KELLAHIN, KELLAHIN AND AUBREY

Attorneys at Law
El Patio - 117 North Guadalupe
Post Office Box 2265
Santa Fe, New Mexico 87504-2265

May 2, 1988

Telephone 982-4285 Area Code 505

GAV En-

WEAL \$ 188

Mr. William J. LeMay Oil Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87504

OIL COHDERVATION DIVISION

Care 9393

"Hand Delivered"

Re: Tenneco Oil Company for
Well-Head Price Ceiling Category

Determination for certain Infill Wells, for Exception to Order R-1670-T, and for Well Location Requirements, Blanco Mesa-Verde

Gas Pool, San Juan County,

New Mexico

Dear Mr. LeMay:

W. Thomas Kellahin

Karen Aubrey

Jason Kellahin Of Counsel

On behalf of Tenneco Oil Company, please set the enclosed application for hearing on the next available examiner's docket now set for May 25, 1988.

By copy of this letter and application sent certified mail return-receipt to all offset operators, we are notifying each of them of the right to appear at the hearing either in support or in opposition to this application. Should any such party desire more information about this matter or about the procedures to hearing this application, they may call the Division or the undersigned.

. Thomas Bellahi

WTK:ca Enc.

cc: David Motloch, Esq. (Tenneco)
 Mr. Tim Hower (Tenneco)

"Certified-Return Receipt Requested"

All Interested Parties in Application

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

TECHIVED

1988

IN THE MATTER OF THE APPLICATION OF TENNECO OIL COMPANY FOR WELL-HEAD PRICE CEILING CATEGORY DETERMINATION FOR CERTAIN INFILL WELLS, FOR EXCEPTION TO ORDER R-1670-T, AND EXCEPTIONS FROM WELL LOCATION REQUIREMENTS, BLANCO MESA-VERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE: 9393

APPLICATION

COMES NOW TENNECO OIL COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for an order for well-head price ceiling category (Section 103) determination that sixteen infill wells in the Blanco Mesa Verde Gas Pool qualify as New Onshore Production Wells under the exceptions of Section 271.304 and 271.305 of the FERC regulations implementing the Natural Gas Policy Act of 1978, for exception from Order R-1670-T and from well location requirements of the Blanco Mesa Verde Pool Rules, and in support thereof would show the Division:

1. Applicant is the operator of sixteen Blanco Mesa Verde 320-acre spacing and proration units, each of which currently has an original well and an infill well.

- 2. Applicant has determined that in each instance, the original well has reached a stage of depletion whereby a second infill well is now necessary to effectively and efficiently drain a portion of the reservoir covered by the proration and spacing unit which cannot be effectively and efficiently drained by any existing well within the proration unit.
- 3. Applicant seeks this determination prior to drilling each of the subject wells as exceptions which will qualify under the higher "New Onshore Production Well" category (Section 103) of the FERC regulations.
- 4. The following are the subject infill wells for which the applicant seeks the necessary jurisdictional agency findings and exceptions from Division Order R-1670-T and Order R-6013 (Administrative procedures for Infill Wells):

EXH.	WELL NAME	LOCATION				SPACING UNIT			
1	Fields LS 7B	965'	FNL 8	2060'	FEL	N/2	Sec 34,	T32N,	RllW
2	Neil LS 8B	2055'	FNL 8	885 '	\mathtt{FEL}	E/2,	Sec 4,	T31N,	RllW
3	Gartner LS 1B	1720'	FSL &	1610'	FWL	W/2	Sec 28,	T3ØN,	R8W
4	Gartner LS 5B	1620'	FSL 8	1005'	FWL	W/2,	Sec 27,	T3ØN,	R8W
5	Gartner LS 6B	300'	FNL 8	1230'	FEL	E/2,	Sec 27,	T3ØN,	R8W
6	Mudge LS 9B	2160'	FNL 8	395'	FEL	E/2,	Sec 3,	T31N,	RllW
7	Mudge LS 8B	845'	FNL 8	1740'	FEL	E/2,	Sec 12,	T31N,	RllW
8	Day A LS 3B	79Ø'	FNL 8	1800'	FEL	E/2,	Sec 8,	T29N,	R8W
9	Hughes A LS 2B	1125'	FNL 8	1828'	FEL	E/2,	Sec 27,	T29N,	R8W
10	Scott LS 3B	79Ø'	FSL 8	1850'	FWL	S/2,	Sec 29,	T32N,	RlØW
11	Riddle F LS 1B	1850'	FSL 8	1500'	FWL	W/2,	Sec 17,	T28N,	R8W
12	Mudge LS 5B	900'	FSL 8	1190'	FWL	W/2,	Sec 3,	T31N,	RllW
13	Jacques LS 1B	79Ø'	FNL 8	79Ø'	FEL	E/2,	Sec 29,	T31N,	R9W
14	Jones A LS 2B	1650'	FSL 8	990'	FWL	s/2,	Sec 11,	T28N,	r8w
15	Fields LS 4B	185Ø'	FNL 8	145Ø'	\mathtt{FEL}	E/2,	Sec 28,	T32N,	RllW
16	Barrett LS 2B	79Ø'	FNL 8	790'	\mathtt{FEL}	E/2,	Sec 19,	T31N,	R9W

- 5. In addition, applicant seeks approval of the respective well locations as exceptions to the well location requirements (Rule 2) of the Special Rules and Regulations of the Blanco Mesa Verde Gas Pool.
- 6. Copies of the plat showing the spacing units, the Blanco Mesa Verde wells and the proposed infill wells are shown on Exhibit 1-16 attached hereto and incorporated by reference.
- 7. Attached as Exhibit 17 is a list of the offset operators who have been notified of this application pursuant to Division Notice Rules.
- 8. Applicant requests that this application be set for hearing on the Examiner docket now scheduled for May 25, 1988.

