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

LAWYERS

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

PATRICIA A. MATTHEWS
MICHAEL H. FELDEWERT
DAVID B. LAWRENZ
TANYA M. TRUJILLO

JACK M. CAMPBELL OF COUNSEL JEFFERSON PLACE

SUITE I - HO NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208

TELEPHONE: (505) 988-4421

TELECOPIER: (505) 983-6043

June 28, 1994

## **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 //023

Re:

Applications of AnSon Gas Corporation for Compulsory Pooling, Lea County,

New Mexico

Dear Mr. LeMay:

Enclosed in triplicate are four Applications of AnSon Gas Corporation in the above-referenced cases as well as copies of legal advertisements. AnSon Gas Corporation respectfully requests that these matters be placed on the docket for the July 21, 1994 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures

cc:

Mr. Charles E. Lundeen, Land Manager (w/enclosures)

AnSon Gas Corporation 3814 North Santa Fe

Oklahoma City, OK 73118

### BEFORE THE

#### OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

#### **APPLICATION**

ANSON GAS CORPORATION, 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 mineral interests in the SE/4 NW/4 of Section 33, Township 16 South, Range 38 East, N.M.P.M., Lea County, New Mexico, and in support thereof states:

- 1. Applicant owns or represents approximately 71% of the working interest in the SE/4 NW/4 of Section 33, and Applicant has the right to drill thereon.
- 2. Applicant proposes to dedicate the above-referenced spacing or proration unit to its Mary 33 Well No. 1 to be drilled at a standard oil well location in the SE/4 NW/4 of said Section 33, to a depth of approximately 11,800 feet, more or less, to test any and all formations from the surface to the base of the Strawn formation.
- 3. Applicant has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the SE/4 NW/4 of said Section 33.
- 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, all mineral interests should be pooled, and Applicant should

be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before an

Examiner of the Oil Conservation Division on July 21, 1994 and, after notice and hearing

as required by law, the Division enter its order pooling the lands, including provisions for

Applicant to recover its costs of drilling, equipping and completing the well, its costs of

supervision while drilling and after completion, including overhead charges, and imposing

a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the

well.

Respectfully submitted,

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

By:

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR ANSON GAS

CORPORATION

APPLICATION,

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NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

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Respectfully submitted,

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

By:

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Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR ANSON GAS

CORPORATION

APPLICATION,

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Application of AnSon Gas Corporation for compulsory pooling, Lea County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Strawn formation, underlying the SE/4 NW/4 of Section 33, Township 16 South, Range 38 East. Said unit is to be dedicated to the Mary 33 Well No. 1 to be drilled at a standard oil well location in the SE/4 NW/4 of said Section 33. 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 drilling said well. Said area is located approximately \_\_\_\_\_ miles \_\_\_\_\_ of \_\_\_\_\_, New Mexico.

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