CAMPBELL & BLACK, P.A.

LAWYERS

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Case 9819

November 3, 1989

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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

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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.

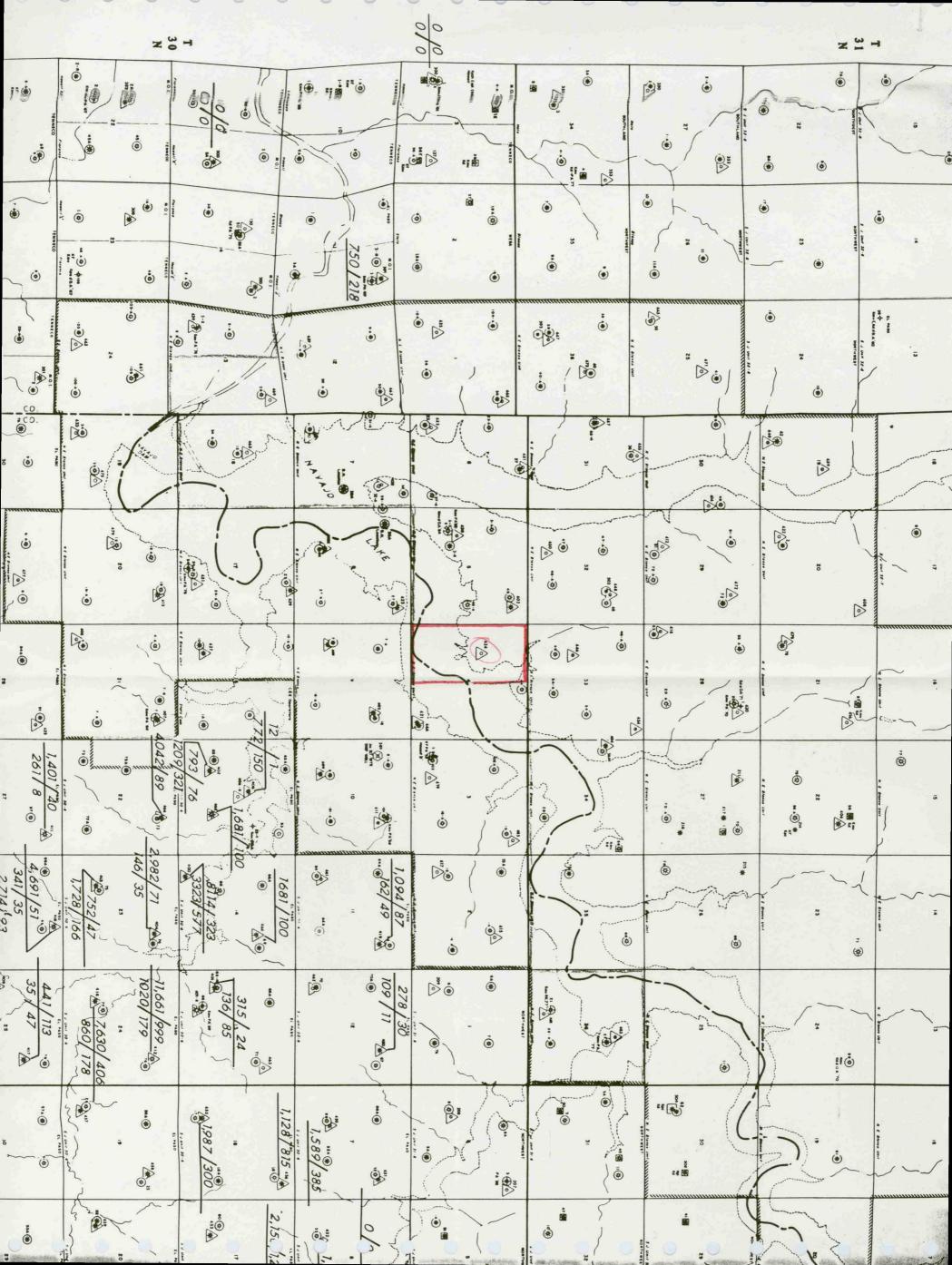
Respectfully submitted,

CAMPBELL & BLACK, P.A.

By:

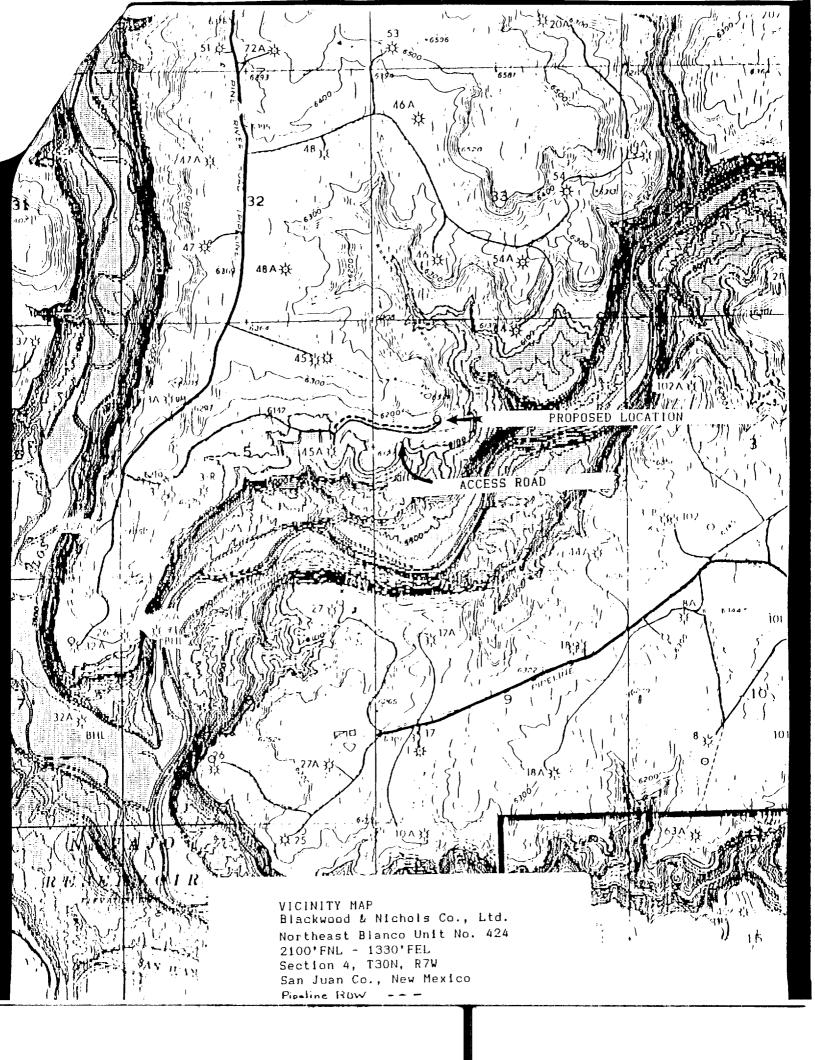
WILLIAM F. CARR Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR BLACKWOOD & NICHOLS CO. LTD.



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