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April 10, 1990

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APR 10 1990

OIL CONSERVATION DIVISION

9934

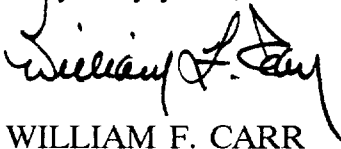
William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

Re: In the Matter of the Application of Amerind Oil Company Limited
Partnership for an Unorthodox Well Location, Lea County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is an application of Amerind Oil Company Limited Partnership in the above-referenced case. Amerind Oil Company Limited Partnership respectfully requests that this matter be placed on the docket for the May 2, 1990 Examiner hearings.

Very truly yours,


WILLIAM F. CARR

WFC:mlh

Enclosures

cc w/enclosure:

Mr. Robert C. Liebrock
Amerind Oil Company Limited Partnership
415 W. Wall Street, Suite 500
Wilco Building
Midland, Texas 79701

BEFORE THE
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION
OF AMERIND OIL COMPANY LIMITED
PARTNERSHIP FOR COMPULSORY
POOLING AND AN UNORTHODOX
WELL LOCATION,
LEA COUNTY, NEW MEXICO.

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OIL CONSERVATION DIVISION

CASE NO. 9934

APPLICATION

COMES NOW AMERIND OIL COMPANY LIMITED PARTNERSHIP, through its undersigned attorneys, hereby makes application to the Oil Conservation Division pursuant to N.M.Stat.Ann. § 70-2-17 for an order pooling all mineral interests in the Strawn formation underlying the E/2 SW/4 of Section 35, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico and for approval of an unorthodox well location, and in support thereof would show the Division:

1. Applicant owns or represents approximately 87.53% of the working interest underlying the E/2 SW/4 of Section 35, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and has the right to drill thereon.
2. Applicant proposes to drill a well to test the Strawn formation, Shipp Strawn Pool, at a point 1300 feet from the South line and 1750 feet from the West line of Section 35.

3. Applicant seeks an exception to Rule 4 of the Special Pool Rules for the Shipp Strawn Pool to permit the drilling of the well at the above-described unorthodox location to a depth sufficient to adequately test the Strawn formation.

4. A standard 80-acre proration unit comprising the E/2 SW/4 of Section 35 will be dedicated to the well.

5. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the E/2 SW/4 of Section 35 except for the following:

Conoco Inc.
726 E. Michigan
Hobbs, New Mexico 88240
Attn: Mr. Mike Boney

Tom Brown, Inc.
508 W. Wall Street, Suite 500
Midland, Texas 79701
Attn: Mr. Tom Brown

H.L. Brown, Jr. and
Elizabeth M. Brown
c/o H.L. Brown, Jr.
Post Office Box 2237
Midland, Texas 79702
Attn: Mr. Peter Courtney

ORYX Energy Company
Post Office Box 2880
Dallas, Texas 75221-2880
Attn: Mr. Keith Nelson

Pat Alston Ward
Post Office Box 38
Lincoln, New Mexico 88338


6. Said pooling of interests and approval of an unorthodox well location will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

7. 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 May 2, 1990, and that after notice and hearing as required by law, the Division enter its order 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 AMERIND OIL
COMPANY LIMITED PARTNERSHIP

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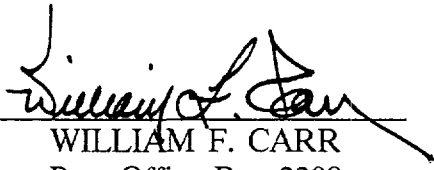
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Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR AMERIND OIL
COMPANY LIMITED PARTNERSHIP

