

KELLAHIN, KELLAHIN and AUBREY
Attorneys at Law

W. Thomas Kellahin
Karen Aubrey

El Patio - 117 North Guadalupe
Post Office Box 2265

Telephone 982-4285
Area Code 505

Jason Kellahin
Of Counsel

Santa Fe, New Mexico 87504-2265

Fax: 505/982-2047

September 25, 1989

Mr. William LeMay
Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504

Re: Application of Oryx Energy Company
for Compulsory Pooling
Well Name: Ojo Chiso Federal Well #2.
Lea County, New Mexico

RECEIVED

SEP 25 1989

OIL CONSERVATION DIVISION

Case 9783

Dear Mr. LeMay:

On behalf of Oryx Energy Company please find enclosed our Application for Compulsory Pooling which we would request be set for hearing on the next available Examiner's docket now scheduled for October 18, 1989.

By copy of this letter to all parties to be pooled, we are notifying them by certified mail, return-receipt requested, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support of or in opposition to the application. In addition, they are advised that the entry of a Compulsory Pooling Order will affect their rights to share in the production from the subject well.

Very truly yours,



W. Thomas Kellahin

WTK/lw
Encl.

cc: Mr. Charles Gray

Certified Mail Return-Receipt
all parties listed on Exhibit "A" and "B"
of the Application, w/encl.

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

RECEIVED

SEP 25 1989

OIL CONSERVATION DIVISION

CASE NO. 9783

IN THE MATTER OF THE APPLICATION OF
ORYX ENERGY COMPANY
FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO

A P P L I C A T I O N

COMES NOW, ORYX ENERGY COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey and in accordance with Section 70-2-17(c) NMSA (1978) applies to the New Mexico Oil Conservation Division for an order pooling all mineral interest as follows:

[REDACTED] acres spacing and proration unit for any gas production from the top of the Wolfcamp to 100' below base of the Morrow Formation, **[REDACTED]** said section to form a standard 160 acre spacing and proration for gas production above the top of the Wolfcamp formation and **[REDACTED]** of said section to form a standard 40 acre spacing and proration unit for any oil production.

The above described unit is to be dedicated to a well to be drilled to 100' below base of the Morrow Formation in the Antelope Ridge Morrow Gas Pool at a standard gas well location.

1. Applicant is working interest owner in the S/2 of Section **[REDACTED]**

2. Applicant desires to drill a well at a standard location 200 [REDACTED] 26
3. Applicant has sought a voluntary agreement with all those parties shown on Exhibit "A" for the formation of appropriate spacing and proration unit as shown on for the drilling of the subject well, but has been unable to obtain a voluntary agreement
4. The offset operators towards whom the subject well will encroach are set forth on Exhibit "B" attached hereto.
5. Pursuant to the Division notice requirements, applicant has notified all those parties shown on Exhibit "A" of this application for compulsory pooling and the Applicant's request for a hearing before the Division to be set on October 18, 1989.
6. In order to obtain its just and equitable share of the potential production underlying the above tract, Applicant needs an order pooling the mineral interest involved in order to protect Applicant's correlative rights and prevent waste.


WHEREFORE, Applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order approving the unorthodox location and pooling the mineral interest described herein. Applicant further prays that it be named operator of the well, and that the order make provisions for Applicant to recover out of production its costs of

2. Applicant desires to drill a well at a standard location 2000 [REDACTED] 26
3. Applicant has sought a voluntary agreement with all those parties shown on Exhibit "A" for the formation of appropriate spacing and proration unit as shown on for the drilling of the subject well, but has been unable to obtain a voluntary agreement
4. The offset operators towards whom the subject well will encroach are set forth on Exhibit "B" attached hereto.
5. Pursuant to the Division notice requirements, applicant has notified all those parties shown on Exhibit "A" of this application for compulsory pooling and the Applicant's request for a hearing before the Division to be set on October 18, 1989.
6. In order to obtain its just and equitable share of the potential production underlying the above tract, Applicant needs an order pooling the mineral interest involved in order to protect Applicant's correlative rights and prevent waste.

WHEREFORE, Applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order approving the unorthodox location and pooling the mineral interest described herein. Applicant further prays that it be named operator of the well, and that the order make provisions for Applicant to recover out of production its costs of

drilling, completing and equipping the subject well, costs of operation, including costs of supervision, and a risk factor in the amount of 200% for the drilling and completing of the well, for such other and further relief as may be proper.

Respectfully submitted,

By: 
W. Thomas Kellahin

Kellahin, Kellahin & Aubrey
Post Office Box 2265
Santa Fe, New Mexico 87504

(505) 982-4285

E X H I B I T " A "

BTA Oil Producers 104 South Pecos Midland, TX 79701	25%
Pacific Enterprises 10 Desta Drive, Suite 500 W. Midland, TX 79705	12.5%
Joe Reynolds 2333 50th Street Lubbock, TX 79421	12.5%