KELLAHIN, KELLAHIN and AUBREY

Attorneys at Law

W. Thomas Kellahin Karen Aubrev

Iason Kellahin Of Counsel

El Patio - 117 North Guadalupe Post Office Box 2265

Santa Fé, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

FAX: 505/982-2047

October 10, 1989

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HAND-DELIVERED

Mr. William J. LeMay Oil Conservation Division P.O. Box 2088

Santa Fe. New Mexico 87501

OIL CONSERVATION DIVISION

9807

Anadarko Petroleum Corporation Re: for Compulsory Pooling. Unorthodox Surface and Subsurface Location and Approval to Intentionally Deviate Well Bore. Lea County.

New Mexico

Dear Mr. LeMay:

On behalf of Anadarko Petroleum Corporation, please set the enclosed application for hearing at the next available examiner's docket now set for November 1, 1989.

By copy of this letter and application sent certified mail return-receipt to all working interest owners and offset operators, we are notifying each of them of the right to appear at the hearing either in support or in opposition to this application. Should any such party desire more information about this matter or about the procedures to hearing this application. they may call the Division or the undersigned.

WTK/tla

cc: Mr. Wayne Wheelis Anadarko Petroleum Corporation P.O. Box 2497 Midland, Texas 79701

"Certified-Return Receipt Requested"

All parties listed on Exhibit "A"

ETATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF ANADARKO PETROLEUM CORPORATION FOR APPROVAL FOR COMPULSORY POOLING, DIRECTIONAL DRILLING AND APPROVAL OF AN UNORTHODOX SURFACE AND SUBSURFACE LOCATION, UNDESIGNATED STRAWN POOLLEA COUNTY, NEW MEXICO.

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APPLICATION

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Comes now ANADARKO PETROLEUM CORPORATION by and through its attorneys. Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for an order pooling all mineral interests from the surface to the base of the Undesignated Strawn formation, or 11,700 feet whichever is deeper, underlying the SE/4 NW/4 of Section 33. T16S, P38E, Lea County, New Mexico, and approval for directional drilling and an unorthodox surface and subsurface location in the Undesignated Strawn Pool.

- 1. Anadarko Petroleum Corporation is the working interest owner and operator and has the right to drill and develop the SE/2 NW/4 of Section 33, T16S, R38E, N.M.P.M., Lea County, New Mexico.
- 2. Applicant proposes to drill its J. Smith No. 1 Well commencing at an unorthodox surface location, because of topography, 2230 feet from the West line and 2440 feet from the North line and then to drill vertically to a true

vertical depth of approximately 4900 feet at which point the well will be directionally drilled in a northeasterly direction to the Strawn formation at a true vertical depth of approximately 11,700 feet and within a 125 foot radius of an unorthodox bottom hole location of 2550 feet from the West line and 2060 feet from the North line, all in Section 33, T16S, F38E. N.M.P.M., Lea County, New Mexico. The approximate total depth of the well will be about 11,700 feet.

- 3. Applicant has sought the voluntary agreement of the owners of the nonconsenting working interests for the formation of an 40-acre spacing and proration unit but has been unable to obtain voluntary agreement. The monconsenting working interest owners and their percentage interests are:
 - 1. Amerada Hess 1201 Louisiana. Suite 700 Houston, Texas 77002-5681
 - 2. Fernand Fenencourt .0017
 - 3. Paul Balband .00125
- 4. In accordance with Division Rule 111, applicant seeks approval to directionally drill the subject well based upon geologic and economic reasons.
- 5. All offset operators and working interest owners have been provided with a copy of this application pursuant to Division Notice Rules.

- 6. Applicant requests that this application be set for hearing on November 1, 1989.
- 7. In order to obtain its just and equitable share of the hydrocarbons underlying the above tract, applicant needs an order pooling the mineral interests involved in order to protect applicant's correlative rights and prevent waste.
- 8. Wherefore, applicant prays that this application be set for hearing, that the Division enter its order pooling the mineral interests described herein, that applicant be named operator of the well, and that the order make provision for applicant to recover, out of production, its cost of drilling, completing and equipping the subject well, cost of operation, including costs of supervision, and a risk factor in the amount of 200%, for the drilling and completion of the well, that the intentional deviation of the wellbore be approved, and that the unorthodox surface and bottomhole locations be approved without penalty.