County Lea Pool Shipp-Strawn

TOWNSHIP 16 South Range 37 East NMPM

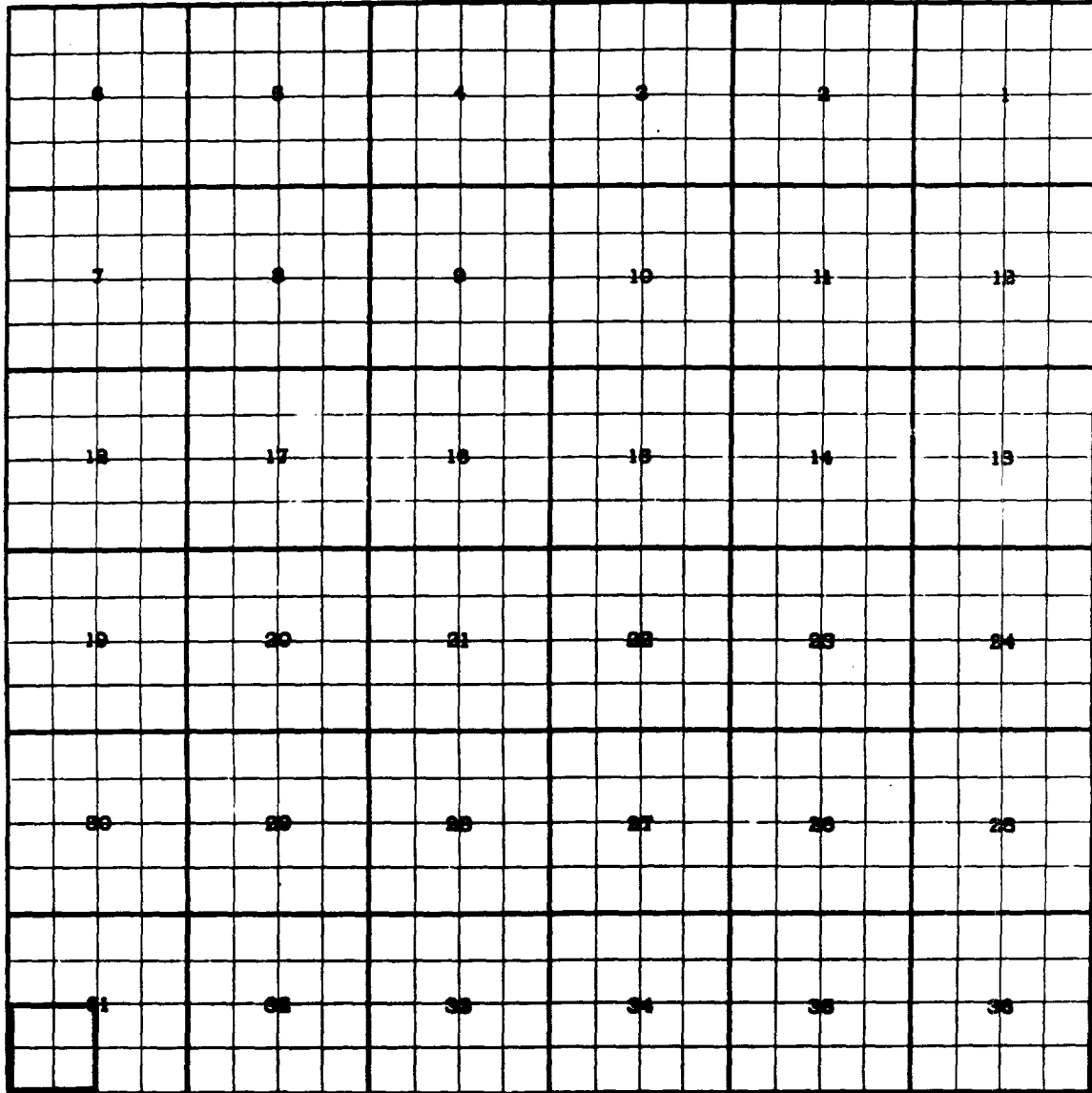
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

Description: $\frac{SE}{4}$ and $\frac{E}{2}SW\frac{1}{4}$ Sec. 33, $\frac{5}{8}$ Sec. 34 (R-8062, 10-31-85)
Amend horizontal limits to include $\frac{N}{2}$ and $\frac{SE}{4}$ sec. 4 only, T12S,
R37E (R-8062-A, 1-21-86) EXT: $\frac{SE}{4}$ sec. 33 (R-8513, 9-18-87)
EXT: $\frac{SE}{4}$ SEC 32, $\frac{SW}{4}$ SEC 33 (R-8603, 7/9/88) EXT: $\frac{SE}{4}$ SEC 35 (R-8668, 6/10/88)
EXT: $\frac{SE}{4}$ SEC 36 (R-9741, 9-1-89) EXT: $\frac{SE}{4}$ SEC 34 (R-9120, 3-1-90)

Musa (35)
Continental
H.B.P.
Alcorn
Schio
310754-77004
Spod: 8/20/77
Store

County LEA Pool SHIPP - STRAWN

TOWNSHIP 16 South, RANGE 38 East, NEW MEXICO PRINCIPAL MERIDIAN



EXT: SW/4 sec 31 (R-9741, 9-1-89)

