

BEFORE THE  
OIL CONSERVATION DIVISION  
NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SEELY OIL COMPANY  
FOR STATUTORY UNITIZATION,  
LEA COUNTY, NEW MEXICO.

CASE NO. 10647

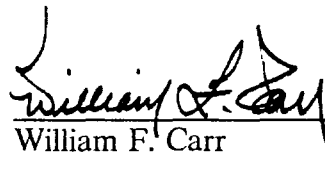
APPLICATION OF SEELY OIL COMPANY  
FOR APPROVAL OF A WATERFLOOD  
PROJECT AND QUALIFICATION  
FOR THE RECOVERED OIL TAX RATE,  
LEA COUNTY, NEW MEXICO.

CASE NO. 10648

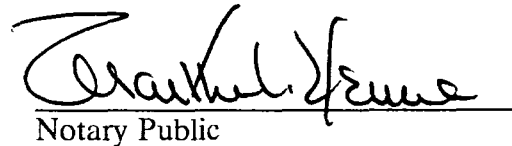
AFFIDAVIT OF MAILING

William F. Carr, being duly sworn, states that on November 25, 1992 he provided notice of the above referenced applications by certified mail, return receipt requested, to the persons identified on Exhibit "A" attached hereto in compliance with the provisions of the rules and regulations of the Oil Conservation Division.

Further Affiant sayeth naught.

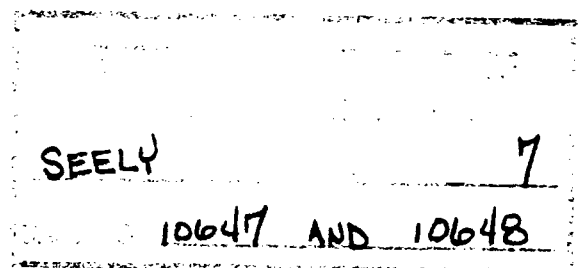
  
William F. Carr

SUBSCRIBED AND SWORN to before me this 17th day of March, 1993.

  
Notary Public

My Commission Expires:

August 19, 1995



## EXHIBIT A

Ray Westall  
Box 4  
Loco Hills, New Mexico 88255

ORYX Energy Company  
Box 1861  
Midland, TX 79703

Amoco Production Company  
Post Office Box 3092  
Houston, TX 77253  
Attn: Dan Janik

OXY USA, Inc.  
Post Office Box 50250  
Midland, TX 79710  
Attn: Scott Gengler

Meridian Oil, Inc.  
801 Cherry Street, Suite 700  
Fort Worth, TX 76102

Maralo Inc.  
223 West Wall, 9th Floor  
Midland, TX 79702

JFG Enterprises  
Box 100  
Artesia, NM 88211-0100

Chevron USA Inc.  
Permian Basin Production  
Business Unit  
Post Office Box 1150  
Midland, TX 79702

Collins & Ware  
Box 2443  
Roswell, NM 88202-2443

Marathon Oil Company  
P. O. Box 552  
Midland, TX 79702  
Attn: Tom Hill

Bass Enterprises Production Co.  
201 Main Street, Suite 3100  
Fort Worth, TX 76102

Patricia Dean Boswell, Trustee  
1320 Lake Street  
Fort Worth, TX 76102

Santa Fe Exploration Company  
Post Office Box 1136  
Roswell, NM 88202

J. Cleo Thompson & James  
Cleo Thompson, Jr., a Ptr.  
325 N. St. Paul, Suite 4500  
Dallas, TX 75201-3993

Mobil Producing  
Box 633  
Midland, TX 79702

John P. Oil Company  
1320 Lake Street  
Fort Worth, TX 76102

C.E.B. Oil Company  
1320 Lake Street  
Fort Worth, TX 76102

E.A.B. Oil Company  
1320 Lake Street  
Fort Worth, TX 76102

P.V.B. Oil Company  
1320 Lake Street  
Fort Worth, TX 76102

Houston & Emma Hill Tr. Est.  
500 Throckmorton, Suite 2803  
Fort Worth, TX 76102

Wes-Tex Drilling Company  
P. O. Box 3739  
Abilene, TX 79604

Express Air Drilling, Inc.  
2 Turtle Creek Village,  
Suite 1525  
Dallas, TX 75219

