



# OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO  
P. O. BOX 2088 - SANTA FE  
87501



DIRECTOR  
JOE D. RAMEY

LAND COMMISSIONER  
PHIL R. LUCERO

STATE GEOLOGIST  
EMERY C. ARNOLD

October 25, 1976

Clerk of the District Court  
for San Juan County  
County Court House  
Farmington, New Mexico 87401

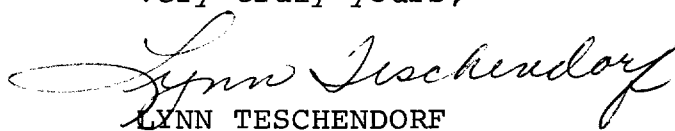
Re: New Mexico Oil Conservation  
Commission v. Benson-Montin-  
Greer Drilling Corporation

Dear Madam:

I am submitting the enclosed Complaint for filing in the above-captioned cause. Since I am filing this action on behalf of the State of New Mexico, I assume no filing fee is required. I would appreciate your returning the endorsed copies with the completed summonses.

Thank you for your assistance.

Very truly yours,

  
LYNN TESCHENDORF  
General Counsel

LT/jr

Enc.

IN THE DISTRICT COURT FOR SAN JUAN COUNTY

STATE OF NEW MEXICO

NEW MEXICO OIL CONSERVATION  
COMMISSION,

Plaintiff,

vs.

BENSON-MONTIN-GREER DRILLING  
CORPORATION,

Defendant.

No. \_\_\_\_\_

COMPLAINT

Plaintiff states that:

I

Plaintiff New Mexico Oil Conservation Commission is a duly organized agency of the State of New Mexico (hereinafter, "the Commission"); Defendant Benson-Montin-Greer Drilling Corporation is a corporation authorized to transact business in the State of New Mexico with its principal offices, place of business and residence in Farmington, San Juan County, New Mexico.

II

Defendant is the owner and operator of the Segal Well No. 1, located in Unit K of Section 10, Township 31 North, Range 13 West, NMPM, San Juan County, New Mexico.

III

Defendant has not filed annual packer-leakage tests as required by the provisions of the Commission's Administrative Order MC-1197, a copy of which is attached hereto as Exhibit "A" and by this reference is incorporated herein.

#### IV

Due to Defendant's failure to file said tests, the Commission set this matter for hearing to allow Defendant and all other interested parties to appear and show cause why this well should not be plugged and abandoned.

#### V

Defendant received proper notice of the hearing, but did not appear.

#### VI

Pursuant to said hearing held September 18, 1974, Oil Conservation Commission Order No. R-4872 was issued which required that Defendant take and report a packer-leakage test on or before December 15, 1974, and that Defendant either recomplete said well as a single completion or plug and abandon said well; in the event the well was plugged, Defendant was required to obtain a Commission-approved program for plugging and abandoning. A copy of said Order is attached hereto as Exhibit "B" and by this reference is incorporated herein.

#### VII

On or about August 25, 1976, the Commission notified Defendant that, unless compliance was made with said Order by October 1, 1976, the Commission would file suit seeking appropriate fines.

#### VIII

Defendant has not complied with and has been in knowing and willful violation of said Order each and every day since December 15, 1974.

#### IX

N.M.S.A. Sections 65-3-24 and 65-3-27, 1953 Comp., provide that an action may be instituted by the Commission to obtain a

mandatory injunction for compliance with its orders, and to recover a penalty of not to exceed one thousand (\$1,000.00) dollars a day for each and every violation of its rules, regulations or orders.


WHEREFORE, Plaintiff prays the Court as follows:

1. Plaintiff prays for a mandatory injunction requiring Defendant to comply with its Order No. R-4872.

2. Plaintiff prays for judgment against Defendant in an amount not to exceed one thousand (\$1,000.00) dollars for each day from December 15, 1974, until the date of judgment, said amount to be paid into the State Treasury as provided for in Article VII, Section 4, of the Constitution of the State of New Mexico, plus costs.

