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November 5, 1990

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

10168

TELEPHONE (505) 982-4285

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Application of Pacific Enterprises Oil Company, USA for Compulsory Pooling, E/2, Section 16, T17S, R31E, Eddy County, New Mexico

Dear Mr. LeMay:

On behalf of Pacific Enterprises Oil Company, USA please find enclosed our Application for Compulsory Pooling which we would request be set for hearing on the next available Examiner's docket now scheduled for November 28, 1990.

By copy of this letter to all parties to be pooled, we are notifying them by certified mail, return-receipt requested, 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. 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.

Thomas Kellahin

KA/tic Enclosure

cc: Craig Clark Pacific Enterprises Oil Co., USA 10 Desta Drive, Suite 500-West Midland, Texas 79705

Mr. William J. LeMay November 5, 1990 Page 2

Certified Mail Return-Receipt All parties listed in Exhibit A of the Application, w/encl.

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

CASE NO.

APPLICATION

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 underlying the following described acreage in Section 16, T17S, R31E, Eddy County, New Mexico in the following described manner:

1. E/2 to form a 320 acre, more or less, gas spacing and proration unit for any and all formations and/or pools within said vertical limits below the top of the Wolfcamp developed on 320 acre gas well spacing including, but not limited to, the Fren-Pennsylvanian Gas Pool; and

- 2. 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.
- 3. 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 November 28, 1990.
- 4. In order to obtain its just and equitable share of the potential production underlying the above tract, Applicant needs an order pooling the mineral interest of those parties shown on Exhibit "A" as not having voluntarily committed their interest 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 approving the pooling of 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,

KELLAHIN, KELLAHIN & AUBREY

3y: '

W. Thomas Kellahin Post Office Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

EXHIBIT "A"

WORKING INTEREST OWNERS

Exxon Company, U.S.A P.O. Box 1600	50.00%
Midland, Texas 79702-1600	
Attn: Mr. Joe B. Thomas	
Anadarko Petroleum Corporation	12.5%
P.O. Box 2497	
Midland, Texas 79702	
Attn: Mr. Mike Goode	