# 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 P. SLATTERY PATRICIA A. MATTHEWS JEFFERSON PLACE SUITE I - 110 NORTH GUADALUPE POST OFFICE BOX 2208 SANTA FE, NEW MEXICO 87504-2208 TELEPHONE: (505) 988-4421 TELECOPIER: (505) 983-6043

5

\$

Case 9819

November 3, 1989

## HAND-DELIVERED

CEIVED

NOV - 3 1989

OIL CONSERVATION DIVISION

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

> Re: In the Matter of the Application of Blackwood & Nichols Co., Ltd., for Compulsory Pooling and an Unorthodox Gas Well Location, San Juan and Rio Arriba Counties, New Mexico

.

Dear Mr. LeMay:

Enclosed in triplicate is the above-referenced Application of Blackwood & Nichols Co., Ltd. Blackwood & Nichols respectfully requests that this matter be placed on the docket for the Examiner hearings scheduled on November 15, 1989.

Very truly yours,

WILLIAM F. CARR

WFC:mtb Enclosures cc w/enclosures:

Mr. Steve Cromwell Devon Energy Corporation 1500 Mid-America Tower Oklahoma City, Oklahoma 73012

#### BEFORE THE

## OIL CONSERVATION DIVISION

## NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF NOV BLACKWOOD & NICHOLS CO. LTD., FOR COMPULSORY POOLING AND AN UNORTHODOX OF COMPAREMENTS OF SHORE GAS WELL LOCATION, SAN JUAN AND RIO ARRIBA COUNTIES, NEW MEXICO. CASE NO. <u>48/9</u>

## **APPLICATION**

BLACKWOOD & NICHOLS CO. LTD., hereby makes application to the Oil Conservation Division pursuant to Section 70-2-17, N.M.S.A. (1978) for an order pooling all of the mineral interests from the surface to the base of the Fruitland formation, Basin-Fruitland Coal Gas Pool, for any and all formations and/or pools developed on 320-acre spacing under the W/2 of Section 4, Township 30 North, Range 7 West, N.M.P.M., San Juan and Rio Arriba Counties, New Mexico, and approving an unorthodox coal gas well location, and in support thereof states:

1. Applicant owns approximately 75% of the working interest in and under the proposed pooled unit comprised of the W/2 of Section 4, and Applicant has the right to drill thereon.

2. Applicant also seeks an exception to the provisions of Rule 7 of the Special Rules and Regulations for the Basin-Fruitland Coal Gas Pool to permit it to drill its Northeast Blanco Unit Well No. 424 in the NW/4 of Section 4 at a location 2075 feet from the North line and 1330 feet from the West line.

3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the W/2 of said Section 4 except for the following owners of working interest:

Robert C. Witten 535 East 86th Street New York, New York 10028

Robert C. Witten and Frederick S. Nathan Co-Personal Representatives of the Estate of Barbara Y. Witten, Deceased 535 East 86th Street New York, New York 10028

Morris Mizel and Floral Mizel 6560 East 41st Street Tulsa, Oklahoma 74145

Sam Mizel and Deanna Mizel Post Office Box 6754 Abilene, Texas 79608

Myran Gimp Raffkind and Daniel Raffkind 3800 Danbury Street Amarillo, Texas 79109

Judy Gimp Zweiback 9008 Pacific Omaha, Nebraska 68114

4. Said pooling of interests and approval of an unorthodox gas well location 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, the 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 a duly appointed Examiner of the Oil Conservation Division on November 15, 1989, and that after notice and hearing as required by law, the Division enter its order approving an unorthodox location for the Northeast Blanco Unit Well No. 424 and 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, and making such other and further provisions as may be proper.

