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ILBERT, WHITE AND GILBERT
ATTORNEYS AT LAW
SANTA FE, NEW MEXICO

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BEFORE THE OIL CONSERVATION COMMISSION

OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF BRITISH-AMERICAN OIL COMPANY, PHILLIPS PETROLEUM COMPANY AND SUNRAY MID-CONTINENT OIL COMPANY FOR A TEMPORARY EMERGENCY ORDER GRANTING AN EXCEPTION TO THE COMMISSION'S ORDER A-97.

Case No. /353

APPLICATION

TO: THE HONORABLE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO.

Comes now British-American Oil Company, Phillips Petroleum Company, and Sunray Mid-Continent Oil Company and make application for the issuance by this Commission of a Temporary Emergency Order granting an exception to the Commission's Order A-97 effective December 1, 1957, which will limit the oil production in San Juan County to a unit allowable of 28 barrels per day, and as grounds in support of said Emergency Order respectfully state:

- 1. That by Order R-1027 issued August 7, 1957, this Commission authorized Sunray Mid-Continent Oil Company to institute a liquified petroleum and dry gas injection program into the Bisti-Lower Gallup Oil Pool, and that pursuant to said Order, an injection well was drilled in accordance with the terms and conditions specified in said Order.
- 2. That each of the Petitioners are interested parties in the Pilot Secondary Recovery Project herein mentioned and Sunray Mid-Continent Oil Company is the operator of the following producing oil wells within the Bisti-Lower Gallup Oil Pool within San Juan County, New Mexico, viz:

British-American Oil Company's Well Marye No. 1, located in Section 1, Township 25 North, Range 13 West;

Sunray Mid-Continent Oil Company's Well Federal C No. 1, located in Section 6, Township 25 North, Range 12 West; 1

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Sunray Mid-Continent Oil Company's Well Federal C No. 2, located in Section 31, Township 26 North, Range 12 West;

Phillips Petroleum Company's Well Hospah No. 1-A, located in Section 36, Township 26 North, Range 13 West.

- That the said injection program has been and now is proceeding satisfactorily and each of the four above mentioned oil wells, which are within the Pilot Area, have significantly responded to the injection program and now are and will be under the recovery program capable of producing oil far in excess of 28 barrels per day; that to curtail the production from said wells as required under Order A-97 would materially jeopardize the success of the injection program and would result in waste.
- That in order to utilize and obtain the greatest amount of benefit from the injection program and to obtain the production of oil which might not otherwise be recovered, each of the aforementioned wells should be allowed to produce up to a maximum of 160 barrels per day.
- That Sunray Mid-Continent Oil Company intends to and will present evidence before the Commission at its next regular hearing on December 18, 1957, to support all of the aforesaid allegations and will at that time ask the Commission to enter a permanent Order granting similar relief to avoid irreparable injury to Petitioners herein and others similarly situated.

WHEREFORE, Petitioners pray that the Commission issue a Temporary Emergency Order granting an exception to the Commission's Order A-97 by authorizing an allowable not to exceed 160 barrels per day for each of the aforementioned four wells.

Respectfully submitted,

BRITISH-AMERICAN OIL COMPANY, PHILLIPS PETROLEUM COMPANY, and SUNRAY MID-CONTINENT OIL COMPANY

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