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## VIA HAND DELIVERY

Florene Davidson Oil Conservation Division State Land Office Building Santa Fe, New Mexico 87503

Dear Florene:

(ase 10635

NGY 1 - 19-49

RECEIVED

QIL CONSERVATION DIVISION

Enclosed for filing are an original and two copies of two Applications filed by Mewbourne Oil Company for compulsory pooling and an unorthodox well location. Please set both Applications for the December 17 hearing. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

& HENSLEY

√ames Bruce

JB:frs Enclosures

#### BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING AND AN UNORTHO-DOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.

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APPLICATION OIL CONSERVATION DIVISION

Block to the

Mewbourne Oil Company hereby makes application for an order pooling all mineral interests from the base of the San Andres formation to the base of the Morrow formation underlying the  $E_2^1$  of Section 15, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, for an unorthodox gas well location, and in support thereof states:

- Applicant is an interest owner and has the right to drill a well in the E1 of said Section 15.
- Applicant proposes to drill its Turkey Track "15" State No. 2 Well in the E1 of Section 15, at an unorthodox location 1,500 feet from the South line and 1,980 feet from the East line of the Section, to a depth sufficient to test the Morrow formation (approximately 11,000 feet), and seeks to dedicate the following acreage to the well:
- (a) The  $E_2^1$  of Section 15 for all pools or formations spaced on 320 acres;
- The SE<sup>1</sup> of Section 15 for all pools or formations spaced on 160 acres;
- The W\(^1\_2\)SE\(^1\_4\) of Section 15 for all pools or formations (if any) spaced on 80 acres; and

- (d) The NW $\S$ SE $\S$  of Section 15 for all pools or formations spaced on 40 acres.
- 3. Applicant has in good faith sought to join all other mineral or leasehold interest owners in the  $E^1_{\overline{2}}$  of Section 15 for the purposes set forth herein.
- 4. Although Applicant attempted to obtain voluntary agreements from all mineral or leasehold interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their acreage. Therefore, Applicant seeks an order pooling all mineral and leasehold interest owners underlying the E½ of Section 15, as described above, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).
- 5. Applicant requests the Division to consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating charges and costs charged for supervision. Applicant requests that it ge designated as operator of the well and that the Division set a penalty of 200% for the risk involved in drilling the well.
- 6. The pooling of all interests underlying the  $E_2^{\frac{1}{2}}$  of Section 15, as described above, and the approval of the unorthodox gas well location will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that the Division grant the relief requested above.

Dated: November 16, 1992.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

Attorneys for Applicant

### EXHIBIT A

# Turkey Track "15" State No. 2 Well

Devon Energy Partners, Ltd. Devon Energy Corporation Suite 1500 20 North Broadway Oklahoma City, Oklahoma 73102 Attention: Keith Brewer

Lewis Dreyfus Gas Holdings, Inc. Suite 600 1400 Quail Springs Parkway Oklahoma City, Oklahoma 73134 Attention: Rusty Waters

Marathon Oil Company Post Office Box 552 Midland, Texas 79702

Attention: Randal P. Wilson