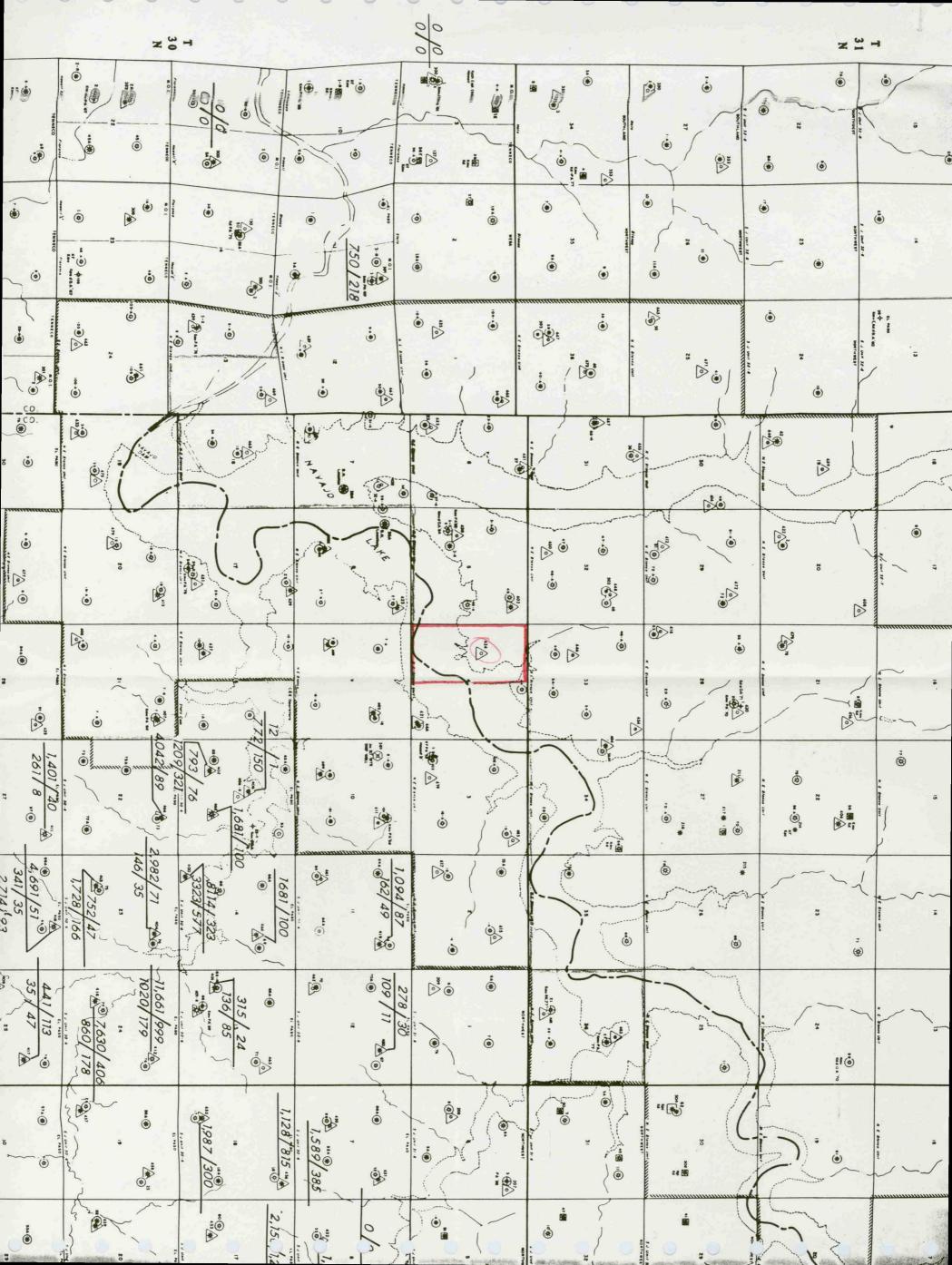
Respectfully submitted,

CAMPBELL & BLACK, P.A.

