WHITE AND RHODES ATTORNEYS AT LAW

JAMES G. WHITE

JERRY P. RHODES

ORVILLE C. MCCALLISTER, JR.

SUITE 207 SIMMS BUILDING

CHAPEL 2-0407

Governor John Burroughs, Chairman Cil Conservation Commission, State of New Mexico, Santa Fe, New Mexico.

PE: APPLICATION FOR AN ORDER FORCE-POOLING CERTAIN INTEREST IN A 320 ACRE GAS UNIT IN THE DAKOTA PRODUCING INTERVAL UNDESIGNATED, SAN JUAN COUNTY, NEW MEXICO.

Dear Sir:

The undersigned attoriey for Kay Kimbell, Operator, whose address is P. O. lox 1540, Fort Worth, Texas, hereby makes application to the Oil Conservation Commission for an order force-pooling certain interest in a 320 acre gas unit embracing the Dakota producing interval and in connection therewith submits the following:

1. The acreage embraced within the desired 320 acre unit is described as follows:

The West Half (W_2) of Section 22, Township 29 North, Range II West, N. M. P. M. , San Juan County, New Mexico.

2. The Oil Conservation Commission is requested to issue an order force-pooling all unleased minerals within the above described 320 acre unit, said unleased minerals and the ownership thereof being as follows:

Tract 1: That certain 1.49 acre tract conveyed by Joe Salmon to Winnie Finch, a widow and Robert T. Finch, by Warranty Deed dated May 14, 1957, and recorded in Book 360, Page 72 of the San Juan County, New Mexico Deed Records, described as follows:

Beginning at a point which is 803 feet North and 100 feet West of the center of Section 22, Twp. 29 N., Rge. 11 West, N. M. P. M.; thence West 316.3 feet; thence North 187 feet; thence East 316.8 feet; thence South 187 feet to the point of beginning. Owners, Winnie Finch and Robert T. Finch of Bloomfield, New Mexico.

- Tract 4: Lots 16 and 17, Block I, Bloomfield, New Mexico. Owners, Mrs. J. A. Johnson and Miss Jennie Kissel, 1060 Stomper Road, Fayetteville, North Carolina.
- Tract 5: Lots 26, 27 and 28, Block 2, Bloomfield Townsite Addition. Owners, John Giacomelli and wife, Eloise Giacomelli, Bloomfield, New Mexico.
- Tract 6: Lots 10, 11, 12, 13 and 14, Block 3, Bloomfield Townsite Addition. Owners, The Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter Day Saints, a Utah corporation; address in care of Vernon Snyder, Attorney at Law, Salt Lake City, Utah.
- Tract 9: Lot 14, Block 6, Bloomfield Townsite Addition. Owners, John Giacomelli and wife, Eloise Giacomelli, Bloomfield, New Mexico.
- 5. That reasonable efforts have been made to secure oil and gas mining leases on the unleased minerals and consent to pooling.
- 4. That the applicant's mineral ownership in the area makes it completely impractical to form a standard Dakota gas unit using acreage outside the above described 320 acre tract.
- 5. That the approval of the subject application will neither cause waste nor impair the correlative rights and denial of the application would tend to deprive the owners in said unit to recover their just and equitable share of the hydrocarbons under the 320 acre unit.
- 6. The following is a list of interested parties and their addresses:

Kay Kimbell, Operator, P. C. Box 1540, Fort Worth, —

Roy L. Cook, 212 Thatcher Building, Pueblo, _/Colorado.

El Paso Natural Gas Products Company, Company, Sox 1565, Farmington, New Mexico.

Winnie Finch and Robert T. Finch, Bloomfield, New Mexico.

Mrs. J. A. Johnson and Miss Jennie Kissel, 1060 Stomper Road, Fayetteville, North Carolina.

John Giacomelli and wife, Eloise Giacomelli, Taloomfield, New Mexico.

The Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter Day Saints, a Utah corporation, in care of Mr. Vernon Snyder, Attorney at Law, Salt Lake City, Utah.

Joe Salmon and Marion S. Salmon, his wife, Bloomfield, New Mexico.

Mr. Thomas F. Boettcher, 650 West Pierson, Phoenix, Arizona.

Mrs. Edward M. Reid, Jr., 12215 Southwest / Douglas, Portland 25, Oregon.

Richard Shiershka and Xemina Shiershke, 805 West Naomi Avenue, Arcadia, California,

W. L. Thurston and Mary L. S. Thurston, — 220 East Zia, Aztec, New Mexico.

Thomas R. McDaniel and Bertha A. McDaniel, Bloomfield, New Mexico.

C. C. Chaney and Myrta Chaney Box III, Bloomfield, New Nexico.

Manuel Madrid and Ophelia Madrid, Sloomfield, New Mexico.

Bruno C. Giovianini and Auvon A. Giovianini, Sloomfield, New Mexico.

M. L. Faverino and Mary Faverino; and Raymond Louisa, Bloomfield, New Mexico.

Miguel Velasquez and Adriana Velasquez, Bloomfield, New Mexico.

John Dallabetta and Rosi Dallabetta / Bloomfield, New Mexico Jack S. Webb, Mictoria B. Mebb and Dorothy Sullivan, 917 North Lincoln, Farmington, New Mexico.

William Faverino and Betty Faverino, — Bloomfield, New Mexico.

Eloy Gomez and Stella M. Gomez, Bloomfield, New Mexico.

Ernest Sategna and Louise A. Sategna, Bloomfield, New Mexico.

Margaret Dunn, Executrix of the Estate of John A. Wilmer, deceased, and Mary Ellen Wilmer, sole devisee of John A. Wilmer, deceased, care of Mr. E. Ellison Hatfield, Attorney at Law, Lee Building, Durango, Colorado.

Roy M. Jackson, Blanche E. Jackson, E. E. Jackson, Ruth Jackson, Lotta Jackson, Elizabeth Jackson, Ralph Jackson, Helen Putney, Dorothy Riekkola, Doris Beck, Roma Kuncl, Doris Somers, all in care of Mr. Roy M. Jackson, P. O. Box 476, Glenwood Springs, Colorado.

Harriet M. McClure, Bloomfield, New Mexico.

7. Applicant requests a hearing before the Commission at the earliest possible date.

Yours very truly,

WHITE and RHODES

Sy James G. White

Afterney for Kay Kimbell, Operator

JGW:mh

Dated August 3, 1960