Northbrook Business Center  
506 Fort Worth Club Bldg.  
Fort Worth, TX 76102

Burnett Oil Company  
801 Cherry Street, Suite 1500  
Fort Worth, TX 76102

Merlyn W. Dahlin and wife,  
Ruth G. Dahlin  
3220 North Freeway  
Fort Worth, TX 76111

Charles P. Davis and wife,  
Shirley A. Davis  
1307 8th Ave., Suite 308  
Fort Worth, TX 76104

David L. Henderson and wife,  
Dawn Henderson  
815 W. 10th Street  
Fort Worth, TX 76102

Michael J. Havel and wife,  
Kathleen A. Havel  
7607 Chalkstone  
Dallas, TX 75248

C.W. Stumhoffer and wife,  
Frieda T. Stumhoffer  
1007 Ridglea Bank Bldg.  
Fort Worth, TX 76116

C. W. Seely and wife,  
Ina B. Seely  
815 W. 10th Street  
Fort Worth, TX 76102

Frances Buckler  
1809 Aden Road  
Fort Worth, TX 76116

Roger W. Moore  
8504 Fairway Drive  
Fort Worth, TX 76116

J. C. Maddux  
1012 Ridglea Bank Bldg.  
Fort Worth, TX 76116

Thomas J. Maddux  
1012 Ridglea Bank Bldg.  
Fort Worth, TX 76116

Bill M. Scales and wife,  
Mary T. Scales  
500 Throckmorton, Suite 2803  
Fort Worth, TX 76102

Marc H. Lowrance Jr., and wife  
Mary Anne Lowrance  
Post Office Box 9016  
Fort Worth, TX 76147

Amoco Production Company  
Post Office Box 591  
Tulsa, Oklahoma 74102

Bradley A. Pomeroy  
7514 East Hinsdale Avenue  
Englewood, CO 80112

Thomas R. Smith  
1505 S. CR 1130  
Midland, TX 79701

Hamon Operating Company  
8411 Preston Rd., Suite 800  
LB 33  
Dallas, TX 75225

John Saleh  
502 North 1st Street  
Lamesa, TX 79331

State of New Mexico  
Commissioner of Public Lands  
Post Office Box 1148  
Santa Fe, NM 87504-1148

Linda W. Smith  
Post Office Box 8974  
Midland, TX 79701

Santa Fe Natural Resources, Inc.  
Post Office Box 4  
Loco Hills, New Mexico 88255

Windell A. Thomason  
Post Office Box 411  
Midland, TX 79702-0411

Pogo Producing Company  
Post Office Box 10340  
Midland, TX 79702-7340

David S. Googins, Jr.  
Post Office Box 2591  
Midland, TX 79702-2591

George Weis  
3300 "B" Moss Ct.  
Midland, TX 79707-3644

Bobby Hicks  
3306 Andrews Hwy.  
Midland, TX 79703-5131

Dwight A. Free, Jr.  
4356 Edmondson  
Dallas, TX 75205

John E. Casey  
Post Office Box 10533  
Midland, TX 79702

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

MICHAEL B. CAMPBELL  
WILLIAM F. CARR  
BRADFORD C. BERGE  
MARK F. SHERIDAN  
WILLIAM P. SLATTERY

PATRICIA A. MATTHEWS  
MICHAEL H. FELDEWERT

JACK M. CAMPBELL  
OF COUNSEL

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

November 25, 1992

JEFFERSON PLACE  
SUITE 1 - 110 NORTH GUADALUPE  
POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
TELECOPIER: (505) 983-6043

TO ALL LEASEHOLD OPERATORS WITHIN ONE-HALF MILE OF EACH  
PROPOSED INJECTION WELL AND THE OWNER OF THE SURFACE ON WHICH  
EACH PROPOSED INJECTION WELL WILL BE LOCATED IN THE CENTRAL EK  
QUEEN UNIT AREA

Re: Application of Seely Oil Company for Approval of a Waterflood Project, Lea  
County, New Mexico

Gentlemen:

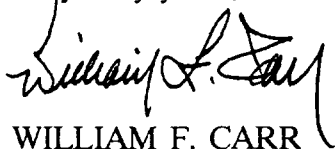
This letter is to advise you that Seely Oil Company has filed an application with the New Mexico Oil Conservation Division seeking authority to institute a waterflood project by injection of water into the Yates, Seven Rivers and Queen formations, EK-Yates Seven Rivers-Queen Unit which is described on Exhibit A hereto.

