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July 20, 1987

RECEIVED

JUL 20 1987

OIL CONSERVATION DIVISION

Case 9191

HAND DELIVERED

Florene Davidson
OCD Staff Specialist
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
for Compulsory Pooling, Lea County, New Mexico.

Dear Florene:

Enclosed for filing please find the Application of Amerind
Oil Company in the above-referenced case which Amerind requests
be scheduled for the examiner hearing on August 12, 1987.

Very truly yours,

Will

WILLIAM F. CARR

WFC/ab
Enclosures
cc: Robert C. Liebrock
Bill Seltzer

BEFORE THE
OIL CONSERVATION DIVISION
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

RECEIVED

JUL 20 1987

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF
AMERIND OIL COMPANY FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 9191

APPLICATION

COMES NOW AMERIND OIL COMPANY, by and through its undersigned attorneys, and as provided by Section 70-2-17, N.M.S.A. (1978), hereby makes application for an order pooling all of the mineral interests in the Strawn and Atoka formations (Casey-Strawn Pool) in and under a standard spacing unit to be comprised of the S/2 SE/4 of Section 28, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof would show the Division:

1. Applicant owns or represents approximately 52% of the working interest in and under the S/2 SE/4 of Section 28, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be located at a standard location on said unit.

3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the S/2 SE/4 of said Section 28, except for the working interest owners and mineral interest owners identified on Exhibit A to this application.

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

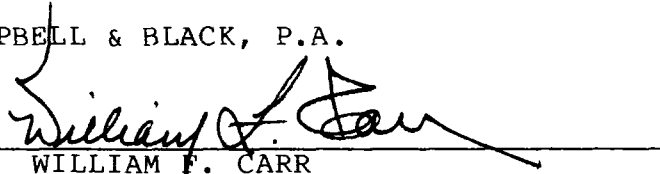
5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well on the pooled spacing or proration unit.

WHEREFORE, Applicant prays that this application be set for hearing before a duly appointed examiner of the Oil Conservation Division on August 12, 1987, 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 in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By

A handwritten signature in dark ink, appearing to read "William F. Carr", is written over a horizontal line.

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

ATTORNEYS FOR AMERIND OIL COMPANY

EXHIBIT "A"

Case 9191

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AMERIND OIL COMPANY

JUL 20 1967

INTEREST OWNER LIST

OIL CONSERVATION DIVISION

Florence M. and Frank B. Balkam
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Conoco, Inc.
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Doris Johnson
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Kenneth Schmitz
Forrest Schmitz
Joyce Evans
Glennys Croxton
Patricia Osgood
Jean Stone
Gale Harrington
Phyllis Beaver
Cheryl L. Shader
Bruce Schmitz
Jane Marie Schmitz Webb
Lloyd Schmitz, Jr.
the Heirs and/or Devisees of
Dean Schmitz, deceased
Lois Schmitz Flack
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Mason City, Iowa 50401

Harry and Laura C. Schrader
Rudd, Iowa 50471

Flo Schroeder, the unknown
Heir and/or Devisee of
Lola Helvick, deceased
address unknown

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C. E. Werthenbach, Amerett
Schmitz, Individually and as
Executrix of the Estate of
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