7 m CSSLD Mars to Dillo CAMPBELL, CARR, BERGE & SHERIDAN, P.A. LAWYERS JEFFERSON PLACE MICHAEL B. CAMPBELL WILLIAM F. CARR SUITE I - 110 NORTH GUADALUPE BRADFORD C BERGE POST OFFICE BOX 2208 MARK F. SHERIDAN SANTA FE, NEW MEXICO 87504-2208 WILLIAM P. SLATTERY TELEPHONE: (505) 988-4421 PATRICIA A. MATTHEWS TELECOPIER: (505) 983-6043 MICHAEL H. FELDEWERT JACK M. CAMPBELL OF COUNSEL ġ 5 July 28, 1992 RECEIVED JUI 2 & 1992 HAND-DELIVERED OIL CONSERVATION DIVISION William J. LeMay, Director 7 Oil Conservation Division New Mexico Department of Energy, 10533 Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

Re: In the Matter of the Application of BTA Oil Producers for an Unorthodox Location and Directional Drilling, Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of BTA Oil Producers in the above-referenced case. BTA Oil Producers respectfully requests that this matter be placed on the docket for the August 20, 1992 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:sg Enclosures cc w/enclosure:

Mr. Keith Logan BTA Oil Producers 104 S. Pecos Midland, Texas 79701

RECEIVED

BEFORE THE

OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISION

JUL 2 8 1992

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF BTA OIL PRODUCERS FOR AN UNORTHODOX LOCATION AND DIRECTIONAL DRILLING, EDDY COUNTY, NEW MEXICO.

CASE NO. _/(533

APPLICATION

BTA OIL PRODUCERS, by its undersigned attorneys, hereby make application to the New Mexico Oil Conservation Division for approval of an unorthodox oil well location, and for directional drilling, and in support of this application states:

1. Applicant is the operator of Section 20, Township 22 South, Range 23 East, N.M.P.M., Eddy County, New Mexico which is a standard spacing or proration unit in the Indian Basin-Upper Penn Gas Pool dedicated to the BTA 9201 JVP Indian No. 1-Y Well at a surface location 1650 feet from the North and East Lines of said Section 20.

2. The BTA 9201 JVP Indian No. 1-Y Well is not a commercial success and Applicant proposes to utilize the existing wellbore to directionally drill this well to a new unorthodox bottomhole location within 50 feet of a point 1300 feet from the North and East lines of said Section 20 in the Indian Basin-Upper Penn Gas Pool.

3. Applicant seeks an exception to Rule 4 of the Special Pool Rules and Regulations for the Indian Basin-Upper Penn Gas Pool to permit the drilling of this well to the above described bottomhole location.

4. Applicant also seeks an exception to Division General Rule 111 to permit

it to directionally drill this well to the proposed bottomhole location.

5. Approval of this location 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 respectfully requests that this matter be set for hearing before a duly appointed Examiner of the Oil Conservation Division of August 20, 1992, 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.

Bv:

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

ATTORNEYS FOR BTA OIL PRODUCERS

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