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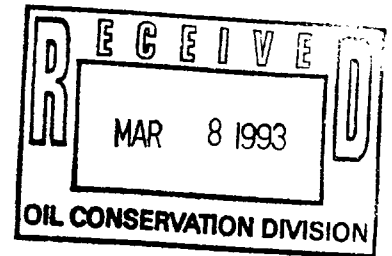
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March 8, 1993

HAND-DELIVERED

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



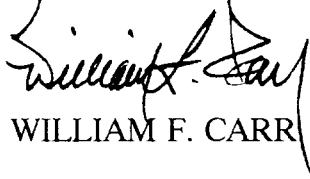
10706

Re: In the Matter of the Application of Richardson Operating Company for
Compulsory Pooling, San Juan County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Richardson Operating Company in the above-referenced case. Richardson Operating Company respectfully request that this matter be placed on the docket for the April 8, 1993 Examiner hearings.

Very truly yours,

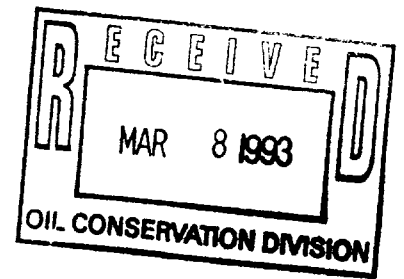

WILLIAM F. CARR

WFC:mlh

Enclosures

cc w/enclosures: Mr. Pete Gowan

BEFORE THE
OIL CONSERVATION DIVISION



NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION
OF RICHARDSON OPERATING COMPANY
FOR COMPULSORY POOLING,
SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 10706

APPLICATION

RICHARDSON OPERATING COMPANY, 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 the N/2 of Section 15, Township 29 North, Range 12 West, N.M.P.M., San Juan County, New Mexico, and in support thereof states:

1. Applicant owns or represents approximately 75% of the working interest in and under the N/2 of Section 15, and Applicant has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced spacing unit to its Ropco Fee 15-2 FC Well located at an orthodox location 1845 feet from the North line and 1405 feet from the East line of Section 15 which will test the Fruitland formation, Basin-Fruitland Coal Gas Pool.
3. Applicant has sought and has been unable to obtain voluntary agreement for pooling or farmout from David McLane, the owner of 25% of the working interest in the N/2 of said Section 15.
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

CASE 10706 : Application of Richardson Operating Company for compulsory pooling, San Juan County, New Mexico. Applicant in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Fruitland formation underlying the N/2 of Section 15, township 29 North, Range 12 West. Said unit to be dedicated to its Ropco Fee 15-2 FC Well located at a standard location 1845 feet from the North line and 1405 feet from the East line of said Section 15. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in completing said well in the Basin-Fruitland Coal Gas Pool. Said area is located approximately ____ miles ____ of _____, New Mexico.

