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BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

In the Matter of the Application of J. GLENN TURNER for an Order to Force Pool the $S^{\frac{1}{2}}$ of Section 14, Township 29 North, Range 10 West, N.M.P.M., San Juan County, New Mexico.

case no. <u>II %</u>

APPLICATION

Comes now the applicant, J. GLENN TURNER, and states:

- 1. That he is the operator of a proposed communitized area, consisting of the $S^{\frac{1}{2}}$ of Section 14, Township 29 North, Range 10 West, N.M.P.M., San Juan County, New Mexico.
- 2. That the applicant contemplates drilling a test well in the Dakota Formation.
- 3. That the applicant contemplates that all of the working interest owners covering the area involved will execute the communitization agreement, with the exception of the owners of the $SW_{+}^{1}SW_{+}^{1}$ of said Section 14, whose names and addresses are as follows:

Saul A. Yager 902 Enterprise Building Tulsa 3, Oklahoma

Morris Mizel Kennedy Building Tulsa, Oklahoma

Sam Mizel
Enterprise Building
Tulsa 3, Oklahoma

M. E. Gimp 1919 East 30th place Tulsa, Oklahoma Mrs. Barbara Ann Witten 4631 North Garrison Tulsa, Oklahoma

- 4. That applicant has made numerous attempts to include the interests within the $SW^{\frac{1}{4}}SW^{\frac{1}{4}}$ of said Section 14 within the unit; however, the mineral interest owners have refused to join.
- 5. That the forced pooling order requested herein is necessary in order to prevent waste and to protect the correlative rights of the parties.

WHEREFORE, Applicant asks that this application be set down for hearing at an early date, that due notice thereof be given in accordance with the Rules of the Oil Conservation Commission of the State of New Mexico and the Laws of the State of New Mexico, and that after hearing and from the evidence, that this Commission enter its order to force pool the $S^{\frac{1}{2}}$ of Section 14, Township 29 North, Range 10 West, N.M.P.M., San Juan County, New Mexico; and the applicant further asks that this Commission enter its order permitting the applicant to produce from the full unit area and to take and receive all production had from the above described well until such time as he has been reimbursed in an amount equal to 125 per cent of his actual costs of drilling, completing, equipping and operating said well, plus a reasonable compensation for the supervision thereof.

Respectfully submitted,

J. GLENN TURNER By:

SETH, MONTGOMERY, FEDERICI & ANDREWS

By:

His Attorneys

Santa Fe, New Mexico.

Michael Market M