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## BEFORE THE OIL CONSERVATION COMMISSION OF

THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF CITIES SERVICE OIL COMPANY FOR PERMISSION TO DUALLY COMPLETE ITS STATE "P" WELL NO. 3 FOR PRODUCTION OF OIL FROM THE BLINEBRY OIL POOL, AND THE PRODUCTION OF OIL FROM AN UNDESIGNATED GLORIETA OIL POOL, LEA COUNTY, NEW MEXICO.

Case No. 1557

## APPLICATION FOR DE NOVO HEARING

Comes now Cities Service Oil Company, and pursuant to the provisions of New Mexico Oil Conservation Commission Rule 1120, and as provided by Section 65-3-11.1, New Mexico Statutes Annotated, 1957 Supplement, applies for a hearing de novo before the Commission in the above captioned matter, and in support thereof would show:

- 1. That by application filed October 28, 1958, Cities Service Oil Company sought approval for the dual completion of its State "P" Well No. 3, located 990 feet from the South line and 990 feet from the West line of Section 32, Township 22 South, Range 38 East, N.M.P.M., Lea County, New Mexico, for the production of oil from the Blinebry formation in the Blinebry Oil Pool, and for the production of oil from the Glorieta formation in an undesignated oil pool.
- 2. That said application was heard as Case No. 1557 on the Commission's Docket, before Elvis A. Utz, Examiner, on November 19, 1958.

- 3. That by Order No. R-1296, entered November 28, 1958, the Commission denied said application.
- 4. That by its application, Cities Service Oil Company proposes to dually complete the said State "P" Well No. 3 in such a manner as to permit the production of oil from the Blinebry Oil Pool and the production of oil from an undesignated Glorieta oil pool through parallel strings of 2-inch tubing utilizing a dual-zone pump operated by a single rod string.
- 5. That such proposal is in the interests of conservation and the prevention of waste, and should be approved.

Wherefore applicant prays that this matter be set for de novo hearing before the Commission as provided by law and the rules and regulations of the Commission, and after notice and hearing as provided by law, said application be approved.

Respectfully submitted,
CITIES SERVICE OIL COMPANY

Kellahin and Fox Santa Fe, New Mexico

Attorneys for Applicant

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