### KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

August 8, 1994

## HAND DELIVERED

Mr. William J. LeMay, Chairman Oil Conservation Commission 310 Old Santa Fe Trail Santa Fe, New Mexico 87501

71 8 1994

Re: REQUEST FOR HEARING DENOVO NMOCD CASE 11014

Order No. R-10158

Application of Phillips Petroleum Company for a Horizontal/High Angle Directional Drilling Pilot Project, Special Operating Rules therefor, a Non-Standard Oil Proration Unit, an Unorthodox Oil Well Location and a Special Project Oil Allowable and Production Testing Period, Eddy County, New Mexico

Dear Mr. LeMay:

On behalf of Phillips Petroleum Company, please find enclosed our request for a Hearing DeNovo of the referenced case before the New Mexico Oil Conservation Commission which we request be set for hearing on the September 22, 1994 docket.

Very truly yours

W. Thomas Kellahin

cc: David R. Catanach, OCD-Hearing Examiner
William F. Carr, Esq. Attorney for Bass Enterprises Production Co.
Elizabeth A. Harris, Esq. (Phillips-Odessa)

# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

> CASE NO. 11014 Order No. R-10158

Application of Phillips Petroleum Company for a Horizontal/High Angle Directional Drilling Pilot Project, Special Operating Rules therefor, a Non-Standard Oil Proration Unit, an Unorthodox Oil Well Location and a Special Project Oil Allowable and Production Testing Period, Eddy County, New Mexico

8 1994

# PHILLIPS PETROLEUM COMPANY'S REQUEST FOR A DE NOVO HEARING BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION

Comes now Phillips Petroleum Company, a party of record before the New Mexico Oil Conservation Division in Case 11014 and adversely affected by Division Order R-11014 entered July 7, 1994, by its attorneys Kellahin & Kellahin and pursuant to Section 70-2-13 NMSA-1978, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in this matter.

W. Thomas Kellahin Kellahin & Kellahin P. O. Box 2265

Santa Fe, New Mexico 87501

(505) 982-4285

# **CERTIFICATE OF MAILING**

I, W. Thomas Kellahin, hereby certify that on this 8th day of AUGUST, 1994, I caused to be provided a copy of the foregoing pleading by regular mail to all counsel of record in this matter.

W. Thomas Kellahin