Attached for your information is a copy of the application filed by Seely Oil Company on OCD Form C-108. All attachments required by this Division Form are attached for your information.

This application has been set for hearing before an Examiner of the Oil Conservation Division on December 17, 1992. As an owner of an interest who may be affected by this application, you may appear at that hearing and present testimony. Failure to appear at that time or otherwise become a party of record will preclude you from challenging this application at a later date.

Parties appearing in cases have been requested by the Division (Memorandum 2-90) to file a Prehearing Statement substantially in the form prescribed by the Division. Prehearing statements should be filed by 4:00 o'clock p.m. on the Friday before a scheduled hearing.

Very truly yours,



WILLIAM F. CARR  
ATTORNEY FOR SEELY OIL COMPANY  
Enclosure

**Township 18 South, Range 33 East, N.M.P.M.**

Section 12: SE/4 NE/4; E/2 SE/4

**Township 18 South, Range 34 East, N.M.P.M.**

Section 7: S/2, S/2 NW/4, SW/4 NE/4

Section 8: SW/4, S/2 SE/4

Section 9: W/2 SW/4

Section 16: NW/4 NW/4

Section 17: N/2 N/2

Section 18: N/2 NE/4

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

MICHAEL B. CAMPBELL  
WILLIAM F. CARR  
BRADFORD C. BERGE  
MARK F. SHERIDAN  
WILLIAM P. SLATTERY

PATRICIA A. MATTHEWS  
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JEFFERSON PLACE  
SUITE 1 - 110 NORTH GUADALUPE  
POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
TELECOPIER: (505) 983-6043

November 25, 1992

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

TO ALL WORKING INTEREST OWNERS AND ROYALTY INTEREST OWNERS  
IN THE CENTRAL EK QUEEN UNIT AREA

Re: Application of Seely Oil Company for Statutory Unitization, Lea County,  
New Mexico

Gentlemen:

This letter is to advise you that Seely Oil Company has filed an application with the New Mexico Oil Conservation Division seeking an order statutorily unitizing for the purpose of establishing a secondary recovery project, all mineral interests in the Yates, Seven Rivers and Queen formations, EK-Yates-Seven Rivers-Queen Pool, underlying 1148.40 acres, more or less, of State lands in portions of Township 18 South, Ranges 33 and 34 East. Said unit is to be designated the Central EK Queen Unit. Among the matters to be considered at the hearing on this application will be the necessity of unit operations; the designation of a unit operator; the determination of the fair reasonable, and equitable allocation of production and costs of production, including capital investment, to each of the various tracts in the unit area; the determination of credits and charges to be made among the various owners in the unit area for their investment in wells and equipment; and such other matters as may be necessary and appropriate for carrying on efficient unit operations; including but not limited to, unit voting procedures, selection, removal or substitution of unit operator, and time of commencement and termination of unit operations. Attached hereto as Exhibit A is a description of the lands to be included in the proposed unit.

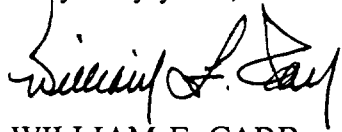
This application has been set for hearing before an Examiner of the Oil Conservation Division on December 17, 1992. You are not required to attend this hearing but, as an owner of an interest that may be affected by this application, you may appear at that hearing and present testimony. Failure to appear at that time or otherwise become a party of record will preclude you from challenging this application at a later date.

November 25, 1992

Page 2

Parties appearing in cases have been requested by the Division (Memorandum 2-90) to file a Prehearing Statement substantially in the form prescribed by the Division. Prehearing statements should be filed by 4:00 o'clock p.m. on the Friday before a scheduled hearing.

Very truly yours,

A handwritten signature in black ink, appearing to read "William F. Carr". The signature is fluid and cursive, with a large initial "W" and a stylized "C".

WILLIAM F. CARR  
ATTORNEY FOR SEELY OIL COMPANY  
Enclosure

**Township 18 South, Range 33 East, N.M.P.M.**

Section 12: SE/4 NE/4; E/2 SE/4

**Township 18 South, Range 34 East, N.M.P.M.**

Section 7: S/2, S/2 NW/4, SW/4 NE/4

Section 8: SW/4, S/2 SE/4

Section 9: W/2 SW/4

Section 16: NW/4 NW/4

Section 17: N/2 N/2

Section 18: N/2 NE/4