#### 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

Telephone 982-4285 Area Code 505

July 12, 1988

RECEIVED

JUL 1 2 1988

OIL CONSERVATION DIVISION

Mr. William J. LeMay Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504 Case 9450

"Hand Delivered"

Re: Pennzoil Exploration & Production Company for an Unorthodox Subsurface Location and Approval to Intentionally Deviate Wellbore Lea County, New Mexico

Dear Mr. LeMay:

On behalf of Pennzoil Exploration & Production Company, please set the enclosed application for hearing at the next available examiner's docket now set for August 3, 1988.

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

Application of Pennzoil Exploration & Production Company for an unorthodox subsurface location and directional drilling, Lea County, New Mexico. Applicant in the above styled cause seeks approved to re-enter its State "2" - 1 Well at about 8500 feet and then commence drilling directionally to penetrate the top of the Strawn Formation in the Shipp Strawn Oil Pool at a true vertical depth of approximately 11,750 feet and within a 75 foot radius of an unorthodox subsurface location 1600 feet FSL and 330 feet FWL of Section 2, T17S, R37E, with the W/2SW/4 of said section being dedicated to its State "2" - 1 well, forming a standard 80-acre oil spacing and proration unit for said pool. Said location is approximately \_\_\_\_ miles \_\_\_\_ of \_\_\_\_\_\_ New Mexico.

#### KELLAHIN, KELLAHIN & AUBREY

JUL 1 2 1988

Mr. William J. LeMay July 12, 1988 Page 2

OIL CONSERVATION DIVISION

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 producures to hearing this application, they may call the Division or the undersigned.

Very truly yours,

. Thomas Kellahir

WTK:ca Enc.

cc: Lonnie L. Whitfield
 Pennzoil Exploration & Production Co.
 P. O. Box 2967

Houston, Texas 77252-2967

"Certified-Return Receipt Requested"

All parties listed in Exhibit "A"

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

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LIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF PENNZOIL EXPLORATION & PRODUCTION COMPANY FOR APPROVAL FOR DIRECTIONAL DRILLING AND APPROVAL OF AN UNORTHODOX SUBSURFACE LOCATION, LEA COUNTY, NEW MEXICO.

CASE NO. 9450

### $\underline{\mathbf{A}} \ \underline{\mathbf{P}} \ \underline{\mathbf{P}} \ \underline{\mathbf{L}} \ \underline{\mathbf{I}} \ \underline{\mathbf{C}} \ \underline{\mathbf{A}} \ \underline{\mathbf{T}} \ \underline{\mathbf{I}} \ \underline{\mathbf{O}} \ \underline{\mathbf{N}}$

Comes now PENNZOIL EXPLORATION & PRODUCTION COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for approval for directional drilling and an unorthodox subsurface location in the Shipp-Strawn Oil Pool, and in support thereof would show:

- Applicant is the operator of the State "2" 1 well, Section 2, T17S, R37E, NMPM, Lea County, New Mexico.
- 2. Applicant, with the consent of all working interest owners drilled the State "2" 1 well to a depth of 11,730 feet with a W/2SW/4 proration unit and at a surface location 660 feet from the West line and 1980 feet from the South line of said Section 2.
- 3. Applicant will plugg back its State "2" 1 well to about 8500 feet at which point applicant will commence

to directionally drill the subject well to penetrate the top of the Strawn Formation at a true vertical depth of approximately 11,330 feet to be within 75 foot radius of an unorthodox subsurface target which will be 330 feet from the West line and 1600 feet from the South line of said Section.

- 4. The applicant proposes that the proration and spacing unit for the subject well will remain in the W/2SW/4 of said Section 2.
- 5. Applicant's well will be an attempt to obtain production from the Shipp Strawn Pool but requires an expection to the pool rules which require wells to be located within 150 feet of the center of a quarter-quarter section.
- 6. In accordance with Division Rule 111, applicant seeks approval to directional drill the subject well based upon geologic and economic reasons.
- 7. Notice is being provided to all parties listed on Exhibit "A" attached hereto.
- 8. Applicant requests that this application be set for hearing on August 3, 1988.

WHEREFORE, applicant requests that after notice and hearing the application be approved as requested.

Respectfully submitted:

W. Thomas Kellahin

P. O. Box 2265

Santa Fe, New Mexico 87504

#### EXHIBIT "A"

## STATE "2" - 1 RE-ENTRY OFFSET OPERATORS W/2 SW/4 Section 2-17S-37E Lea County, New Mexico

TXO Production Corporation 900 Wilco Building Midland, TX 79701 ATTN: Carol Sledge

Chevron U.S.A. Inc. P. O. Box 1150 Midland, TX 79702 ATTN: Mickey Cohlmia

Charles B. Gillespie, Jr. P. O. Box Eight Midland, TX 79702

Terra Resources, Inc. 10 Desta Drive Suite 500 - West Midland, TX 79705 ATTN: Kevin Pfeister

Inexco Oil Company 2950 North Loop West Suite 1200 Houston, TX 77092-8862 ATTN: Ken Steer

Standard Oil Production 9401 Southwest Freeway Suite 1200 Houston, TX 77074 ATTN: Jim Sykes

Amerind Oil Company 500 Wilco Building Midland, TX 79701 ATTN: Robert C. Leibrock

Bill Seltzer 507 Petroleum Building Midland, TX 79701

Mesa Operating Limited Partnership P. O. Box 2009 Amarillo, TX 79189-2009 ATTN: Larry Hemmingway

Bechtel Energy Partners, Ltd. 5400 Westheimer Court, Ste. 570 Houston, TX 77056 ATTN: Karen Franklin

Texaco, Inc. P. O. Box 3109 Midland, TX 79702 ATTN: Curtis Smith