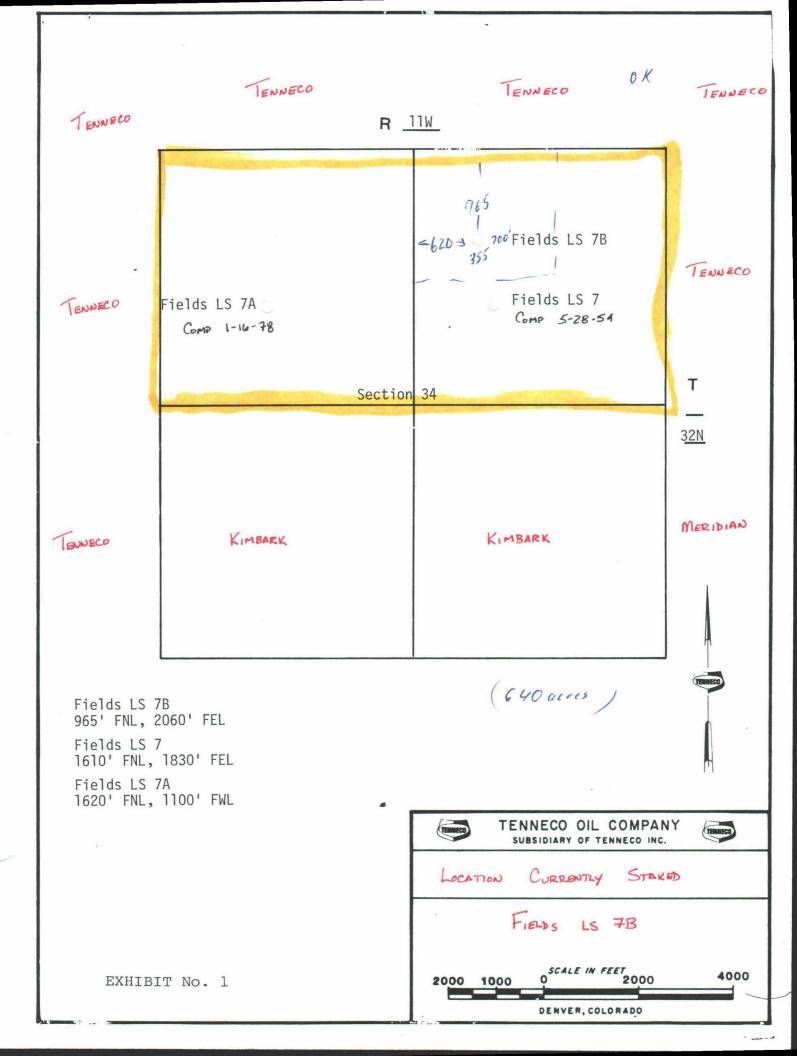
WHEREFORE, APPLICANT requests that after notice and hearing the application be granted as required.

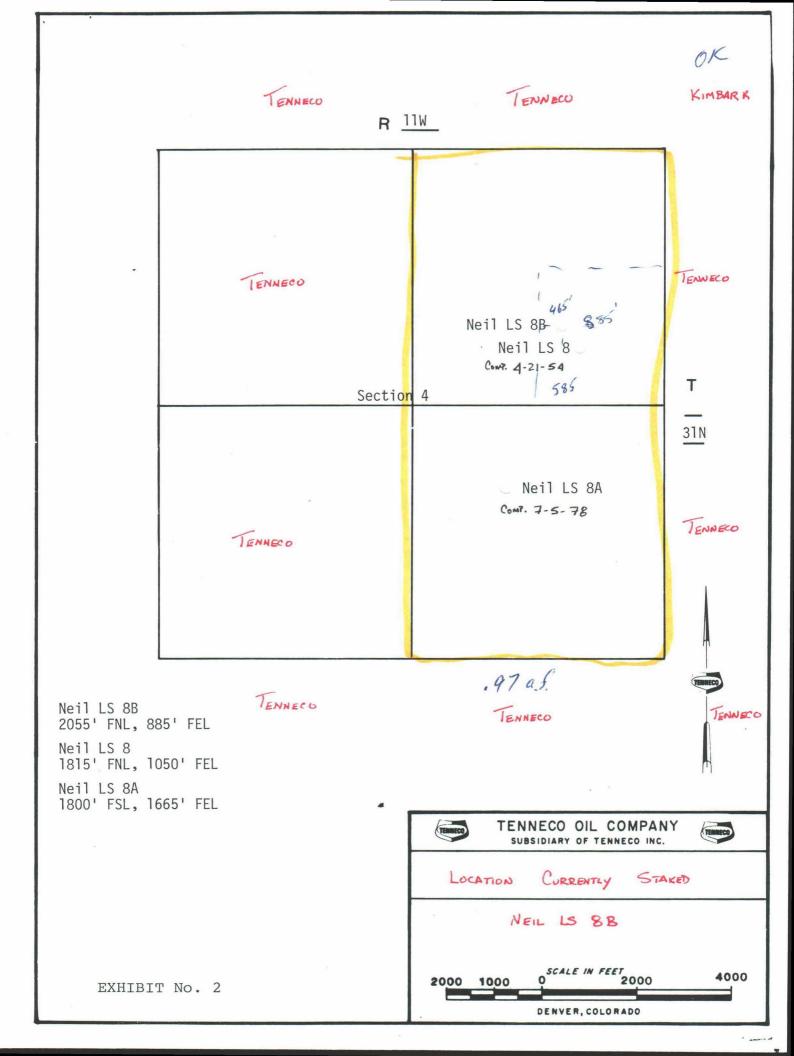
Respectfully submitted:

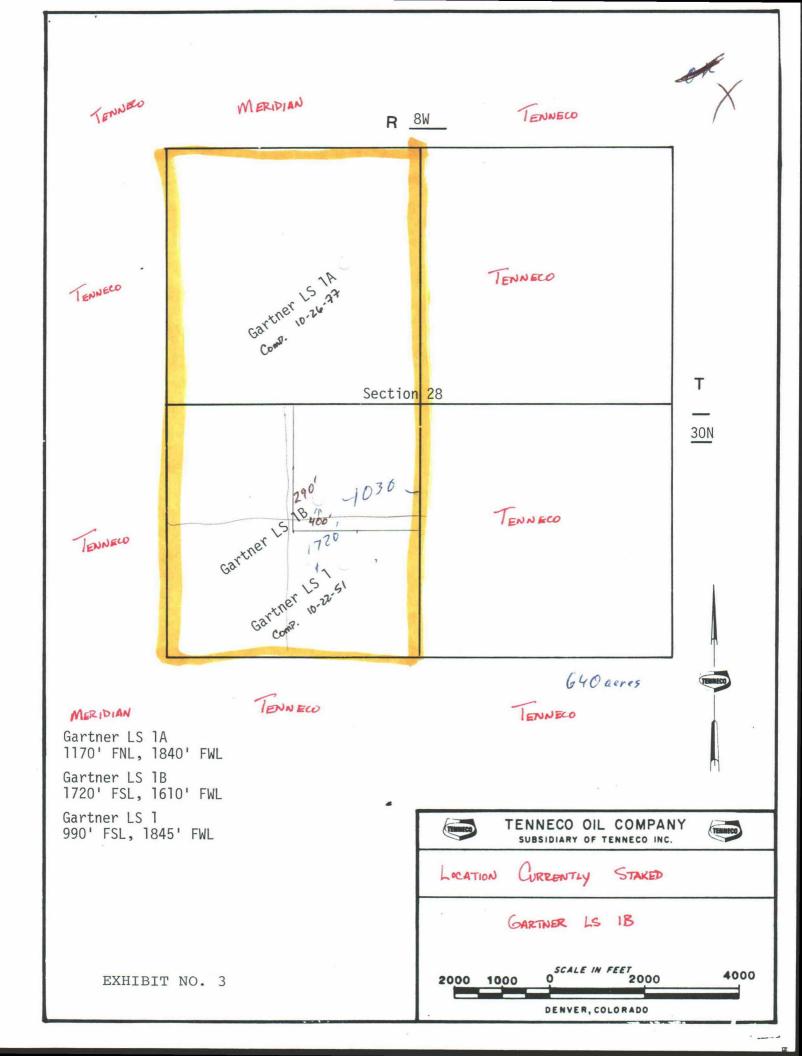
W. Thomas Kellahin, Esq.