By:

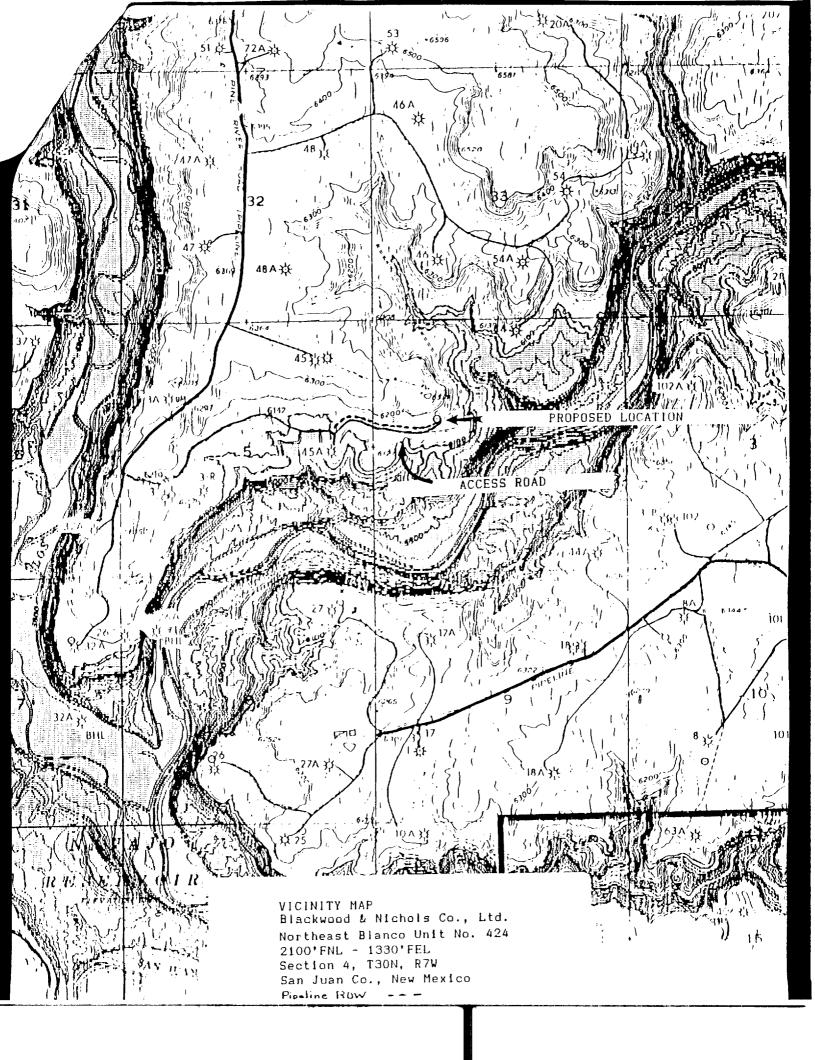
WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR BLACKWOOD & NICHOLS CO. LTD.



	Form 9-331 C (May 1953)	DEPARTMENT GEOLOG	ICAL SURVEY		ctians on Ide) <u>30</u> .	Budget Bureau No. 42-R1423	
	1a. TIPE OF WORK D. TIPE OF WELL WELL WELL 2. NAME OF OPERATOR 3. ADDRESS OF OPERATOR 4. LOCATION OF WELL At surface At proposed prod. z	P.O. Box 123 Report location clearly and I 2100' FNL - one same	CK   7. 00 Nor 6. 00 -1237 10. 0 Bas 11. 0 Sec	IELD AND POOL, OR WILDCAT in Fruitland Coal RC. T. R. M. OR BLR. ND AURVET OR AREA .4, T'30N, R7W, NMI'M			
	15. DISTANCE FROM PRO LOCATION TO NEARE PROFERTY OR LEASE	rusen* 197 1 LINE, FT. 5 rlg. unit lise, if any)	of Blanco, Ne 40'		1	, 38	
This a proced	TO NEAREST WELL, or Applied For, on t	DIGLING, COMPLETED, 2 HIS LEASE, FT. 2 hether DF. RT. GR. etc.) 6140 GL	450'	3016'	Rota		
and at	$   \frac{12 1/4"}{6 1/4"} $	ЭГН 1185.4.       Ри         8120 OF CABINO       9 5/8"         9 5/8"       7"         7"       5 1/2"	OPOSED CASING A         36#         23 # #         17 #	ND CEMENTING PROGRA 8ETTING DEPTII 300' 2790' 2690'-3016'	<u>SUBJECT TO (</u> <u>"GENERAL R</u> 207 cuft 78 <u>1 cuft</u>	to circulate to circulate	
	300 <sup>1</sup> . Run and to 600 psi. Dr gases or abnorr returns to surf	surface, sh water mu run and ce n rig. Tes un a produ	Ace hole to a TD of WOC 12 hours. Test ad. No poisonous emented with cement to 1500 psi. Action liner. The RECEIVE				
		sts a gas pipelin aip is Bureau of H		wn on the attack	hed Vicinit	OIL CON. DIV	
	IN ABOVE SPACE DESCRI	n rhorogen rhoggam : If pr o drill or deepen directionall	o angrob of all famous	ping back, give data on pi of subsurface locations ar OIL CHAIS: WARK	id measured and t	DIST. 3 some and proposed new productive sue vertical depths. Give blowout	
	BIGNEDWell	leans FUL	TITLE_	Operations Manad		Jan 23, 1989	
	PERMIT NO Approved by Conditions of Appro		TITLE	APPROVAL DATE	AS	NPPROVED <b>*AtMENDED</b> AR 1-7 1989	
,۱ <sup>۱</sup>		· all	*See Instruction	s On Reverse Side	ARE	A MANAGER	
	, and the second s	an a					

