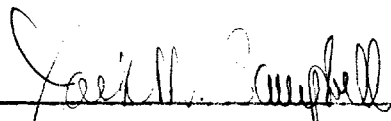
7. Order No. R-546-B impairs the obligations of a valid lease contract between Applicants and El Paso Natural Gas Company.

WHEREFORE, Applicants request a rehearing in Case No. 707 - 847 Consolidated on Order No. R-546-B.

Respectfully submitted,

Saul A. Yager, Marian Yager,
M. E. Gimp, Morris Mizel and
wife, Flora Mizel, and Sam
Mizel

By


for CAMPBELL & RUSSELL
their attorneys