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Santa Fé, New Mexico 87504-2265  
March 7, 1988

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

RECEIVED

MAR 8 1988

OIL CONSERVATION DIVISION

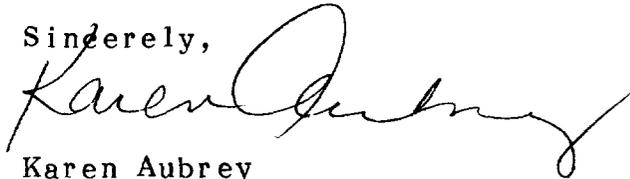
Re: Sun Exploration & Production Company

Dear Mr. LeMay:

Enclosed is an Application for Compulsory Pooling which we are filing on behalf of Sun Exploration and Production Company. Please set this matter for hearing on March 30, 1988.

We are sending a copy of this letter and the Application by certified mail to the owner of the uncommitted 75% working interest as required by Rule 1207(a)3.

Sincerely,



Karen Aubrey

KA/sm  
enclosure

cc: Penzoil Company  
Mike Mogenthaler,  
Sun Exploration & Production Company

Case 9335

STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY AND MINERALS  
OIL CONSERVATION DIVISION

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MAR 8 1963

IN THE MATTER OF THE APPLICATION  
OF SUN EXPLORATION AND PRODUCTION  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO

CASE NO.

OIL CONSERVATION DIVISION

9335

~~AMENDED APPLICATION~~

COMES NOW, Sun Exploration and Production Company and applies to the Oil Conservation Division of the State of New Mexico for an order pooling all mineral interests from the surface to the base of the Atoka (320 acres) and the Morrow (320 acres) formations, to a maximum depth of 13,700 feet or the base of the Morrow formation, whichever is deeper, underlying the N/2, Section 33, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico for the formation of a proration and spacing unit for said production and in support thereof would show the Division:

1. Applicant is the owner of the right to drill and develop the N/2 of Section 33, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico.

2. Applicant proposes to drill a well at a standard location in the N/2 of Section 33 and proposes to dedicate the N/2 of Section 33 to the well in the event the well is productive in the Atoka or Morrow formations. Said well will be located approximately 23 miles W/SW of Hobbs, New Mexico.

3. Applicant has sought to obtain the voluntary cooperation and participation of all parties.

4. In order to obtain its just and equitable share of the production underlying the above lands, Applicant needs an order pooling the mineral interests involved.

5. Those who have not consented to join in the drilling of the well, with their addresses, to the best of Applicant's knowledge and belief, are as follows:

Lonnie Whitfield  
Pennzoil Company  
Pennzoil Place  
P. O. Box 2967  
Houston, Texas 77252

The foregoing working interest totals 75% 2962.

6. The party named in paragraph 5 above has been furnished a copy of this Application in accordance with NMOCC Rule 1207.

WHEREFORE, Applicant prays that this matter be set for hearing on March 30, 1988 before the Division's duly appointed Examiner, and that, after notice and hearing, the Division enter its order pooling the working interests described herein.

Non-consenting working interest owners are hereby notified of their right to attend the hearing and to present evidence in support of or in opposition to this Application. Applicant further prays that it be named operator of said well, that the Order make provision for Applicant to recover, out of production, its costs of drilling the subject well, completing and equipping it, all costs of operation, including costs of supervision and a risk factor in the amount of two hundred percent (200%) for the drilling of the Well and for such other and further relief as may be appropriate.

Respectfully submitted,

Sun Exploration & Production  
Company

By:

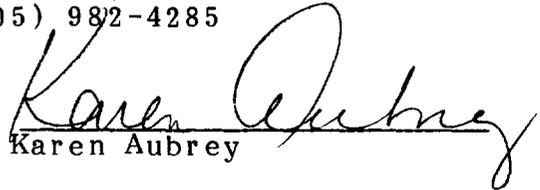
KELLAHIN, KELLAHIN & AUBREY

Post Office Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

By

  
Karen Aubrey

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Application to be mailed to:

Lonnie Whitfield  
Pennzoil Company  
Pennzoil Place  
P. O. Box 2967  
Houston, Texas 77252

by certified mail, return receipt requested on this 8<sup>th</sup> day of March, 1988.

Cassie Aguilar