

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

IN THE MATTER OF THE APPLICATION
OF SEAY EXPLORATION, INC. FOR
COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.

CASE NO: 10202

A P P L I C A T I O N

COMES NOW SEAY EXPLORATION, INC. by and through its attorneys,
SHERMAN AND HOWARD, and applies to the New Mexico Oil Conservation Division for
an order pooling all mineral interests as follows:

(1) From the surface of the earth to the base of the Abo formation
(approximately 7,800 feet subsurface) for the formation of a 160-acre gas spacing and
proration unit consisting of the NE $\frac{1}{4}$ of Section 6, Township 20 South, Range 39 East,
N.M.P.M., Lea County, New Mexico for any production so spaced; and

(2) From the surface of the earth to the base of the Abo formation
(approximately 7,800 feet subsurface) for formation of a 40-acre oil spacing and proration unit
consisting of the SW $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 6, Township 20 South, Range 39 East, N.M.P.M.,
Lea County, New Mexico, for any production so spaced.

In support thereof, Applicant states:

1. Applicant is a working interest owner in the NE $\frac{1}{4}$ (including an interest
under the SW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section 6, Township 20 South, Range 39 East, N.M.P.M., Lea
County, New Mexico as shown on Exhibit A hereto.

2. Applicant desires to drill its proposed well at a location 1,980 feet from the north line and 1,980 feet from the east line to a total depth of approximately 7,800 feet to test the Abo formation.

3. Applicant has sought the voluntary agreement of all parties shown on Exhibit B hereto for the formation of the appropriate spacing and proration unit for the drilling of the subject well, but has been unable to obtain a voluntary agreement from such parties.

4. Applicant has made a good-faith diligent effort to find the correct address of all interested persons entitled to receive notice pursuant to the Division's notice requirements. Applicant has, however, been unable to locate the parties shown on Exhibit C hereto.

5. Pursuant to the Division's notice requirements, Applicant has notified all parties shown on Exhibit B of its request for a hearing on January 10, 1991, by sending such parties a copy of this Application with a letter apprising such parties of the nature and pendency of the proposed action.

6. Pursuant to the Division's notice requirements, applicant has made a good-faith diligent effort to locate the parties listed on Exhibit C hereto and to find the correct address for such parties. Applicant has sent a copy of this Application with a letter to the parties listed on Exhibit C hereto at their last known address.

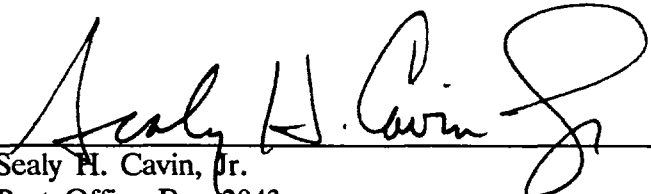
7. The pooling of interests will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

8. 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 the Applicant should be designated the operator of the well.

WHEREFORE, Applicant prays that this Application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on January 10, 1991, 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, completing, and equipping 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 completing and equipping the wells, and making such other further provisions as may be proper in the premises.

Respectfully submitted,

SHERMAN & HOWARD

By: 
Sealy H. Cavin, Jr.
Post Office Box 2043
Albuquerque, New Mexico 87103-2043
ATTORNEYS FOR APPLICANT

