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BEFORE THE OIL CONSERVATION COMMISSION

OF

NEW MEXICO

IN THE MATTER OF THE APPLICATION OF CAULKINS OIL COMPANY AND EL PASO NATURAL GAS PRODUCTS COMPANY FOR APPROVAL OF THE CONVERSION OF TWO WELLS TO WATER INJECTION IN THE BLANCO-TOCITO OIL POOL, RIO ARRIBA COUNTY, AND FOR AMENDMENT OF THE POOL RULES OF THE SOUTH BLANCO-TOCITO OIL POOL AND AN EXCEPTION TO THE PROVISIONS OF COMMISSION RULE 502.

Case No. 1420 Order No. R-1191-A

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APPLICATION FOR REHEARING

Comes now CAULKINS OIL COMPANY, one of the applicants in the above captioned case, and applies to the Oil Conservation Commission of New Mexico for rehearing on the provisions of Order No. R-1191-A entered therein, in so far, but only in so far as said order denies permission to deepen the Caulkins Oil Company Well No. T-123, located 700 feet from the North line and 1800 feet from the East line of Section 7, Township 26 North, Range 6 West, NMPM, and complete said well as a dual completion for production from the Dakota formation, and water injection into the Tocito formation as a part of the water-injection program in the South Blanco-Tocito Oil Pool, Rio Arriba County, New Mexico, and in support thereof would show:

1. By application, Caulkins Oil Company and El Paso Natural Gas Products Company, in Case 1420, sought approval of changes in the pool rules for the South Blanco-Tocito Oil Pool, together with other relief, including approval of the dual completion of the Caulkins Oil Company Well No. T-123 in such manner as to permit the production of gas from the Dakota formation and water injection in the Tocito formation. 2. The application was set for hearing before Commission Examiner E. J. Fischer on April 8, 1959, and after notice and hearing, the Commission entered its order No. R-1191-A approving and granting all matters set forth in the application, except that said order denied permission to dually complete said Well No. T-123 in such manner as to permit production from the Dakota formation and water injection in the Tocito formation, and in lieu thereof, approved the location of Well No. T-123 for Dakota production, with either dual completion for the production of gas from the Dakota and oil from the Tocito through parallel strings of tubing; or in the alternative, conversion of said well for water injection in the Tocito formation.

3. Dual completion of the Gaulkins Oil Company Well No. T-123 can be effected as proposed in the application in such manner as to allow production of gas from the Dakota formation and water injection in the Tocito formation without endangering any producing or other formation. Such dual completion can be effeciently and economically made either in the manner proposed upon the original hearing of this application, or in some other manner as may meet with approval of theCommission, is mechanically feasible, and will not result in waste, but will be in the interests of conservation and the prevention of waste, on which matters applicant proposes to offer testimony in the event the application is granted.

WHEREFORE, applicant prays that this application be set for rehearing before the Oil Conservation Commission of New Mexico in so far as Order No. R-1191-A denies authority to make a dual completion of the Caulkins Oil Company Well No. T-123 for production of gas from the Dakota formation and injection of

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Respectivity submitted, CAULKINS OIL COMPANY Cellahin and Attorneys for Applicant **P. O. Box** 1713 Santa Fe, New Mexico

2. The application was set for hearing before Commission Examiner E. J. Fischer on April 8, 1959, and after notice and hearing, the Commission entered its order No. R-1191-A approving and granting all matters set forth in the application, except that said order denied permission to dually complete said Well No. T-123 in such manner as to permit production from the Dakota formation and water injection in the Tocito formation, and in lieu thereof, approved the location of Well No. T-123 for Dakota production, with either dual completion for the production of gas from the Dakota and oil from the Tocito through parallel strings of tubing; or in the alternative, conversion of said well for water injection in the Tocito formation.

3. Dual completion of the Gaulkins Oil Company Well No. T-123 can be effected as proposed in the application in such manner as to allow production of gas from the Dakota formation and water injection in the Tocito formation without endangering any producing or other formation. Such dual completion can be effeciently and economically made either in the manner proposed upon the original hearing of this application, or in some other manner as may meet with approval of theCommission, is mechanically feasible, and will not result in waste, but will be in the interests of conservation and the prevention of waste, on which matters applicant proposes to offer testimony in the event the application is granted.

WHEREFORE, applicant prays that this application be set for rehearing before the Oil Conservation Commission of New Mexico in so far as Order No. R-1191-A denies authority to make a dual completion of the Caulkins Oil Company Well No. T-123 for production of gas from the Dakota formation and injection of

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water in the Tocito formation, and that after notice and hearing, de novo, as provided by law, said authority be granted, and that Order No. R-1191-A be in all other respects affirmed.

> Respectfully submitted, CAULKINS OIL COMPANY

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