

IN THE MATTER OF THE APPLICATION OF
BETTIS BROTHERS, INC. FOR ACREAGE REDEDICATION
AND UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO

BEFORE EXAMINER CATANACH
OIL CONSERVATION DIVISION
3ETTIS 200S EXHIBIT NO. 6
CASE NO. 9758

EXXON CORPORATION
P.O. BOX 1600
MIDLAND, TEXAS 79702

COQUINA OIL CORPORATION
1717 ST. JAMES PLACE
HOUSTON, TEXAS 77227

J.M. HUBER CORPORATION
200 WEST LOOP SOUTH
HOUSTON, TEXAS 77027

TERRA RESOURCES, INC.
5614 S. YALE, #400
TULSA, OKLAHOMA 74135

COLLINS & WARE
P.O. BOX 27
MIDLAND, TEXAS 79702

OXTEX, INC.
1717 ST. JAMES PLACE
HOUSTON, TEXAS 77227

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

OXTEX, INC.
1717 St. James Place
Suite 200
Houston, TX 77227-7725

4. Article Number

P 106 676 151

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Address

X

6. Signature — Agent

X

7. Date of Delivery **SEP 1 1989**

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988

★ U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

P-106 676 151

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to OXTEX INC	
Street and No. 1717 St. James Place	
P.O., State and ZIP Code Houston, TX 77227	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date August 28, 1989	

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the **RETURN TO** space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
J.M. HUBER Corp.
2000 W. Loop South
Houston, Texas 77027
ATTN: Mr. H.L. Curtis

4. Article Number
P 106 676 147

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X *M. Schley*

6. Signature - Agent
X

7. Date of Delivery
9-1-89

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Feb. 1986 **DOMESTIC RETURN RECEIPT**

P-106 676 147

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985

Sent to J.M. HUBER CORP.	
Street and No. 200 W. Loop South	
P.O., State and ZIP Code Houston, TX 77027	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date August 28, 1989	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: COLLINS & WARE P.O. Box 27 Midland, TX 79702	4. Article Number P 106 676 149 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>[Signature]</i>	
7. Date of Delivery SEP - 5 1989	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P-106 676 149

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	
Collins & Ware	
Street and No	
P.O. Box 27	
P.O., State and ZIP Code	
Midland, TX 79702	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
August 28, 1989	

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge)
2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
COQUINA OIL CORPORATION
1717 St. James Place
Suite 200
Houston, TX 77227-7725
ATTN: Mr. Michael Englert

4. Article Number
P 106 676 150

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address
X

6. Signature - Agent
X *[Signature]*

7. Date of Delivery
SEP 1 1989

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P-106 676 150

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Coquina Oil Corp.	
Street and No. 1717 St. James Place	
P.O. State and ZIP Code Houston, TX 77227	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date August 28, 1989	

PS Form 3800, June 1985

P-106 676 148

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to EXXON CORPORATION	
Street and No P.O. Box 1600	
P.O. State and ZIP Code Midland, TX 79702	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date August 28, 1989	

PS Form 3800, June 1985

P-106 676 146

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to TERRA RESOURCES, INC.	
Street and No 5614 S. Yale, #400	
P.O. State and ZIP Code Tulsa, OK 74135	
Postage	\$.25
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date August 28, 1989	

PS Form 3800, June 1985

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

IN THE MATTER OF THE APPLICATION OF
BETTIS BROTHERS, INC. FOR ACREAGE REDEDICATION
AND UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE NO. _____

APPLICATION

BETTIS BROTHERS, INC., applies to the Oil Conservation Division for approval of the rededication of acreage and an unorthodox gas well location. In support, Applicant states:

1. Applicant operates the State 16-1 Well at a standard location 1980 feet from the East line and 660 feet from the South line of Section 16, Township 23 South, Range 26 East, NMPM, Eddy County New Mexico. The well produces from the Morrow formation in the Carlsbad Strawn South Pool. The S/2 of Section 16 is presently dedicated to the Well.

2. Applicant proposes to rededicate the E/2 of Section 16 to the 16-1 well, forming a standard 320 acre spacing and proration unit but resulting in an unorthodox location for the existing well.

3. Accordingly, Applicant seeks an exception to the well locational requirements of Oil Conservation Division Rule 104 for the 16-1 Well.

4. The mineral interest ownership throughout the entirety of Section 16 is consistent and will be unaffected. All offset owners

have provided written waivers to Applicant's proposal.

5. Approval of this application will afford applicant the opportunity to produce its just and equitable share of the hydrocarbons underlying the area and will otherwise be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant prays that this matter be set for hearing before a duly appointed Examiner of the Oil Conservation Division on September 20, 1989, and that after notice and hearing as required by law, the Division enter its Order granting this application and providing such other relief as is proper.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By



J. SCOTT HALL
P.O. Box 2208
Santa Fe, New Mexico
87504-2208
(505) 988-4421

ATTORNEYS FOR BETTIS BROTHERS, INC.

CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
J. SCOTT HALL
JOHN H. BEMIS
WILLIAM R. SLATTERY
PATRICIA A. MATTHEWS

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

August 28, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO ALL INTEREST OWNERS:

Re: In the Matter of the Application of Bettis Brothers, Inc.
For Acreage Rededication and Unorthodox Gas Well
Location, Eddy County, New Mexico

Gentlemen:

This letter is to advise you that Bettis Brothers, Inc. has filed the enclosed application with the New Mexico Oil Conservation Division.

This application has been set for hearing before a Division Examiner on September 20, 1989. You are not entitled to attend this hearing, but as an offsetting interest owner, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging this application at a later date.

Very truly yours,



J. Scott Hall
Attorney for Bettis Brothers, Inc.

JSH:mtb
Enclosure

RECEIVED

AUG 28 1980

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT CONSERVATION DIVISION

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF
BETTIS BROTHERS, INC. FOR ACREAGE REDEDICATION
AND UNORTHODOX GAS WELL LOCATION,
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