

CASE 9977 (Rechartered)

... mineral interests from the top of the
Wolfram to the base of the Morrow formation
underly...

... for any and all formations and/or pools
within said vertical extent spaced on 320 acres,
which presently includes but is not necessarily
limited to the Empire - Pennsylvanian Oil Pool, said
unit

Wm. L. Brown

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

IN THE MATTER OF THE APPLICATION
OF PACIFIC ENTERPRISES OIL COMPANY
(USA) FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO

ENTRY OF APPEARANCE

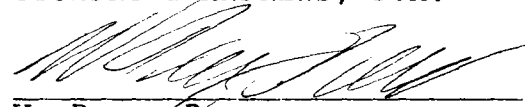
RECEIVED
JUN 12 1990
OIL CONSERVATION DIVISION
Case 9977

COMES NOW Montgomery & Andrews, P.A., and enters its
appearance in this matter on behalf of the applicant, Pacific
Enterprises Oil Company (USA).

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By


W. Perry Pearce
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 982-3873

Attorneys for Pacific Enterprises
Oil Company (USA)

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy
of the foregoing Entry of Appearance to be mailed first class,
postage prepaid, to all parties listed on Exhibit A, copy
attached hereto, this 12th day of June, 1990.

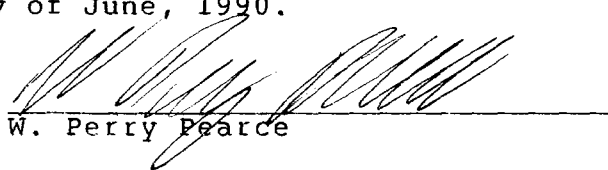

W. Perry Pearce

EXHIBIT "A"

The Moore Trust
310 W. Wall, Suite 404
Midland, Texas 79701
Attn: Ms. Cynthia L. Bennett

Conoco, Inc.
P.O. Box 460
Hobbs, New Mexico 88240\
Attn: Mr. Mike Boney

Fina Oil and Chemical Co.
P.O. Box 2990
Midland, Texas 79702
Attn: Mr. Kevin Pfister

ARCO Oil & Gas Company
P.O. Box 1610
Midland, Texas 79702
Attn: Mr. Tim Derigo

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210
Attn: Mr. Randy G. Patterson

DeKalb Energy Company
1625 Broadway
Denver, Colorado 80202
Attn: Mr. Keith C. Ranum

Marthon Oil Co.
P.O. Box 552
Midland, Texas 79702
Attn: Mr. Curtis Smith

PADILLA & SNYDER

ATTORNEYS AT LAW

200 W. MARCY, SUITE 216

P.O. BOX 2523

SANTA FE, NEW MEXICO 87504-2523

ERNEST L. PADILLA
MARY JO SNYDER

FAX 988-7592
AREA CODE 505

(505) 988-7577

*Case 9977
rms*

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June 12, 1990

JUN 12 1990

OIL CONSERVATION DIVISION

HAND-DELIVERED

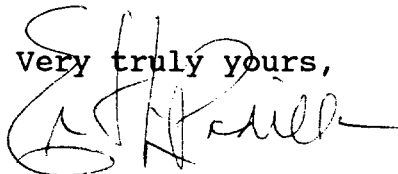
William J. LeMay
Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

Re: Pacific Enterprises Oil Company (USA)
Application For Compulsory Pooling
Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed please find our Withdrawal of Attorney in the
above-referenced application.

Very truly yours,



Ernest L. Padilla

:pmc

Enclosure as stated

cc: Terry Gant

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

IN THE MATTER OF THE APPLICATION
OF PACIFIC ENTERPRISES OIL COMPANY (USA)
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO

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JUN 12 1990

OIL CONSERVATION DIVISION

WITHDRAWAL OF ATTORNEY

ERNEST L. PADILLA hereby withdraws as attorney for
applicant, Pacific Enterprises Oil Company (USA).

PADILLA & SNYDER

By: 

Ernest L. Padilla
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN
KAREN AUBREY

CANDACE HAMANN CALLAHAN

JASON KELLAHIN
OF COUNSEL

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

June 5, 1990

HAND DELIVERED

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

RECEIVED

JUN 5 1990

Re: Pacific Enterprises Oil Company (USA)
for Compulsory Pooling
34 State Com No. 1 Well
E/2 Section 34, T17S, R28E
Eddy County, New Mexico

OIL CONSERVATION DIVISION

9977

Dear Mr. LeMay:

On behalf of Pacific Enterprises Oil Company (USA), we would appreciate you setting the enclosed Application for a public hearing on the Division's Examiner docket now scheduled for June 27, 1990.