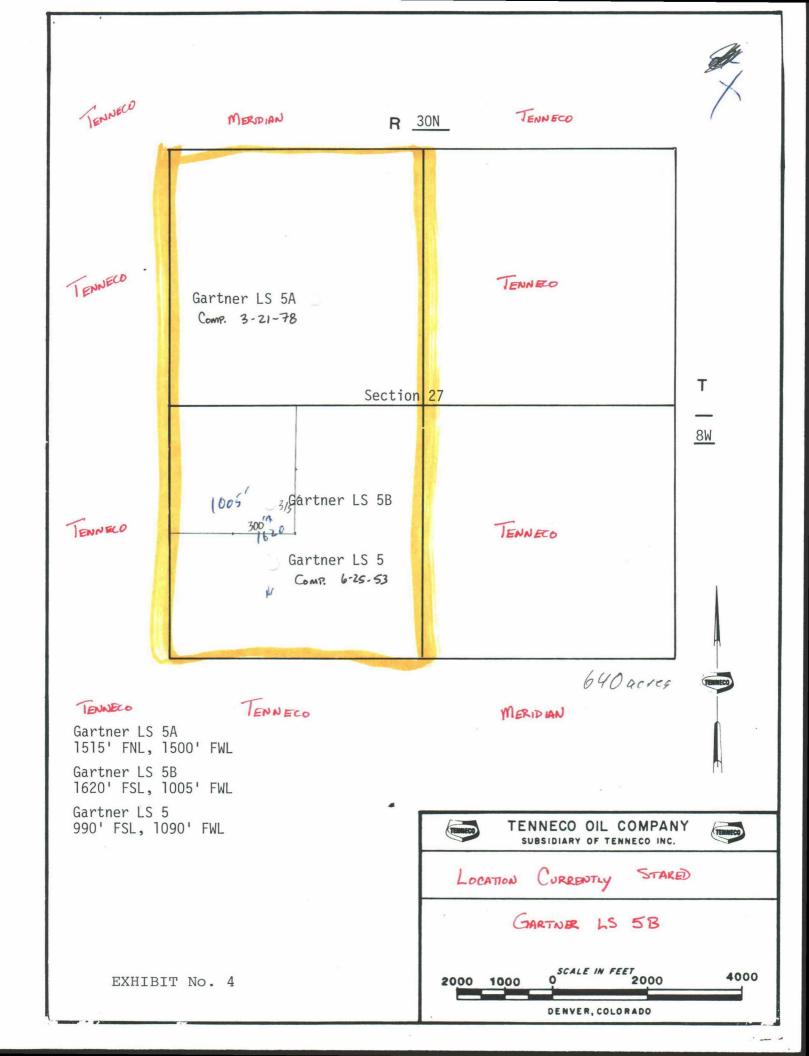
P. O. Box 2265

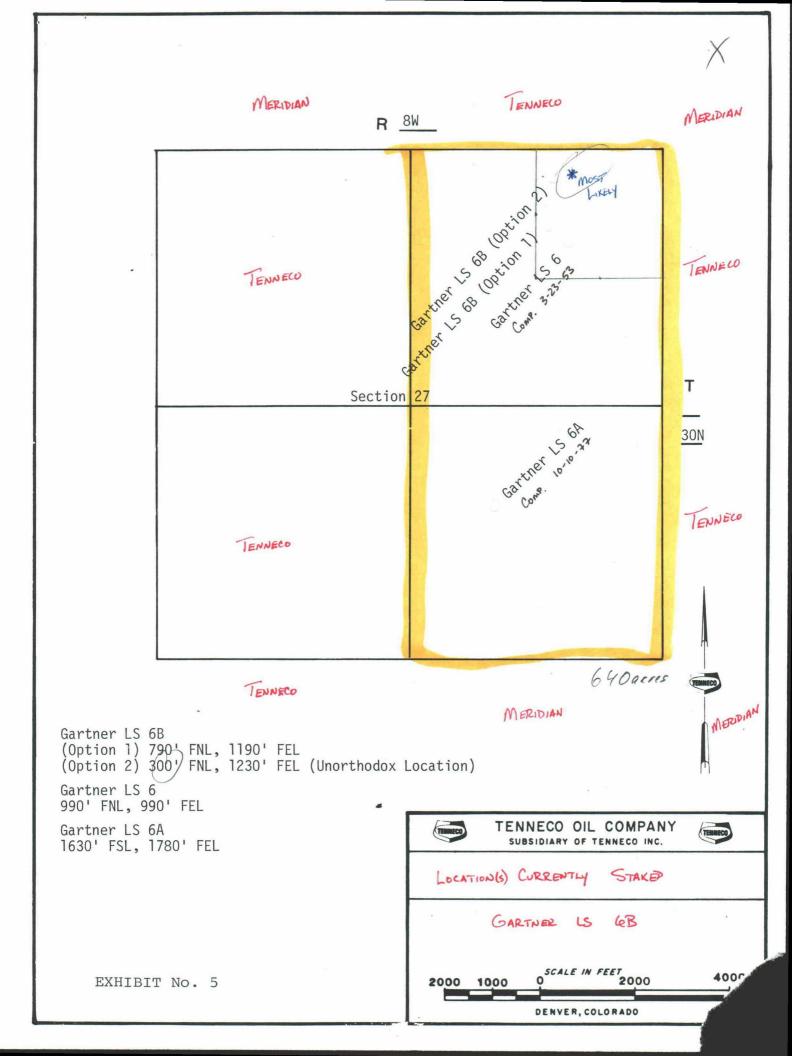
Santa Fe, NM 87501

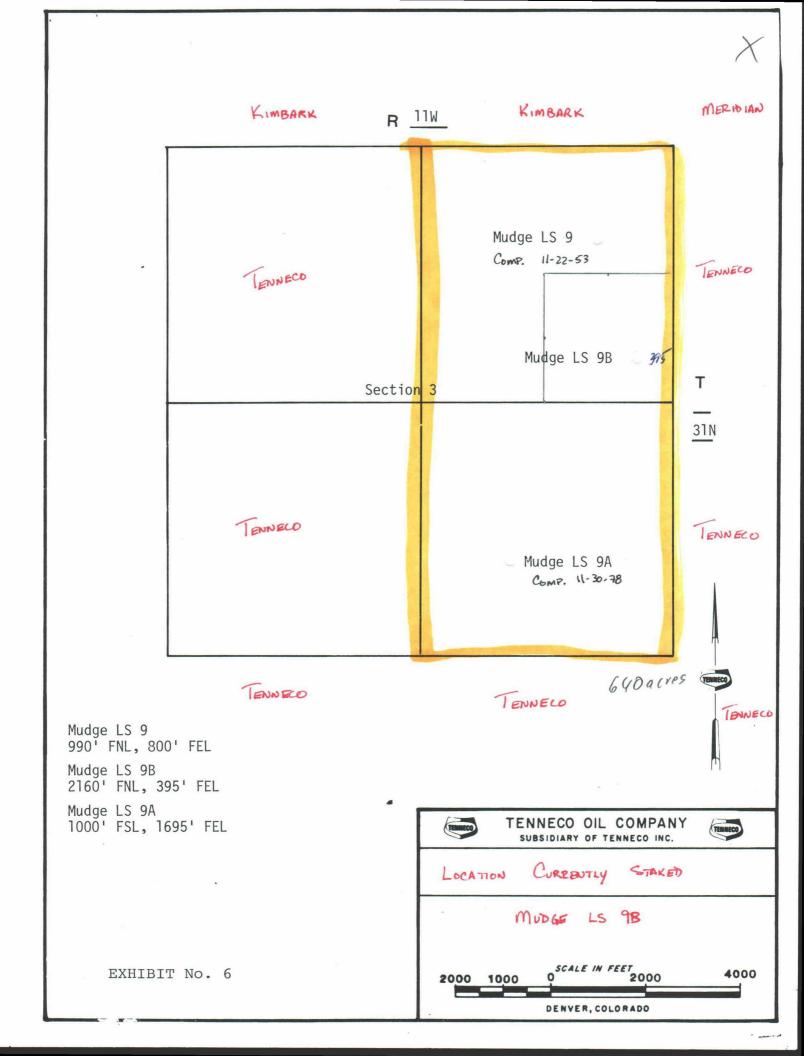


