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August 15, 1960

Case file

New Mexico Oil Conservation Commission
State Capitol Building
Santa Fe, New Mexico

Attn: Mr. Oliver Payne, Legal Department

Subject: Application of Kay Kimball for Force-Pooling Order,
Case No. 2057

Gentlemen:

This is to advise you that I represent Robert L. Finch and Winnie Finch, of Bloomfield, New Mexico, who own the mineral rights to approximately 1.49 acres of land which is within the West 1/2 of Section 22, Township 29 North, Range 11 West, N.M.P.M, San Juan County, and therefore within the area affected by the application of Mr. Kimball for an order force-pooling all interests in said 320-acre tract under your Case No. 2057.

0.2 1/2 acre
We also represent John and Eloise Giacomelli, who own property within the 320 acres wherein the force-pooling order is sought. The Giacomellis own six residential lots in the town of Bloomfield, and within the force-pooling area.

Be advised that the Finches and the Giacomellis concur with the application for force-pooling of their tracts and have no objection to an order so providing being made by the Commission, providing, however, that my clients feel that they are entitled to monthly reports of production, at least until such time as the drilling costs are being paid out of production.

If the force-pooling order is entered, my clients wish now to make their determination that the drilling costs be paid out of production, provided these costs are reasonable and they feel that 125% of each owner's proportionate share of costs is a reasonable figure.

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It is felt that the drilling costs to be taken out of production, insofar as it affects my clients, should come only from 7/8 of their interests and should not affect the remaining 1/8 interest, and that my clients should receive remuneration monthly from said 1/8 of their 8/8 interest therein.

Very truly yours,

BROWN, WOOD & ROBERTS
Attorneys for Robert L. & Winnie Finch
Attorneys for John & Eloise Giacomelli

By

AER/v

cc: Mr. Robert Finch
Bloomfield, New Mexico

Mr. John Giacomelli
Bloomfield, New Mexico