January 22, 1988

Energy and Minerals Department Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Case 9309

Re: Cook No. 1 Well <u>Township 2 South, Range 29 East, NMPM</u> Section 34: N/2 Roosevelt County, New Mexico

Gentlemen:

Enclosed for filing, please find three copies of the Application of Marshall Pipe & Supply Company for an Unorthodox Well Location, Roosevelt County, New Mexico.

We ask that this matter be set for hearing before an Examiner on February 17, 1988, and that we be furnished with a docket of said hearing.

Thank you.

Sincerely yours,

DICKERSON, FISK & VANDIVER

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Chad Dickerson

CD:pvw Enclosures

cc w/enclosure:

Marshall Pipe & Supply Company Ms. Leslie Bentz

Chad Dickerson J

John Fisk David R. Vandiver

Rebecca Reese Dickerson

DICKERSON, FISK & VANDIVER ATTORNEYS AT LAW

Seventh & Mahone / Suite E / Artesia, New Mexico 88210 / (505) 746-9841

BEFORE THE OIL CONSERVATION DIVISION

OF THE STATE OF NEW MEXICO

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IN THE MATTER OF THE APPLICATION OF MARSHALL PIPE & SUPPLY COMPANY FOR AN UNORTHODOX WELL LOCATION, ROOSEVELT COUNTY, NEW MEXICO

CASE NO. 9309

APPLICATION

COMES NOW Marshall Pipe & Supply Company, by its attorneys, and in support hereof, respectfully states:

 Applicant is the operator of all formations from the surface through the base of the Ordovician formation, underlying:

Township 2 South, Range 29 East, N.M.P.M.

Section 34: N/2

containing 320 acres, more or less,

and proposes to drill its Cook No. 1 Well, at a point located 330 feet from the north line and 1,980 feet from the east line of said Section 34, and to dedicate said N/2 to the well.

2. The Applicant seeks an exception to the well location requirements of Rule 104 of the Oil Conservation Division to permit the drilling of the well at the above mentioned unorthodox location to a depth sufficient to adequately test all formations from the surface through the base of the Ordovician formation, which may be developed on 320-acre spacing.

3. A standard 320-acre proration unit comprising the N/2 of said Section 34 should be dedicated to such well or to such lesser portion thereof as is reasonably shown to be productive of oil and gas.

4. The approval of this Application will afford Applicant the opportunity to produce its just and equitable share of oil and gas, will prevent economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells, and will otherwise prevent waste and protect correlative rights.

WHEREFORE, Applicant prays:

A. That this Application be set for hearing before an examiner and that notice of said hearing be given as required by law.

B. That upon hearing the Division enter its order granting Applicant permission to drill its Cook No. 1 Well at a point 330 feet from the north line and 1,980 feet from the east line of said Section 34, and to dedicate the N/2 of Section 34 to said well.

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C. And for such other and further relief as may be just in the premises.

MARSHALL PIPE & SUPPLY COMPANY

Dukun By: (Chad Dickerson

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Attorneys for Applicant