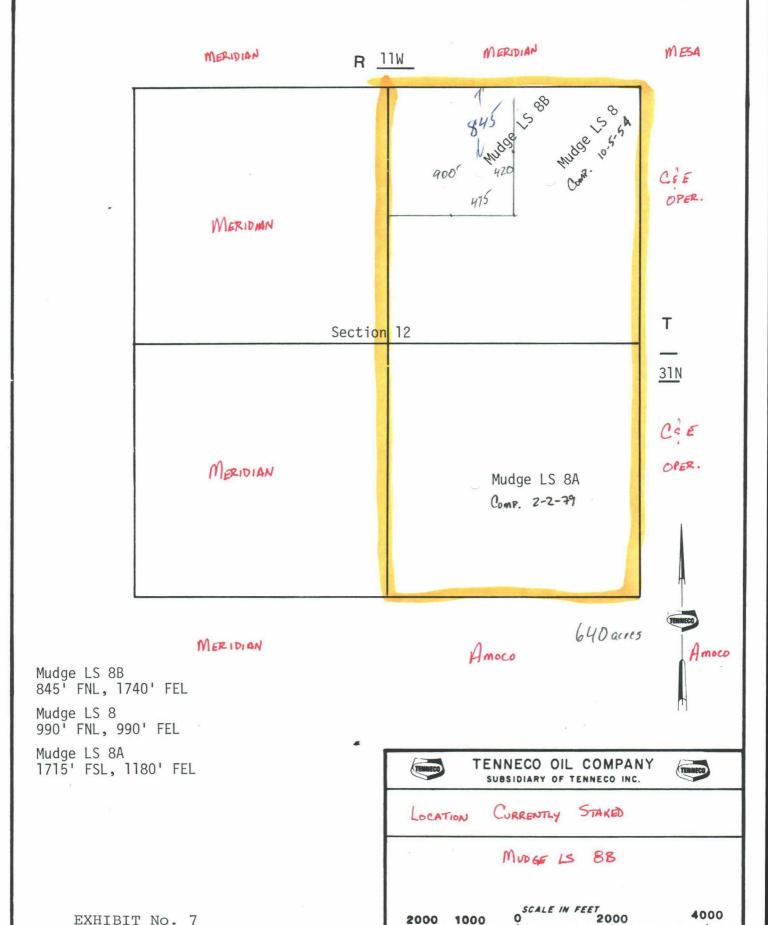








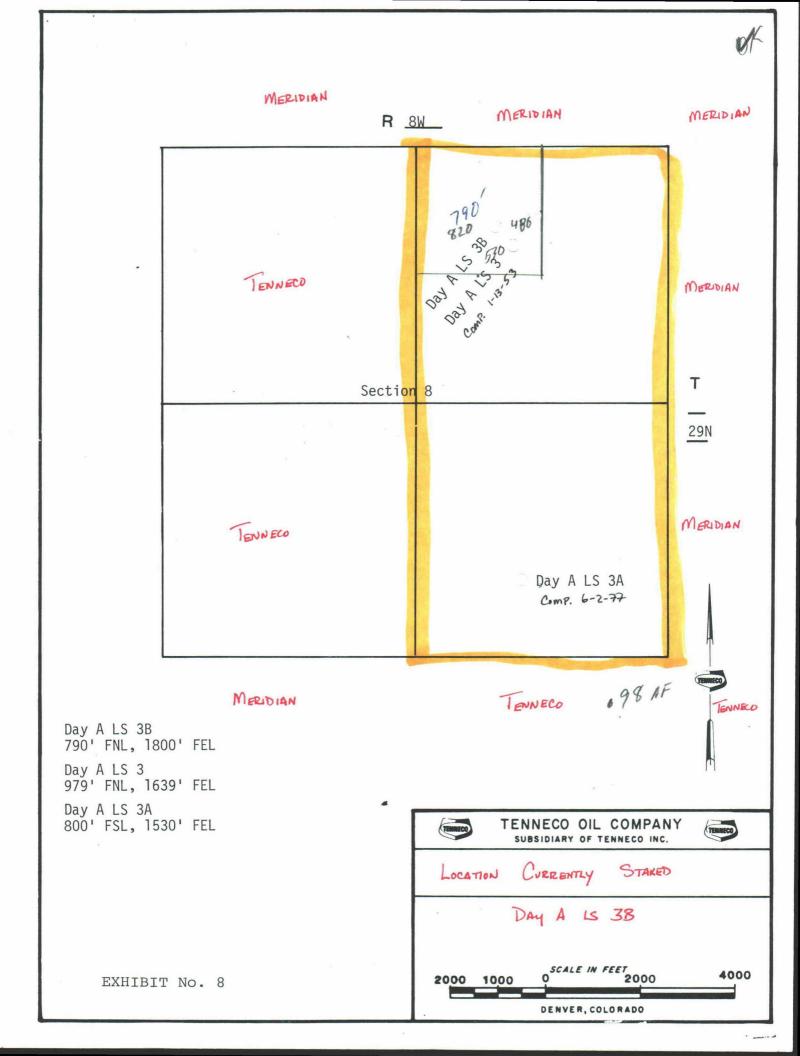




2000 1000

DENVER, COLORADO