County LeaPool Shipp-Strawn

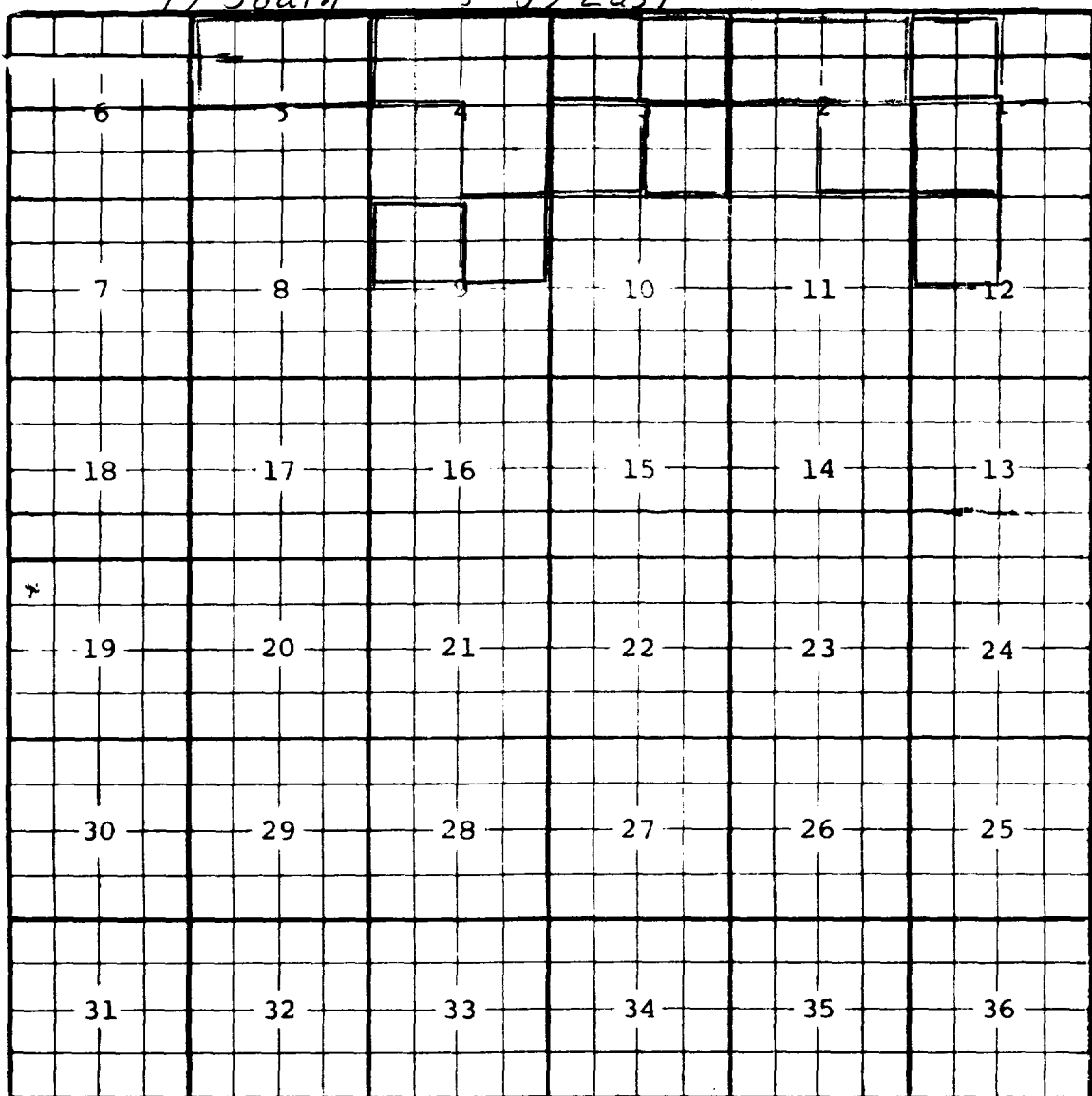
TOWNSHIP

17 South

Range

37 East

NMPM



Description: All Sec. 3, E/2 and E/2 W/2 Sec. 4, NE/4 and E/2 NW/4 Sec. 5, N/2 Sec. 10 (R-8062, 10-31-85)

Amend horizontal limits to be N/2 and SE/4 Sec. 4 (R-8062-A, 1-21-86)

Ext: NE/4 Sec. 9 (R-8214, 5-1-86) Ext: NW/4 Sec. 9 (R-8340, 11-3-86)

Ext: NW/4 Sec. 3 (R-8409, 3-7-87) Ext: NE/4 Sec. 3 (R-8451, 6-3-87)

Ext: SE/4 SEC 3 (R-8533, 10/28/87) EXT: N/2 SEC 5 (R-8603, 2/1/88)

EXT: N/2 SEC 2, SW/4 SEC 3 (R-8626, 4/1/88) EXT: SW/4 sec 2 (R-8856, 1-25-89)

EXT: SW/4 sec 1 (R-8901, 4-1-89) EXT: SE/4 sec 2, NW/4 sec 12 (R-9741, 9-1-89)