	N MEXICO	SANTA F	PO. BOX 2088 FE, NEW MEXICO 8	7501	Fore C-10 Revised
/ .			from the outer boundaries of	•	
rator			Lease		Well No.
Blackwood &		Co., L'ID.	Northeast H	Blanco Unit	424
F Sect	4	30 North	7 West	San Juan	1
ial Foolage Location		4 b	1220	1el +	
2100 fee	t from the Ni Producing Form	orth time and	1330 100	it from the West	line Dedicated Acreages
6140 Fruitlan			Basin Fruitland Coal		319.38
. Outline the sc	reage dedicat	ed to the subject we	ell by colored pencil o	r hachure marks on t	the plat below,
interest and ro . If more than on	yalty). e lease of di		l, outline each and ide dedicoted to the well, ng. etc?		
Yes X	No lían	swer is "yes;" type o	consolidation		
		wners and tract desci t 67 is uncommite	riptions which have ac	tually been consolid	lated. (Use reverse s
	-		interests have been c	onsolidated (by con	nmunitization, unitiz
	•		unit, eliminating such	•	
				·	
، ربعة هان جيرة على المتر علي			1 My fing		CERTIFICATION
، بيني وين علي المر ميرو			No Other	And teined he	CERTIFICATION certify that the Information arean is true and complete by knowledge and belief
	Zico'		No (Pater) Weller Just	And teined he	certify that the Information trein is true and complete
SF	079043		Weller for	Position	certify that the Information trein is true and complete
·Tr	079043 ct 10		No (Pyher) Well find	teined he best of m <u>Will</u> Norne Position Operate	certify that the Information are in is true and complete by knowledge and belief <i>Lacop</i> FUG
· Tr	11		No Opher Weller Just	teined he best of m <u>Will</u> Norne Position Operate	certify that the Information are in is true and complete by knowledge and belief (certify FCC)
· Tr	act 10		No (Pater) weller find	reined he best of m <i>Will</i> Name Position Operate <u>Company</u> Blackwo Dgig	certify that the Information are in is true and complete by knowledge and belief leave flog ions Manager bod & Nichols
· Tr	act 10		No (Pyher) Wellinging	reined he best of m <i>Will</i> Name Position Operate <u>Company</u> Blackwo Dgig	certify that the Information are in is true and complete by knowledge and belief ions Manager bod & Nichols 23, 1989
· Tr	act 10		Port INE F	reined he best of m Name Position Operation Blackwo Dain Merrie	certify that the Information are in is true and complete by knowledge and belief <i>leaser</i> FUG ions Manager bod & Nichols 23, 1989 E. C. ED/V
· Tr	act 10	4-	ecenver Ecenver	reined he best of m Name Position Operation Deration Blackwo Dain Merry I herek	certify that the Informatic arean is true and complete by knowledge and belief <i>leased</i> FCC ions Manager bod & Nichols <b>23</b> 1989 E C. EDIL Securit Hering Parties
· Tr	Ct 10	4-	ECENVE MAR 24 1989	reined he best of m Mane Position Operation Operation Blackwo Day Mane I herkky shorn on noise of	certify that the Informatic arean is true and complete ty knowledge and belief <i>leaser</i> FCIA ions Manager bod & Michols 23, 1989 E C. ED/14 Servit #5/100 Partie