EXHIBIT No. 7



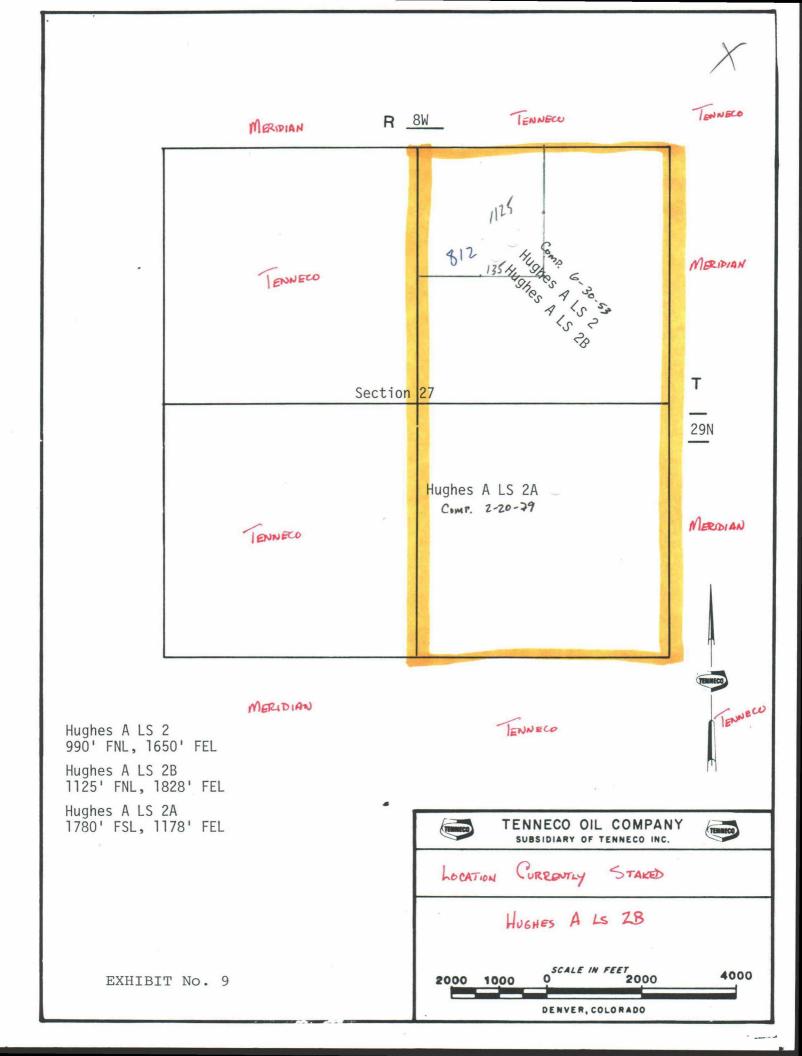
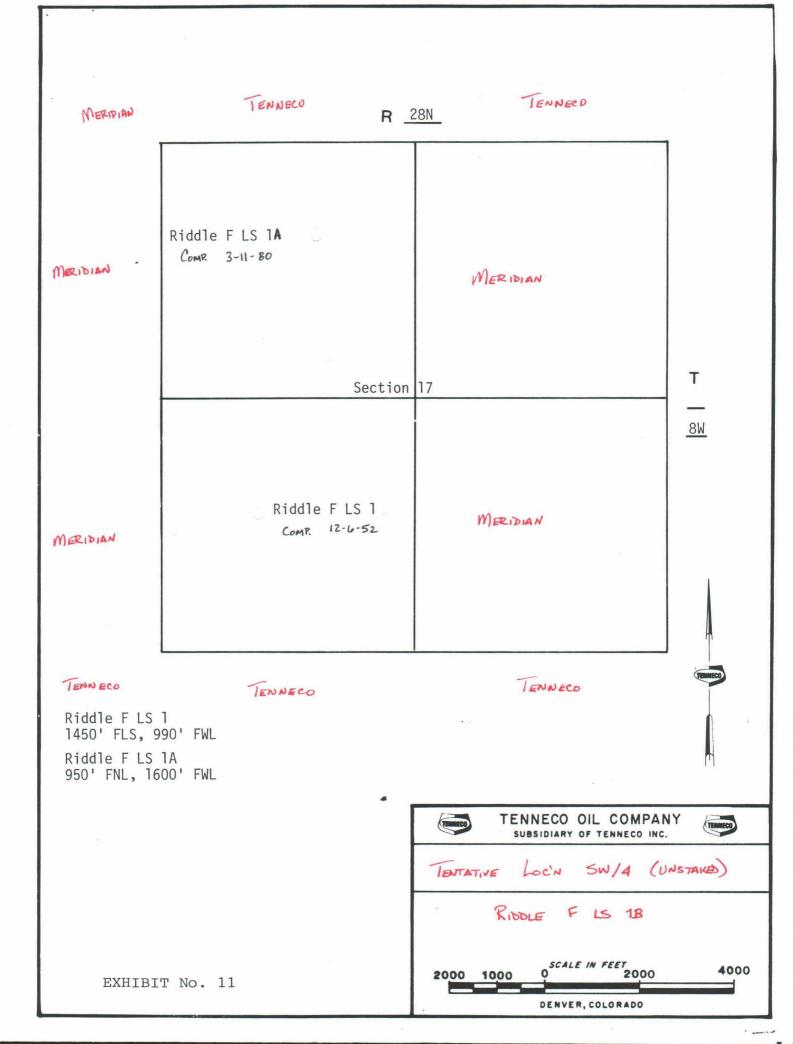
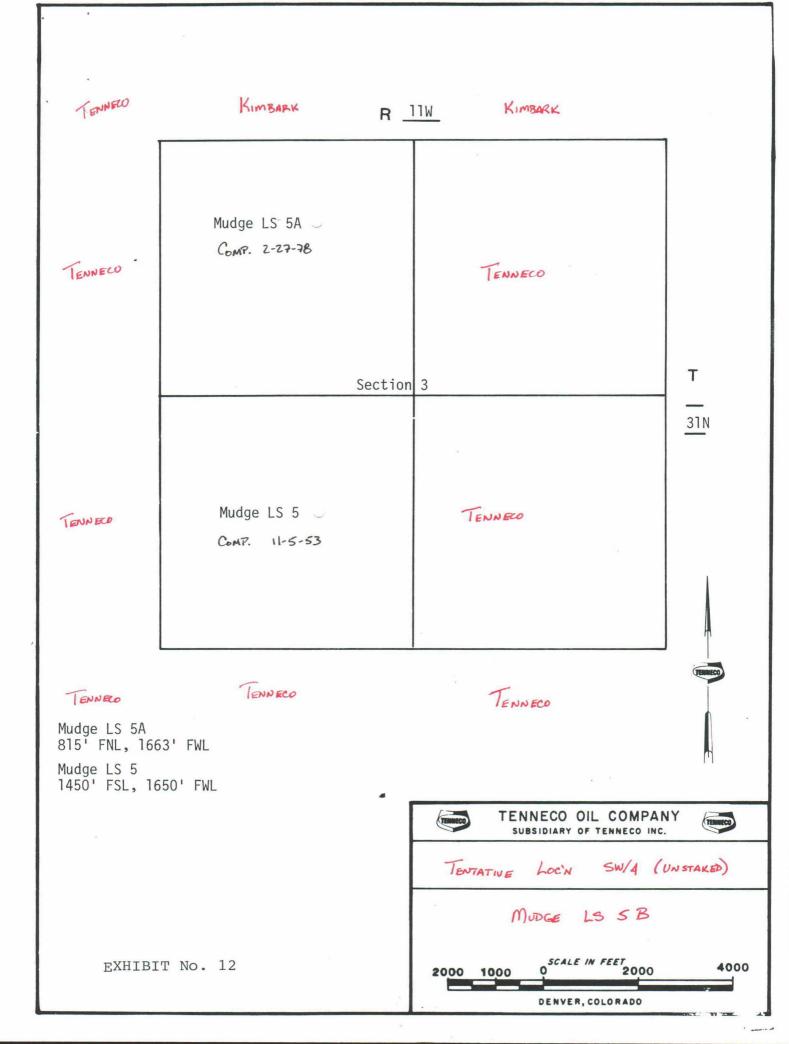


