

# HINKLE, COX, EATON, COFFIELD & HENSLEY

ATTORNEYS AT LAW

500 MARQUETTE N.W., SUITE 800  
ALBUQUERQUE, NEW MEXICO 87102-2121  
(505) 768-1500  
FAX (505) 768-1529

OF COUNSEL  
O. M. CALHOUN  
MACK EASLEY  
JOE W. WOOD

CLARENCE E. HINKLE (190-1985)  
W. E. BONDURANT, JR. (1913-1973)  
ROY C. SNODGRASS, JR. (1941-1987)

December 11, 1990

700 UNITED BANK PLAZA  
POST OFFICE BOX 10  
ROSWELL, NEW MEXICO 88202  
(505) 622-6510  
FAX (505) 623-9332

2800 CLAYDESTA NATIONAL BANK BUILDING  
POST OFFICE BOX 3580  
MIDLAND, TEXAS 79702  
(915) 683-4691  
FAX (915) 683-6518

1700 TEAM BANK BUILDING  
POST OFFICE BOX 9238  
AMARILLO, TEXAS 79105  
(806) 372-5569  
FAX (806) 372-9761

218 MONTEZUMA  
POST OFFICE BOX 2068  
SANTA FE, NEW MEXICO 87504  
(505) 982-4554

LEWIS C. COX  
PAUL W. EATON  
CONRAD E. COFFIELD  
HAROLD L. HENSLEY, JR.  
STUART D. SHANOR  
ERIC D. JANPHERE  
C. D. MARTIN  
PAUL J. KELLY, JR.  
MARSHALL G. MARTIN  
DAEN M. LOPEZ  
DOUGLAS L. LUNSFORD  
JOHN J. KELLY  
T. CALDER EZZELL, JR.  
WILLIAM B. BURFORD\*  
RICHARD E. OLSON  
RICHARD R. WILFONG\*  
THOMAS J. MCBRIDE  
STEVEN D. ARNOLD  
JAMES J. WECHSLER  
NANCY S. CUSACK  
JEFFREY L. FORNACIARI  
JEFFREY D. HEWITT  
JAMES BRUCE  
JERRY F. SHACKELFORD\*  
JEFFREY W. HELBERG\*  
ALBERT L. PITTS  
THOMAS M. HNASKO  
JOHN C. CHAMBERS\*  
MICHAEL A. GROSS  
THOMAS D. HAINES, JR.  
FRANKLIN H. MCCALLUM\*  
GREGORY J. NIBERT

DAVID T. MARKETTE\*  
MARK C. DOW  
KAREN M. RICHARDSON\*  
FRED W. SCHWENDIMANN  
JAMES M. HUDSON  
RAYMOND HAMILTON  
STANLEY K. KOTOVSKY  
BETTY H. LITTLE\*  
JEFFREY S. BAIRD\*  
RUTH S. MUSGRAVE  
HOWARD R. THOMAS  
PATRICIA A. WATTS  
NANCY AUGUSTUS  
MACDONNELL GORDON  
REBECCA NICHOLS JOHNSON  
PAUL R. NEWTON  
WILLIAM R. JOHNSON  
ELLEN S. CASEY  
S. BARRY PAISNER  
MARGARET CARTER LUDEWIG  
MARTIN MEYERS  
GREGORY S. WHEELER  
ANDREW J. CLOUTIER  
JAMES A. GILLESPIE  
GARY W. LARSON  
STEPHANIE LANDRY  
JERRY D. WORSHAM II  
JOHN R. KULSETH, JR.  
TONY CONNERS\*

\*NOT LICENSED IN NEW MEXICO

## VIA FEDERAL EXPRESS

Ms. Florene Davidson  
New Mexico Oil Conservation  
Division  
310 Old Santa Fe Trail  
Room 206  
Santa Fe, New Mexico 87501

Dear Florene:

Enclosed for filing are an original and two copies of each of the following Applications:

### A. For Santa Fe Energy:

1. Application for Compulsory Pooling ( $S\frac{1}{2}$  Section 17-24 South-25 East).
2. Application for Unorthodox Oil Well Location ( $S\frac{1}{2}SE\frac{1}{4}$  Section 5-18 South-33 East).
3. Application for Compulsory Pooling ( $W\frac{1}{2}NW\frac{1}{4}$  Section 8-18 South-33 East).

### B. For Mewbourne Oil Company:

1. Application for Compulsory Pooling ( $E\frac{1}{2}$  Section 29-20 South-27 East).
2. Application for Unorthodox Gas Well Location ( $N\frac{1}{2}$  Section 14-17 South-26 East).

RECEIVED

DEC 12 1990

OIL CONSERVATION DIV.  
SANTA FE

10214

Ms. Florene Davidson  
December 11, 1990  
Page 2

C. For The Petroleum Corporation of Delaware:

1. Application for Compulsory Pooling (N $\frac{1}{2}$  Section 1-20 South-29 East).

Please set these cases for the January 10, 1991 Examiner Hearing. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

By:  James Bruce

JB:le  
Enclosures

RECEIVED

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

DEC 12 1990

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO.

OIL CONSERVATION DIV  
SANTA FE

No. 10314

APPLICATION

Mewbourne Oil Company hereby makes application for an order pooling all interests from the surface to the base of the Morrow formation underlying the E $\frac{1}{2}$  of Section 29, Township 20 South, Range 27 East, N.M.P.M., Eddy County, New Mexico, and in support thereof states:

1. Applicant is an interest owner and has the right to drill a well in the E $\frac{1}{2}$  of said Section 29.
2. Applicant proposes to drill its Fed. Z No. 1 Well in the E $\frac{1}{2}$  of Section 29, at an orthodox location 1980 feet from the North line and 660 feet from the East line of the Section, to a depth sufficient to test the Morrow formation (approximately 10,950 feet), and seeks to dedicate the following acreage to the well:
  - (a) The E $\frac{1}{2}$  of Section 29 for all pools or formations spaced on 320 acres;
  - (b) The NE $\frac{1}{4}$  of Section 29 for all pools or formations spaced on 160 acres;
  - (c) The S $\frac{1}{2}$ NE $\frac{1}{4}$  of Section 29 for all pools or formations spaced on 80 acres; and
  - (d) The SE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 29 for all pools or formations spaced on 40 acres.

3. Applicant has in good faith sought to join all other mineral or leasehold interest owners in the E $\frac{1}{2}$  of Section 29 for the purposes set forth herein.

4. Although Applicant attempted to obtain voluntary agreements from all mineral or leasehold interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their acreage. Therefore, Applicant seeks an order pooling all mineral and leasehold interest owners underlying the E $\frac{1}{2}$  of Section 29, as described above, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).

5. Applicant requests the Division to consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating charges and costs charged for supervision. Applicant requests that it be designated as operator of the well and that the Division set a penalty of 200% for the risk involved in drilling the well.

6. The pooling of all interests underlying the E $\frac{1}{2}$  of Section 29, as described above, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

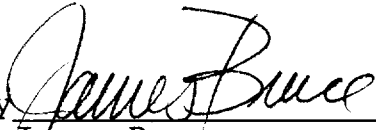
7. Applicant requests that this matter be heard at the January 10, 1991 Examiner hearing.

WHEREFORE, Applicant requests that the Division  
grant the relief requested above.

Dated: 12/1/90.

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

By   
James Bruce  
500 Marquette, N.W.  
Suite 800  
Albuquerque, New Mexico 87102  
(505) 768-1500

Attorneys for Applicant