· Tr	act 10		MAR21 1989	reined he best of m Name Position Operation Operation Blackwo Dain Pertector I hereku shown on note of unde y	certify that the Information are in is true and complete ty knowledge and belief lease Fichols ions Manager bod & Nichols 23, 1989 E C. EDIN this diat was plain With recuf 23-52 is made by your usion, and inc. in the correct to the boli
Fee	Fee	=66 O	MAR212 1989 IL CONL DIM	reined he best of m Name Position Operation Operation Blackwo Dain Pertector I hereku shown on note of unde y	certify that the Informatic arean is true and complete ty knowledge and belief leaser Ford ions Manager bod & Nichols 23, 1989 E C. EDIN C.
Fee	Fee	=66 O	MAR21 1989	reined he best of m Name Position Operation Operation Blackwo Dain Pertector I hereku shown on note of unde y	certify that the Information are in is true and complete ty knowledge and belief <i>leased</i> Field ions Manager bod & Nichols 23, 1989 E C. ED/11- C.
Fee	Fee	=66 O	MAR21 1989 IL COM. DIV IL LOMA DIV IL LOMATINIARI	reined he best of m Name Position Operation Operation Blackwo Dais Dais Detter i hereku shown on note of unde y is more knowlook	certify that the Information rein is true and complete in knowledge and belief leaver FUG ions Manager bod & Nichols 23, 1989 E C. EDIN C.
Fee	Fee	66 0 	MAR212 1989 IL COIN, DIM MAR212 1989 IL COIN, DIM MAR214 1989 IL COIN, DIM MAR214 1989 IL COIN, DIM MAR215 1989 IL COIN, DIM MAR216 1989 IL COIN,	reined he best of m Name Position Operation Operation Company Blackwo Dain Machine I herkky shown of note of is minist knowlood Knowlood	certify that the Information are in is true and complete try knowledge and beliet learn Filler ions Manager bod & Michols 23, 1989 E C. EDIN C. EDIN
Fee	Fee	66 0 	MAR211 1989 IL COM. DIM IL COM. DIM IN DIM IS AND AND AND IS NU VZINICES IS NU VZINICES	reined he best of m Name Position Operation Operation Blackwo Dain Market I herkky shown of note of is ministration Knowlood Knowlood	certify that the Information are in is true and complete try knowledge and beliet learn Folds ions Manager bod & Michols 23 1989 E C. EDIN C. EDIN
Fee	Fee	66 0 	MAR212 1989 IL COIN, DIM MAR212 1989 IL COIN, DIM MAR214 1989 IL COIN, DIM MAR214 1989 IL COIN, DIM MAR215 1989 IL COIN, DIM MAR216 1989 IL COIN,	reined he best of m Name Position Operation Operation Dais Name I herekk shown on noise of under m Is much know lead Cave Survey 1 Registered and or Land	certify that the Informatic arein is true and complete ty knowledge and belief lease Field ions Manager bod & Nichols 23, 1989 E. C. ED/1, Servit Halling Partie this diat was plained from his diat was plained from this diat was plained from the struct to the test and the structure 2/2/88 Protessional Engineer





C.	16	1
(61/)	<u>*) )</u>	<u>×</u>
$\emptyset$	000	Ò
	13.	
$\mathfrak{O}_{t}$	01	<b>5</b> .N
	<u></u>	~
<u>الم</u>	ക	<b>.</b> .
6	(J	`x¢