# CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

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November 12, 1991

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### **HAND-DELIVERED**

RECEIVED NOV 12 1991

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

OIL CONSERVATION DIV. SANTA FE

In the Matter of the Application of MW Petroleum Corporation/Apache Corporation for an Unorthodox Gas Well Location, Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of MW Petroleum Corporation/Apache Corporation in the above-referenced case. MW Petroleum Corporation/Apache Corporation respectfully requests that this matter be placed on the docket for the December 5, 1991 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:mlh **Enclosures** 

cc w/enclosures:

Ms. Ceci Leonard

Senior Staff Reservoir Engineer MW Petroleum Corporation 500 City West Blvd., Suite 400

Houston, Texas 77042

#### BEFORE THE

### OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF MW PETROLEUM CORPORATION/APACHE CORPORATION FOR AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO. NOV 1 2 1991

OIL CONSERVATION DIV.

CASE NOTA FE /6423

## **APPLICATION**

COMES NOW MW PETROLEUM CORPORATION/APACHE CORPORATION, through its undersigned attorneys, hereby makes application to the Oil Conservation Division for approval of an unorthodox well location and in support of this application states:

- 1. Applicant is the operator of Section 13, Township 22 South, Range 23 East, N.M.P.M., Eddy County, New Mexico, and proposes to drill a well at an unorthodox location 330 feet from the North and West lines of said Section 13 to test the Pennsylvanian formation, Indian Basin-Upper Pennsylvanian Gas Pool.
- 2. Applicant seeks an exception to the well location requirements of Rule 2 (B) of the Special Rules and Regulations for the Indian Basin-Upper Pennsylvanian Gas Pool to permit the drilling of its HOC Fed. Com Well No. 3 at the above-described unorthodox location.
- 3. Approval of this application will afford applicant the opportunity to produce its just and equitable share of hydrocarbons underlying this spacing unit and will otherwise

be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant requests that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on December 5, 1991 and, that after notice and hearing as required by law, the Division enter its Order granting this application and providing such other relief as is proper.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

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ATTORNEYS MW PETROLEUM CORPORATION/ APACHE CORPORATION

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