PAN AMERICAN PETROLEUM CORPORATION

OIL AND GAS BUILDING

FORT WORTH, TEXAS

December 3, 1959

GWK-5017-986.510.1 File:

Subject: Case No. 1828, N.M.O.C.C. Examiner Hearing Docket December 11, 1959, Application of Francis L. Harvey for Exception to Rule 104, Sections 10, 11, 21, 22, 23, and 33 of T-18-N, R-3-W, Sandoval County, New Mexico

New Mexico Oil Conservation Commission P. O. Box 871 Santa Fe, New Mexico

Attention: Mr. A. L. Porter, Jr.

Gentlemen:

Case 1828 is scheduled to be heard on the N.M.O.C.C. Examiner Hearing Docket for December 11, 1959. Applicant in this case is seeking an exception to Rule 104 of the Commission Rules and Regulations to permit $2\frac{1}{2}$ acre spacing for Mesaverde Oil Wells in Sections 10, 11, 21, 22, 23, and 33 of Township 18 North, Range 3 West, Sandoval County, New Mexico.

Regardless of the spacing established for this pool, Pan American Petroleum Corporation requests that the total allowable accruing to a 40 acre tract regardless of the number of wells completed thereon, be set no higher than the normal unit allowable for a regular 40 acre well.

It is respectfully requested that this statement of Pan Imerican's position be read into the record of the December 11, 1959 Hearing.

Very truly yours,

alex Clarks, fr:

RVC:1j



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Alex Clarke, Jr.

DIVISION ENGINEER