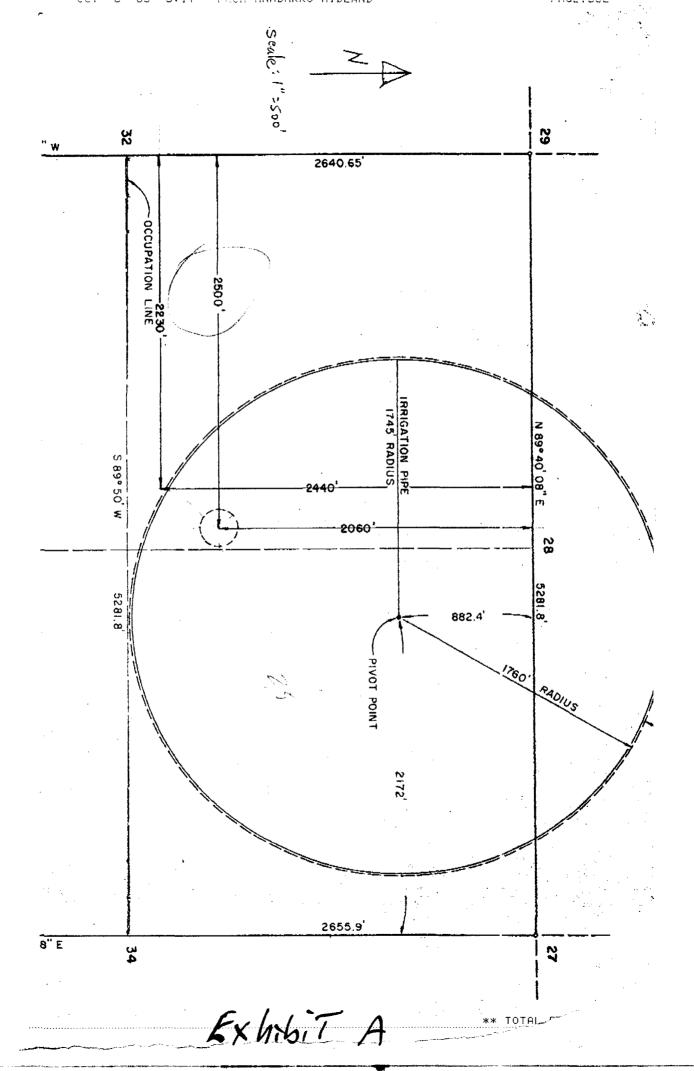
Respectfully submitted

Karen Aubrey

Kellahin, Kellahin & Aubrey

P.O. Box 2265

Santa Fe, NM 87504



KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

117 NORTH GUADALUPE POST OFFICE BOX 2265

SANTA FE. NEW MEXICO 87504-2265

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

JASON KELLAHIN Of Counsel

KAREN AUBREY

W. THOMAS KELLAHIN

CANDACE HAMANN CALLAHAN

April 17, 1990

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Examiner Michael Stogner
Oil Conservation Division
State Land Office
OIL CONSERVATION DIVISION

HAND DELIVERED

Re: Case No. 9807 Order No. R-9046

Santa Fe. New Mexico 87501

Application of Anadarko Petroleum Corporation for Compulsory Pooling, Unorthodox Surface and Bottomhole Locations, and Directional Drilling

Request for Administrative Approval of Amendment to Order No. R-9046

Dear Mr. Stogner:

In accordance with our telephone conversation of April 17, 1990, this letter constitutes a formal request on behalf of Anadarko Petroleum Corporation for administrative approval of a change in the unorthodox surface location granted after notice and hearing, under the above captioned case and order numbers.

The original unorthodox surface location was necessitated by the existence of a circular irrigation system. When Anadarko staked the location it was discovered that the requested location is only 36.6 feet from the end of the rattail of the circular sprinkler. We suspect that the surface owner may have added another length of pipe to the system.

We request that the Division approve an unorthodox surface location of up to 100 feet to the southwest of the present unorthodox location. The bottomhole location will remain the same.

The exhibits submitted by Anadarko at the hearing will support this request.

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9807

Michael Stogner April 17, 1990 Page 2

Thank you for your assistance in this matter.

Sincerely,

Karen Aubrey

KA/tic

xc: George Buehler, Anadarko Petroleum Corporation Jerry Sexton, Oil Conservation Division, Hobbs, New Mexico

KELLAHIN, KELLAHIN and AUBREY Attorneys at Law

W. Thomas Kellahin Karen Aubrev

Iason Kellahin Of Counsel

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CIL CONSERVATION DIVISION

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October 10, 1989

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Mr. William J. LeMay Oil Conservation Division P.O. Box 2088 Santa Fe. New Mexico 87501

Re: Anadarko Petroleum Corporation for Compulsory Pooling. Unorthodox Surface and Subsurface Location and Approval to Intentionally Deviate Well Bore, Lea County, New Mexico

Dear Mr LeMav:

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Very/truly yours,

WTK/tic

cc: Mr Wayne Wheelis Anadarko Petroleum Corporation P O. Box 2497

Midland, Texas 79701

"Certified-Return Receipt Requested"

All parties listed on Exhibit "A"

EXHIBIT "A"

- 1. Paul Balband ... Paris. France
- Fernand Renoncourt c/o The Imperial Trusts Company of Canada Toronto 2, Ontario, Canada
- Wood Oil Company 320 South Boston, Suite 518 Tulsa, Oklahema 74103
- 4. TXO Production Company 415 West Wall, Suite 900 Midland Texas 79701-4468
- Amerada Hess Corporation 1201 Louisiana. Suite 700 Houston, Texas 77002-5681
- 6. Pacific Enterprises Revalty Company 10 Desta Drive. Suite 500 West Midland. Texas 79705
- 7. BP Exploration Inc. 5151 San Felipe P.O. Box 4587 Houston, Texas 77210
- Roy G. Barton, Jr., Trustee 16. F. Farr Halliday, et ux of the Roy G. Barton Sr. and Opal Barton Revocable Trust P.O. Box 978 Hobbs, New Mexico 88240
- Betty Pue Box 1027 Childress, Texas 79201

- 10. Thomas L. Bailiff, as Ind. Exec. u/w/o. T. C. Bailiff and Edith Bailiff, dec'd Box 1027 Childress, Texas 79201
 - 11. Douglas I. Cone Box 6217 Lubbock, Texas 79413
 - 12. Clifford Cone Box 6010 Lubbock, Texas 79413
 - 13. Kenneth G. Cone Box 1131(Midland, Texas 79702
 - 14. Randall F. Montgomery, et ux Mildred Marie. as Joint Tenants. W/R/S 82 April Wind South Montgomery, TX 77356
 - 15. E. L. Latham Co. P.O. Box 1392 Hobbs, New Mexico 88240
 - Marcella, as Joint Tenants W/R/S 400 River Oaks Dr. Des Moines, Iowa
- 9. Thomas L. Bailiff, et ux 17. Eloise F. Hirschfeld Black 2606 Dengar Midland, Texas 79705
 - 18. Edward W. Reif. et ux C. Jean c/o Black, Sivalls & Bryson Box 1714 Oklahoma City, OK