BEFORE THE OIL CONSERVATION DIVISION

OF THE STATE OF NEW MEXICO

RECEIVED

MAY 2 10 3

IN THE MATTER OF THE APPLICATION OF TXO PRODUCTION CORP. FOR DIRECTIONAL DRILLING AND AN UNORTHODOX WELL LOCATION, LEA COUNTY, NEW MEXICO

CASE NO. CIL CONSERVATION DIVISION

APPLICATION

COMES NOW TXO Production Corp., by its attorneys, and in support hereof, respectfully states:

Applicant is the operator of all formations from the surface down to the base of the Devonian formation, underlying:

Township 11 South, Range 37 East, N.M.P.M.

Section 36: E/2

containing 320 acres, more or less,

and proposes to re-enter and deepen the Humble State "C" No. 1 Well, located at a point 2,310 feet from the south line and 1,650 feet from the east line (Unit J) of said Section 36, to a depth sufficient to test the Devonian formation, at approximately. 12,500 feet. Applicant proposes to directionally drill said well to come within 50 feet of the following target bottomhole locations (both of which are unorthodox locations):

> In the Wolfcamp formation - 2,530 feet from (a) the north line and 1,600 feet from the east line of said Section 36; and

(b) In the Devonian formation - 2,100 feet from the north line and 1,550 feet from the east line of said Section 36;

and to dedicate the SW/4 NE/4 of said Section 36 to the well.

- 2. In the event the re-entry of the Humble State "C" No. 1 Well is impracticable, Applicant proposes to re-enter and deepen the Heyco State "36" No. 1 Well, located at a point 1,650 feet from the north line and 990 feet from the east line (Unit H) of said Section 36, and to directionally drill said well to come within 50 feet of the target bottomhole locations described in 1 (a) and (b) above.
- 3. Applicant should be authorized to directionally drill its well to come within 50 feet of the target bottomhole locations described in 1 (a) and (b) above.
- 4. The Applicant seeks an exception to the well location requirements of Rule 104 of the Oil Conservation Division to permit the re-entry and deepening of the Humble State "C" No. 1 Well or, in the event such re-entry proves to be impracticable, to permit Applicant to re-enter and deepen the Heyco State "36" No. 1 Well at the above mentioned unorthodox locations, for all formations in Unit G of said Section 36 which may be developed on 40-acre spacing.
- 5. A standard 40-acre proration unit comprising the SW/4 NE,'4 of said Section 36 should be dedicated to such well or to such lesser portion thereof as is reasonably shown to be productive of oil and gas.

6. 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 examine: 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 re-enter the Humble State "C" No. 1 Well, at a point located 2,310 feet from the south line and 1,650 feet from the east line of said Section 36 or, in the event such re-entry proves impracticable, granting Applicant permission to re-enter the Heyco State "36" No. 1 Well located at a point 1,650 feet from the north line and 990 feet from the east line of said Section 36, and in either event to directionally drill said well to come within 50 feet of the target bottomhole locations described in 1 (a) and (b) above, and to dedicate the SW/4 NE/4 of Section 36 to said well for production from all formations which may be developed on 40-acre spacing.

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

TXO PRODUCTION CORP.

Chad Dickerson

DICKERSON, FISK & VANDIVER Seventh and Mahone, Suite E Artesia, New Mexico 88210 (505) 746-9841

Attorneys for Applicant

May 4, 1988

Case 9383

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

Dukuvas

Township 11 South, Range 37 East, NMPM Section 36: E/2 Re:

Lea County, New Mexico

Gentlemen:

Enclosed for filing, please find three copies of the Amended Application of TXO Production Corp. for Directional Drilling and an Unorthodox Well Location, Lea County, New Mexico.

This matter has been set for hearing before an Examiner on May 25, 1988.

Thank you.

Sincerely yours,

DICKERSON, FISK & VANDIVER

Chad Dickerson

CD:pvw Enclosures

Mr. Richard Coats cc w/enclosure:

Commissioner of Public Lands

DICKERSON, FISK & VANDIVER ATTORNEYS AT LAW