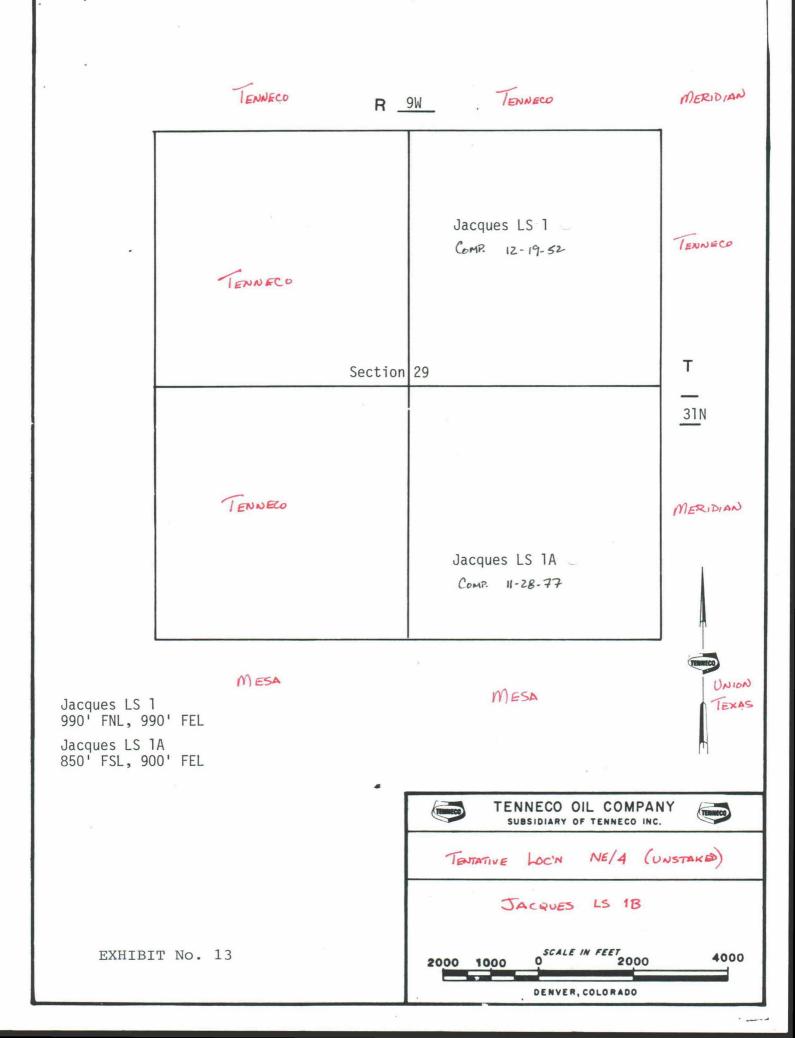
EXHIBIT No. 10

2000 1000 0 2000 4000

DENVER, COLORADO







Section 11

T

28N

A LS 2

3-11-55

Jones A LS 2A

TENNECO

Jones A LS 2

Jones A LS 2A

Comp. 8-11-80

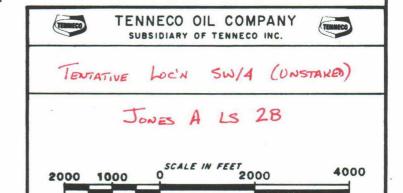
TENNELO

MERIDIAN

TENNECO

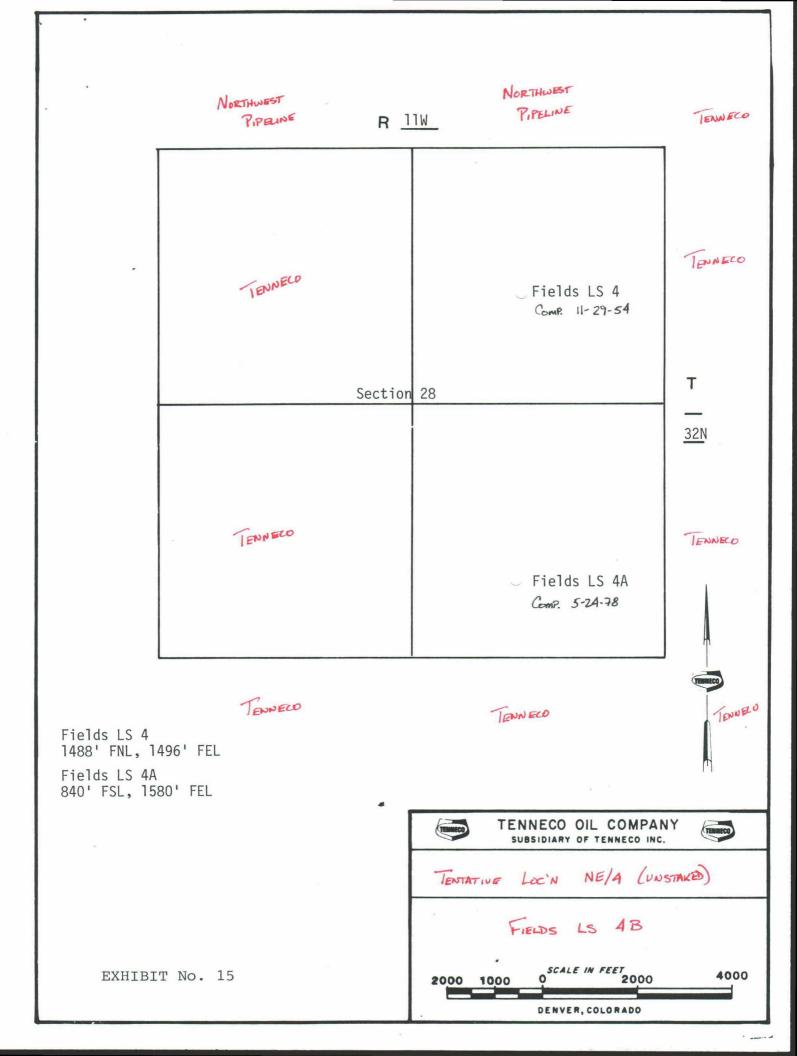
Jones A LS 2 1150' FSL, 890' FWL Jones A LS 2A 930' FSL, 1830' FEL TENNERO

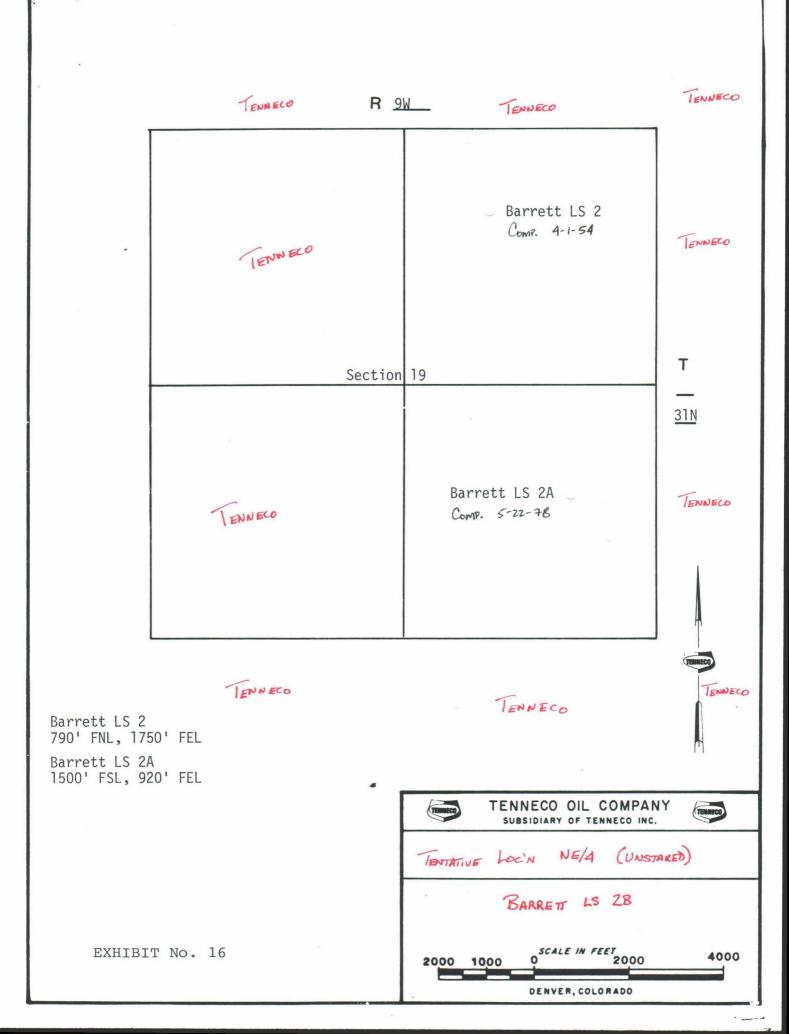




DENVER, COLORADO

EXHIBIT No. 14





CERTIFICATE OF MAILING

I hereby certify under oath that on the day of May, 1988, I caused to be mailed by Certified Mail a true and correct copy of the foregoing letter and application to the following:

Amoco Production Co. 1670 Broadway Denver, Colorado 80202

Mesa Limited Partnerhsip P. O. Box 2009 One Mesa Square Amarillo, TX 79189-2009

Kimbark Oil & Gas Co. 1580 Lincoln Street Suite 1000 Denver, CO 80203

C & E Operators Inc. Suite 1100 Two Energy Square Dallas, TX 75206

Meridian Oil Inc. P. O. Box 4289 3535 E. 30th St. Farmington, NM 87499

Northwest Pipeline Corp. 295 Chipeta Way Salt Lake City, UT 84108

Union Texas Petr. Corp. P. O. Box 2120 1330 Post Oak Blvd. Houston, TX 77252

Thomas

STATE OF NEW MEXICO

COUNTY OF SANTA FE

The foregoing instrument was acknowledged before me this 31d day of May, 1988, by W. Thomas Kellahin.

