SETH, MONTGOMERY, FEDERICI & ANDREWS

ATTORNEYS AND COUNSELORS AT LAW 301 DON GASPAR AVENUE SANTA FE, NEW MEXICO

April 11, 1961

POST OFFICE BOX 828 TELEPHONE YU 3-7315

J. O. SETH A. K. MONTGOMERY OLIVER SETH WM. FEDERICI FRANK ANDREWS FRED C. HANNAHS GEORGE A. GRAHAM, JR.

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

Gentlemen:

Will you kindly enter our appearance as attorneys for Shell Oil Company in all hearings and continuances with reference to the attached application for amendment to Rule 1114.

There will be associated with us in this matter Mr. R. L. Hughston, Mr. James A. Lore, and other attorneys of the applicant, Shell Oil Company.

Very truly yours,

SETH, MONTGOMERY, FEDERICI & ANDREWS

By:

OS:CB

- Mar King. SETH, MONTGOMERY, FEDERICI & ANDREWS

J. O. SETH SET A. K. MONTGOMERY OLIVER SETH WM. FEDERICI FRANK ANDREWS FRED C. HANNAHS GEORGE A. GRAHAM, JR.

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

Gentlemen:

Enclosed with this letter is an application by Shell Oil Company for a hearing to consider possible changes to Rule 1114, and particularly to certain proposed changes in Form C-115.

It will be appreciated if you will consider this application.

Very truly yours,

M. Aut

OS:CB Enc.-l NEVILLE G. PENROSE, INC. Fair building Fort Worth 2, Texas

May 12, 1961

Mr. A. L. Porter New Mexico Oil Conservation Commission Box 871 Santa Fe, New Mexico

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Re: Case 2276

Gentlemen:

After studying the proposed forms recommended by Shell Oil Company to replace the present Form C-115, we note two major objections to this particular revision:

- 1. Our reports are manually computed and prepared by typewriter. For typewriter usage, the forms recommended by Shell would overcrowd the allotted information spaces. The necessary overcrowding of information would be difficult and time consuming, as well as being difficult to read.
- These forms would also involve more breakdown under the section entitled "Disposition of Oil". At present, this information is provided on the lower part of the C-115 as a summary and lease total. Under the new proposal, the way we interpret it, is that each well would have to have a breakdown of runs, storage, trucking, etc.

Our main objection is that this form would probably be suitable for anyone with data processing equipment, but for typewriter use, it would present problems.

We would appreciate your giving extensive thought in considering this matter before making any proposed revision in the present C-115.

Very truly yours,

Her &. Drice

Glenn G. Neill

GGN/ir