By copy of this letter to all parties to be pooled, we are notifying them by certified mail-return receipt, 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. Those parties are directed to contact the Division or the Applicant's attorney to determine what additional rights they may have. 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.

Sincerely,


Ernest L. Padilla

xc: Mr. Terry Gant
Pacific Enterprises Oil Company (USA)
Post Office Box 3083
Midland, Texas 79702-3083

xc: Certified Mail-Return Receipt
All parties listed on Exhibit "A"
of Application

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

IN THE MATTER OF THE APPLICATION
OF PACIFIC ENTERPRISES OIL COMPANY (USA)
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.

RECEIVED
JUN 5 1990
OIL CONSERVATION DIVISION
CASE NO: 9977

A P P L I C A T I O N

COMES NOW, PACIFIC ENTERPRISES OIL COMPANY (USA),
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 E/2 Section 34, Township
17 South, Range 28 East, Eddy County, New Mexico. The above
described unit is to be dedicated to its 34 State Com No. 1
Well to be drilled at standard well location in said Section
34, and in support thereof would show:

1. Applicant is a working interest owner in the
E/2 of Section 34, T17S, R28E, N.M.P.M., Eddy County, New
Mexico.

2. Applicant desires to drill a well at a
standard location to a total depth of approximately 10,800
feet to test the Morrow formation, at a location 1980 feet
from the South line and 1980 feet from the East line of
Section 34.

3. Applicant has sought a voluntary agreement with all those parties shown on Exhibit "A" for the formation of appropriate spacing and proration unit for the drilling of the subject well, but has been unable to obtain a voluntary agreement.

4. 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 June 27, 1990.

5. In order to obtain its just and equitable share of the potential production underlying the above tract, Applicant needs an order pooling the mineral interests 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 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,

PADILLA & SNYDER

By: 

Ernest L. Padilla
Post Office Box 2523
Santa Fe, New Mexico 87504-2523
(505) 988-7577

ATTORNEYS FOR APPLICANT

EXHIBIT "A"

The Moore Trust
310 W. Wall, Suite 404
Midland, Texas 79701
Attn: Ms. Cynthia L. Bennett

Conoco, Inc.
P.O. Box 460
Hobbs, New Mexico 88240\
Attn: Mr. Mike Boney

Fina Oil and Chemical Co.
P.O. Box 2990
Midland, Texas 79702
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ARCO Oil & Gas Company
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105 South Fourth Street
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EL PATIO BUILDING

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

June 5, 1990

HAND DELIVERED

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OIL CONSERVATION DIVISION

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

Re: Pacific Enterprises Oil Company (USA)
for Compulsory Pooling
34 State Com No. 1 Well
E/2 Section 34, T17S, R28E
Eddy County, New Mexico

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Sincerely,



Ernest L. Padilla

xc: Mr. Terry Gant
Pacific Enterprises Oil Company (USA)
Post Office Box 3083
Midland, Texas 79702-3083

xc: Certified Mail-Return Receipt
All parties listed on Exhibit "A"
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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
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OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION
OF PACIFIC ENTERPRISES OIL COMPANY (USA)
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.

CASE NO: 9977

A P P L I C A T I O N

COMES NOW, PACIFIC ENTERPRISES OIL COMPANY (USA),
by and through its attorneys, KELLAHIN, KELLAHIN & AUBREY,
and in accordance with Section 70-2-17(c) NMSA (1978)
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feet to test the Morrow formation, at a location 1980 feet
from the South line and 1980 feet from the East line of
Section 34.

3. Applicant has sought a voluntary agreement with all those parties shown on Exhibit "A" for the formation of appropriate spacing and proration unit for the drilling of the subject well, but has been unable to obtain a voluntary agreement.