My Commission Expires:

9-26-91

KELLAHIN, KELLAHIN and AUBREY

Attorneys at Law

W. Thomas Kellahin Karen Aubrey

Jason Kellahin Of Counsel

El Patio - 117 North Guadalupe Post Office Box 2265

Santa Fé. New Mexico 87504-2265 May 31, 1988

Telephone 982-4285 Area Code 505

RECEIVED

MAY 3 : 1958

OIL CONSERVATION DIVISION

Mr. William J. LeMay Oil Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87504

"Hand Delivered"

Tenneco Oil Company for an Unorthodox Gas Well Location, Blanco Mesaverde Gas Pool San Juan County, New Mexico

Dear Mr. LeMay:

On behalf of Tenneco Oil Company, please set the enclosed application for hearing on the next available ${\cal O}$ examiner's docket now set for June 22, 1988.

suggest the following to be used for the advertisement for this case:

Application of Tenneco Oil Company for an unorthodox oil well location, San Juan County, New Mexico. Applicant in the above styled cause seeks approval for an unorthodox gas well location 965 feet from the North line and 2060 feet from the East line of Section 34, T32N, R11W, Blanco Mesaverde Gas Pool, with the N/2 of said section being dedicated to its Fields LS 7B Well, forming a standard 320-acre gas spacing and proration unit for said pool. Said location is approximately miles from

WTK:ca

David Motloch, Esq. Tenneco Oil Company P. O. Box 3249 Englewood, Colorado 80155

> Mr. Tim Hower Tenneco Oil Company P. O. Box 3249 Englewood, Colorado 80155

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

CEVEDO

HAY II .

IN THE MATTER OF THE APPLICATION OF TENNECO OIL COMPANY FOR APPROVAL OF AN UNORTHODOX OIL WELL LOCATION, SAN JUAN COUNTY, NEW MEXICO.

De Barrata a Distant

CASE:

APPLICATION

Comes now TENNECO OIL COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for approval of an unorthodox gas well location in the Blanco Mesaverde Gas Pool for its Fields LS 7B well, a gas well to be drilled at an unorthodox location 965 feet FNL and 2060 feet FEL of Section 34, T32N, R11W, San Juan County, New Mexico, to be dedicated to a 320-acre spacing and proration unit consisting of the N/2 of said section, and in support thereof would show:

- 1. Applicant has the right to drill and develop the N/2 of Section 34, T32N, R11W, NMPM, San Juan County, New Mexico.
- 2. Applicant proposes to drill its Fields LS 7B Well in the Blanco Mesaverde Gas Pool at an unorthodox gas well location 965 feet FNL and 2060 feet FEL of said Section 34 and to dedicate the N/2 of said section to the well as shown on Exhibit "A".

3. Rule 2(b) of the Special Rules for the subject pool provides that:

RULE 2(b). Well Location:

- 1. THE INITIAL WELL drilled on a GPU shall be located not closer than 790 feet to any outer boundary of the quarter section on which the well is located and not closer than 130 feet to any quarter-quarter section line or subdivision inner boundary.
- 2. THE INFILL WELL drilled on a GPU shall be located in the quarter section of the GPU not containing a Mesaverda Well, and shall be located with respect to the GPU boundaries as described in the preceding paragraph.
- 4. The subject well requires an exception to Rule 2(b) of the Special Rules of the pool in order to be at the optimum location to test the Blanco Mesaverde Gas Pool in the E/2 of said section.
- 5. Applicant requests that this matter be set for hearing on the Examiner's docket of June 22, 1988.
- 6. Notice to affected offset operators has not been sent because Tenneco Oil Company is the offset operator towards which the well encroaches.

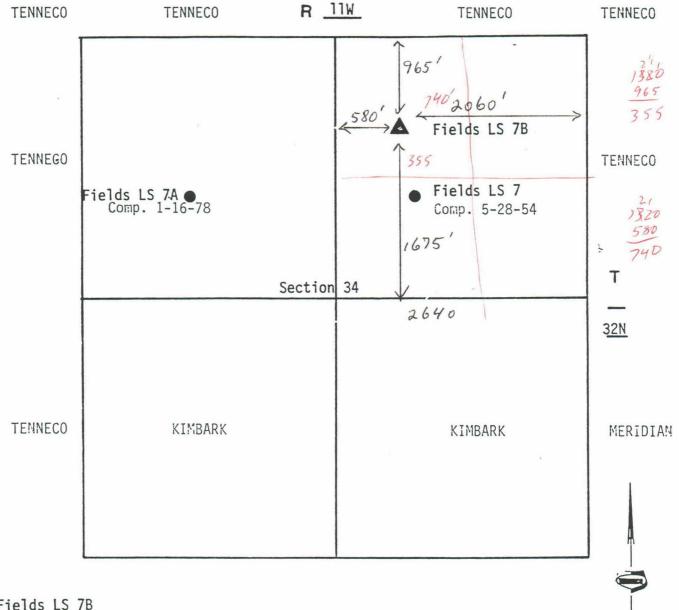
WHEREFORE, applicant seeks approval of the application as requested.

Kellahin, Kellahin & Aubrey

W. Thomas Kellahin, Esq.

P. O. Box 22**6**5

Santa Fe, New Mexico 87504



Fields LS 7B 965' FNL, 2060' FEL Fields LS 7 1610' FNL, 1830' FEL Fields LS 7A 1620' FNL, 1100' FWL

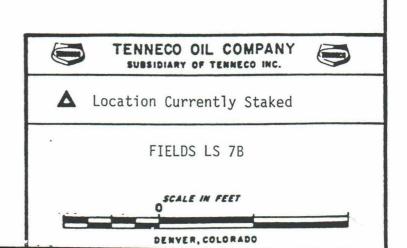


EXHIBIT A

CASE:

Application of Tenneco Oil Company for an unorthodox gas well location, San Juan County, New Mexico.

Applicant, in the above-styled cause seeks approval for an
unorthodox gas well location 965 feet from the North line and
2060 feet from the East line of Section 24, Township 32 North,
Range 11 West, Blanco Mesaverde Gas Pool, with the N/2 of said
section being dedicated to its Fields LS 7B Well, forming a
standard 320-acre gas spacing and proration unit for said pool.
Said location is approximately