CAMPBELL & BLACK, P.A.

LAWYER

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN WILLIAM P. SLATTERY ANNIE-LAURIE COOGAN

HAND-DELIVERED

JEFFERSON PLACE SUITE I - 110 NORTH GUADALUPE POST OFFICE BOX 2208 SANTA FE, NEW MEXICO 87504-2208 TELEPHONE: (505) 988-4421 TELECOPIER: (505) 983-6043

June 24, 1991

Case 10353 RECEIVED

JUE 24 1901

OIL CONSERVATION DIVISION

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

Re: In the Matter of the Application of Collins & Ware, Inc. for Compulsory Pooling, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Collins & Ware, Inc. in the above-referenced case. Collins & Ware, Inc. respectfully requests that this matter be placed on the docket for the July 25, 1991 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosure cc w/enclosure: Mr. Bill Seltzer

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

JUN 2 4 1991

IN THE MATTER OF THE APPLICATION OF COLLINS & WARE, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 10353

APPLICATION

COLLINS & WARE, INC., through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat.Ann. § 70-2-17, (1978), for an order pooling all of the mineral interests in all formations developed on 320-acre spacing in the W/2 of Section 20, Township 22 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and in support thereof states:

1. Applicant owns or represents approximately 50% of the working interest in and under the W/2 of Section 20, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced spacing or proration unit to a well to be drilled at a standard location 1980 feet from the North line and 660 feet from the West line of said Section 20, to a depth of approximately 15,300 feet to test all formations to the base of the Morrow formation.

3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the W/2 of said Section 20, except for Chevron U.S.A. Inc., Post Office Box 1150, Midland, Texas 79702, the owner of a 50% working interest.

4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before an Examiner of the Oil Conservation Division on July 25, 1991 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

Bv:

WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR COLLINS & WARE, INC.

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

JUN 24 1991

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CASE NO. 10353

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1. Applicant owns or represents approximately 50% of the working interest in and under the W/2 of Section 20, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced spacing or proration unit to a well to be drilled at a standard location 1980 feet from the North line and 660 feet from the West line of said Section 20, to a depth of approximately 15,300 feet to test all formations to the base of the Morrow formation.

3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the W/2 of said Section 20, except for Chevron U.S.A. Inc., Post Office Box 1150, Midland, Texas 79702, the owner of a 50% working interest.

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Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR COLLINS & WARE, INC.

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES RECEIVED

JUN 2 1951

IN THE MATTER OF THE APPLICATION OF COLLINS & WARE, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE NO. 10353

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1. Applicant owns or represents approximately 50% of the working interest in and under the W/2 of Section 20, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced spacing or proration unit to a well to be drilled at a standard location 1980 feet from the North line and 660 feet from the West line of said Section 20, to a depth of approximately 15,300 feet to test all formations to the base of the Morrow formation.

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Respectfully submitted,

CAMPBELL & BLACK, P.A.

By: '

WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR COLLINS & WARE, INC.