3. Plaintiff prays for such further relief as the Court deems just and proper.

TONEY ANAYA  
Attorney General

By   
LYNN TESCHENDORF  
Assistant Attorney General  
New Mexico Oil Conservation Commission  
P. O. Box 2088  
Santa Fe, New Mexico 87501

THE APPLICATION OF CONSOLIDATED OIL  
& GAS, INC., FOR PERMISSION TO EFFECT  
DUAL COMPLETION OF ITS SEGAL WELL NO.  
1-10 LOCATED IN THE NE/4 SW/4 OF SECTION  
10, TOWNSHIP 31 NORTH, RANGE 13 WEST,  
NMPM, SAN JUAN COUNTY, NEW MEXICO, IN SUCH  
A MANNER AS TO PERMIT THE PRODUCTION OF  
GAS FROM THE BLANCO-MESAVERDE POOL AND THE  
PRODUCTION OF GAS FROM THE BASIN-DAKOTA  
POOL.

ORDER NO. MC-1197

ADMINISTRATIVE ORDER  
OF THE OIL CONSERVATION COMMISSION

Under the provisions of Rule 112-A, Consolidated Oil & Gas, Inc., made application to the New Mexico Oil Conservation Commission on May 31, 1962, for permission to dually complete its Segal Well No. 1-10 located in the NE/4 SW/4 of Section 10, Township 31 North, Range 13 West, NMPM, San Juan County, New Mexico, in such a manner as to permit the production of gas from the Blanco-Mesaverde Pool and the production of gas from the Basin-Dakota Pool.

Now, on this 20th day of June, 1962, the Secretary-Director finds:

- (1) That application has been duly filed under the provisions of Rule 112-A of the Commission's Rules and Regulations;
- (2) That satisfactory information has been provided that all operators of offset acreage have been duly notified; and
- (3) That no objections have been received within the waiting period as prescribed by said rule.
- (4) That the proposed dual completion will not cause waste nor impair correlative rights.
- (5) That the mechanics of the proposed dual completion are feasible and consonant with good conservation practices.

IT IS THEREFORE ORDERED:

That the applicant herein, Consolidated Oil & Gas, Inc., be and the same is hereby authorized to dually complete its Segal Well No. 1-10 located in the NE/4 SW/4 of Section 10, Township 31 North, Range 13 West, NMPM, San Juan County, New Mexico, in such a manner as to permit the production of gas from the Blanco-Mesaverde Pool and the production of gas from the Basin-Dakota Pool through parallel strings of tubing.

PROVIDED HOWEVER, That applicant shall complete, operate, and produce said well in accordance with the provisions of Rule 112-A.

*Exhibit "A"*

Order No. MC-1197

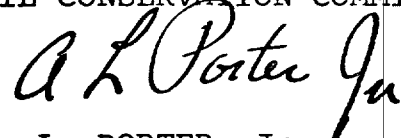
-2-

PROVIDED FURTHER, That applicant shall take packer-leakage tests upon completion and annually thereafter during the Annual Deliverability Test Period for the Basin-Dakota Pool.

IT IS FURTHER ORDERED: That jurisdiction of this cause is hereby retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year herein-above designated.

STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION

A handwritten signature in cursive script, reading "A L Porter Jr", written over the typed name.

A. L. PORTER, Jr.,  
Secretary-Director

S E A L

BEFORE THE OIL CONSERVATION COMMISSION  
OF THE STATE OF NEW MEXICO

*Exhibit "B"*

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION OF NEW MEXICO FOR  
THE PURPOSE OF CONSIDERING:

CASE NO. 5316  
Order No. R-4872

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION COMMISSION  
ON ITS OWN MOTION TO PERMIT BENSON-  
MONTIN-GREER DRILLING CORPORATION  
AND HARTFORD ACCIDENT AND INDEMNITY  
COMPANY AND ALL OTHER INTERESTED  
PARTIES TO APPEAR AND SHOW CAUSE WHY  
THE SEGAL NO. 1, LOCATED IN UNIT K  
OF SECTION 10, TOWNSHIP 31 NORTH,  
RANGE 13 WEST, NMPM, SAN JUAN COUNTY,  
NEW MEXICO, SHOULD NOT BE PLUGGED AND  
ABANDONED IN ACCORDANCE WITH A  
COMMISSION-APPROVED PLUGGING PROGRAM.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on September 18, 1974, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this 22nd day of October, 1974, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises.