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Respectfully submitted,

PADILLA & SNYDER

By: 

Ernest L. Padilla
Post Office Box 2523
Santa Fe, New Mexico 87504-2523
(505) 988-7577

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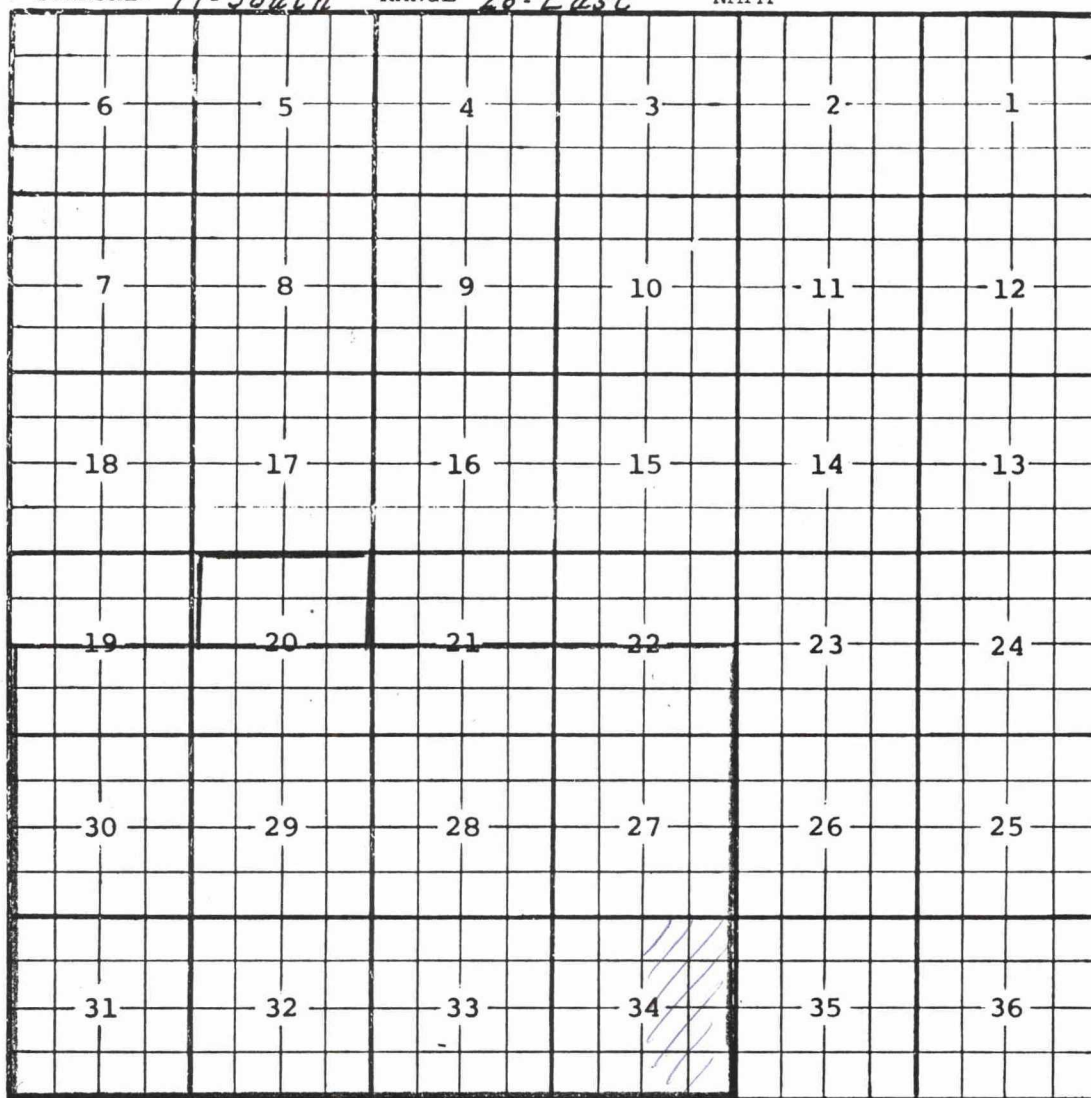
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Marthon Oil Co.
P.O. Box 552
Midland, Texas 79702
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COUNTY EddyPOOL Empire-Pennsylvanian GasTOWNSHIP 17-SouthRANGE 28-East

NMPM



Description: $\frac{1}{2}$ Sec. 19; $\frac{1}{2}$ Sec. 20; $\frac{1}{2}$ Sec. 21; $\frac{1}{2}$ Sec. 22, $\frac{1}{2}$ Secs. 27
thru 34 (R-391, 11-25-53). Special rules rescinded, pool now on
statewide spacing (R-5809, 9-20-78) EXT: $\frac{1}{2}$ sec 20 (R-7009, 6-19-82)

[illegible]