THIS IS EXHIBIT A TO THE APPLICATION OF SEAY C. EXPLORATION, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

THIS IS EXHIBIT B TO THE APPLICATION OF SEAY
EXPLORATION, INC. FOR COMPULSORY POOLING, LEA
COUNTY, NEW MEXICO

EXHIBIT B

MGF Oil Corporation
P.O. Box 21540
Tulsa, OK 74121-1540
ATTN: Pat Maxey

EXHIBIT C

Harold W. Herndon, Deceased
Fort Worth, Texas

Libby P. Wright
Alameda County, California

Jean Marie Johansen et vir, Dan Johansen
Weston, Wyoming

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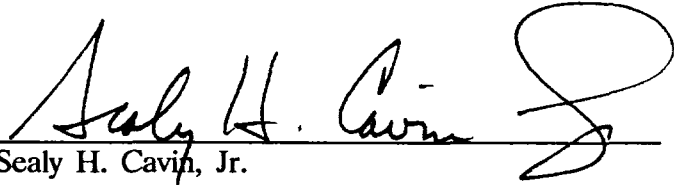
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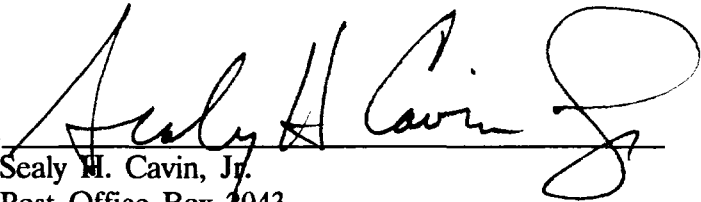
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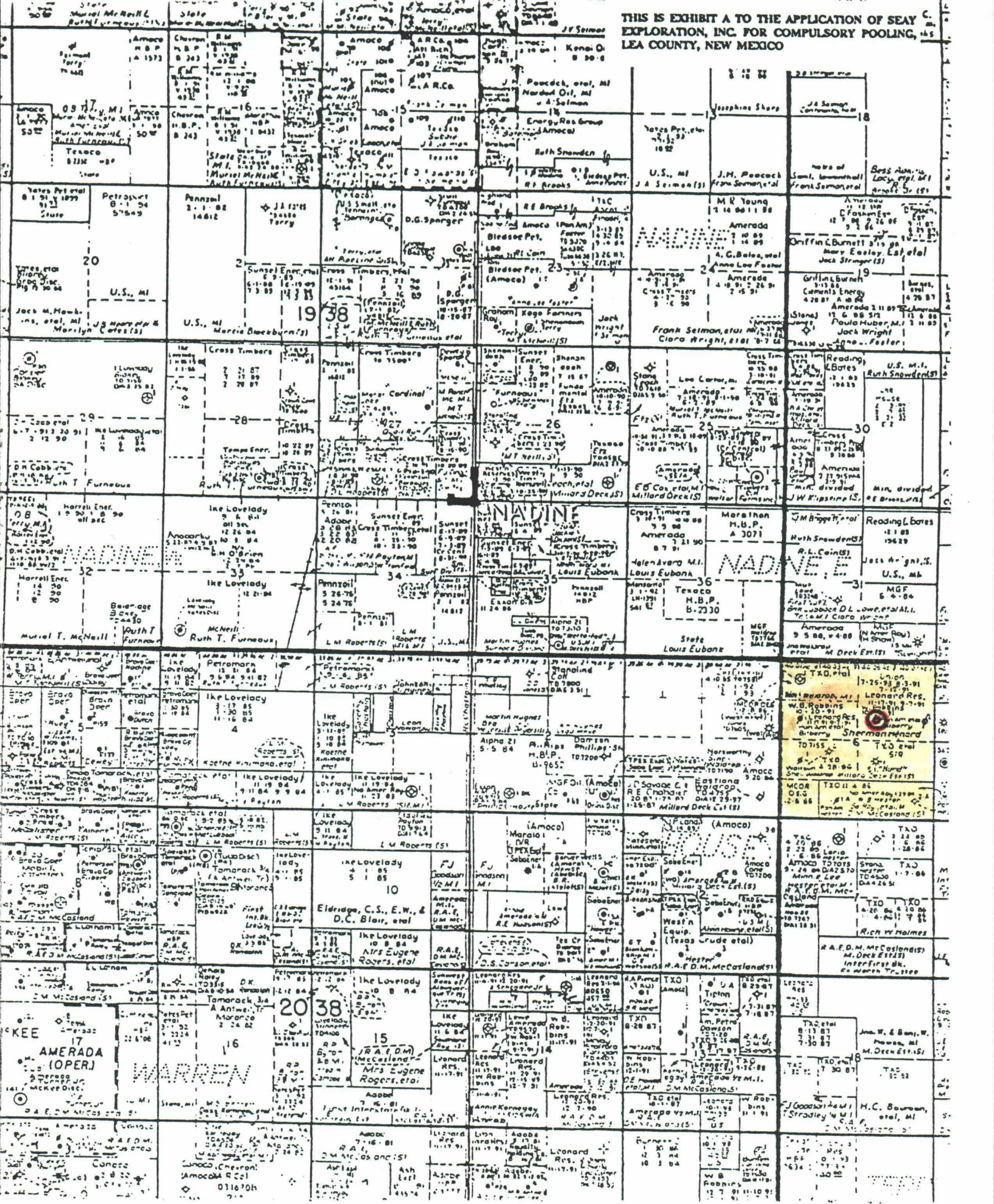


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