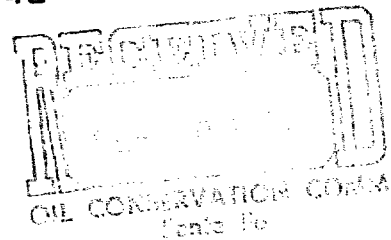
FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That Benson-Montin-Greer Drilling Corporation is the owner and operator of its Segal Well No. 1, located in Unit K of Section 10, Township 31 North, Range 13 West, NMPM, San Juan County, New Mexico.
- (3) That said well is a dually completed gas well in the Blanco-Mesaverde and Basin-Dakota Pools as authorized by Administrative Order MC-1197.
- (4) That the operator has not filed annual packer-leakage tests with the Commission's Aztec District Office as required under the provisions of said Order.
- (5) That the operator should be given approximately 60 days in which to take and report a packer-leakage test and either recomplete said well as a single zone completion or plug and abandon said well in accordance with a Commission-approved

# OIL CONSERVATION COMMISSION

HOBBS, NEW MEXICO 88240

September 6, 1973



C  
O  
P  
Y  
  
Western States Equipment Co.  
P. O. Box 1229  
Midland, Texas 79701

Gentlemen:

We have written to you on two separate occasions, March 27, 1973 and July 19, 1973, regarding the plugging and abandoning of your Hutcherson Com No. 1 located in Unit C of Section 27, T-9-S, R-34-E. To date we have had no reply.

Since you apparently plan to ignore our requests for information on this well, we have no alternative but to call a show cause hearing as to why the well should not be plugged and abandoned, and by copy of this letter we are so advising Mr. William F. Carr, attorney for the Oil Conservation Commission.

Yours very truly,

OIL CONSERVATION COMMISSION

Joe D. Ramey  
Supervisor, District 1

mc

cc-Mr. William F. Carr, attorney  
Oil Conservation Commission ✓  
Santa Fe, New Mexico  
Attach.



# OIL CONSERVATION COMMISSION

HOBBS, NEW MEXICO 88240

July 19, 1973

C  
O  
P  
Y  
Western States Equipment Co.  
Box 1229  
Midland, Texas 79701

Gentlemen:

On March 27, 1973, we wrote you concerning your Hutcherson Com Well No. 1 located in Unit C of Section 27, T-9-S, R-34-E. In this letter we asked that you please immediately submit Form C-103 outlining the work done in plugging and abandoning the well and if it has not been plugged, to please indicate the present status.

You have chosen to ignore our request.

Please submit the necessary Form C-103 so that it will not be necessary for us to take further action in this matter. If you intend to plug this well in the very near future, please so notify this office prior to plugging.

Yours very truly,

OIL CONSERVATION COMMISSION

Joe D. Ramey  
Supervisor, District 1

JDR/mc

**OIL CONSERVATION COMMISSION**

**HOBBS, NEW MEXICO 88240**

**March 27, 1973**

Western States Equipment Co.  
Box 1229  
Midland, Texas 79701

Gentlemen:

On August 16, 1971, this office approved a Notice of Intent to Plug for the Hutcherson Com No. 1 located in Unit C of Section 27, T-9-S, R-34-E. No further reports have been submitted.

Please immediately submit Form C-103 outlining the work done in plugging and abandoning the well; if it has not been plugged, please indicate the present status.

Yours very truly,

OIL CONSERVATION COMMISSION

Joe D. Ramey  
Supervisor, District 1

mc

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O  
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Y