

BEFORE THE OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF)
M. A. ROMERO AND ROBERT CRITCHFIELD)
REQUESTING THE OIL CONSERVATION COM-)
MISSION TO INVESTIGATE THE OPERATION)
OF GAS PRORATIONING IN THE BLANCO)
MESA VERDE POOL IN RIO ARRIBA COUNTY,)
NEW MEXICO, AND THE CHOZA MESA PIC-)
TURED CLIFF POOL IN RIO ARRIBA COUNTY,)
NEW MEXICO, AND TO ENTER SUCH ORDERS)
AS IT DEEMS NECESSARY, AFTER HEARING,)
TO REQUIRE RATABLE TAKING OF GAS FROM)
SAID POOLS AND TO OTHERWISE PROTECT)
CORRELATIVE RIGHTS OF OWNERS OF IN-)
TEREST IN SUCH POOLS.)

CASE NO. 1600

BILL OF PARTICULARS

Come now Applicants and for their Bill of Particulars state:

1. Applicants are the owners of equal interests in the fol-
lowing described properties:

(a) 5% overriding royalty and a 10% carried working interest
under

28N - 4W

Section 7 - Lots 1, 2, 3, 4 .
Section 8 - Lots 1, 2, 3, 4 .
Section 9 - Lots 1, 2, 3, 4 .
Section 16 - All
Section 17 - All
Section 18 - Lots 1, 2, 3, 4 .
Section 19 - Lots 1, 2, 3, 4 .
Section 20 - All
Section 21 - All
Section 28 - All
Section 29 - All
Section 30 - Lots 1, 2, 3, 4 .

(b) 5% of 7/8ths overriding royalty under

28N - 4W

Section 10 - Lots 1, 2, 3, 4
Section 11 - Lots 1, 2, 3, 4
Section 12 - Lots 1, 2, 3, 4
Section 13 - Lots 1, 2, 3, 4
Section 14 - All
Section 15 - All
Section 22 - All
Section 23 - All
Section 26 - All
Section 27 - All
Section 34 - All
Section 35 - All

29N - 4W

Section 20 - A11
Section 21 - A11
Section 22 - A11
Section 27 - A11
Section 28 - A11
Section 32 - S $\frac{1}{2}$, NE $\frac{1}{4}$

(c) 2 $\frac{1}{2}$ % of 7/8ths overriding royalty under

29N - 4W

Section 3 - A11
Section 4 - A11
Section 5 - A11
Section 6 - A11
Section 7 - A11
Section 8 - A11
Section 9 - A11
Section 10 - A11
Section 15 - A11
Section 16 - A11
Section 17 - A11
Section 18 - A11

2. The total number of wells in the Blanco Mesa Verde Pool is 1661. El Paso Natural Gas Co. is the operator of 956 wells and Pacific Northwest Pipeline Corp. is the operator of 208 wells. Together they operate 70% of the wells in the pool.

3. El Paso Natural Gas Co. and Pacific Northwest Pipeline Corp. are the major purchasers of gas from the pool and together purchase all gas in which applicants have an interest.

4. El Paso Natural Gas Co. was, at the outset, and Pacific Northwest Pipeline Corp. is now, operator of the 28-4 and the 29-4 Units in which applicants' property is situated.

5. El Paso Natural Gas Co. purchases gas from 11 wells in which applicants have an interest and Pacific Northwest Pipeline Corp. purchases gas from 6 wells in which applicants have an interest.

6. During 1958, El Paso Natural Gas Co. purchased 195940 mcf of gas from 11 wells and Pacific Northwest Pipeline Corp. purchased 242393 mcf of gas from 6 wells in Units 28-4 and 29-4, although total deliverability in wells from which El Paso Natural Gas purchased gas exceeded that in wells from which Pacific purchased gas.

7. During 1958, wells in 29-5 Unit in which Pacific Northwest Pipeline Corp. is purchaser, although of comparable deliverability, produced more gas than wells in which applicants have an interest.

8. During 1958, wells in 28-5 Unit in which El Paso Natural Gas Co. is purchaser, although of comparable deliverability, produced more gas than wells in which applicants have an interest in 28-4 or 29-4 Units.

9. During 1958, a number of wells in the Pool, with comparable deliverabilities, produced far in excess of wells in which applicants have an interest.

10. El Paso Natural Gas Co. and Pacific Northwest Pipeline Corp., as operators of Unit 28-4, have drilled 16 wells penetrating the Mesa Verde formation in the Mesa Verde Pool. Of these wells, only 7 have been completed in accordance with accepted practices in the pool with the result that applicants have been denied a proper deliverability test and proper deliverability as a factor in the allowable production under the proration formula established by Commission order. This has deprived applicants of their correlative right to production of gas from the pool.

11. El Paso Natural Gas Co. and Pacific Northwest Pipeline Corp., as operators of Unit 29-4, have drilled 11 wells penetrating the Mesa Verde formation in the Mesa Verde Pool. Of these wells, only 3 have been completed in accordance with accepted practices in the pool, with the result that applicants have been denied a proper deliverability test and proper deliverability as a factor in the allowable production under the proration established by Commission order. This has deprived applicants of their correlative right to production of gas from the pool.

12. El Paso Natural Gas Co. and Pacific Northwest Pipeline Corp., as operators of Units 28-4 and 29-4 and as purchasers from

said units, have failed to provide pipeline connections for 7 wells in said Units and have thus deprived applicants of their correlative right to production of gas from the pool.

13. El Paso Natural Gas Co. and Pacific Northwest Pipeline Corp., as purchasers of gas from Units 28-4 and 29-4, have maintained gas pipeline pressures at a level making it impossible for gas from these units to be delivered into the lines at a maximum rate and have thus deprived applicants of their correlative right to production of gas from the pool.

By this Bill of Particulars, Applicants do not limit the issues or the nature or extent of proof upon hearing on the application.

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