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January 31, 1991

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

RECEIVED

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OIL CONSERVATION DIVISION

M. S.

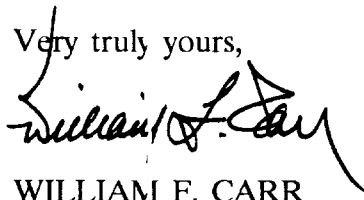
Re: Oil Conservation Division Case No. 10226
In the Matter of the Application of Bird Creek Resources for Special Pool
Rules for the East Loving-Delaware Pool, Eddy County, New Mexico

Dear Mr. LeMay:

Bird Creek Resources respectfully requests that this matter which is currently set on the Division docket for the February 7, 1991 hearings be continued to the February 21, 1991 Examiner docket.

Your attention to this matter is appreciated.

Very truly yours,



WILLIAM F. CARR

WFC:mlh

cc: Mr. Brad Burks
W. Thomas Kellahin, Esq.
Jim. Bruce, Esq.



Pogo Producing Company

2919 Allen Parkway • Post Office Box 2504 • Houston, Texas 77252-2504 • 713-630-4747

HARVEY L. GOLD
Vice President
Engineering

February 20, 1991

New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Re: **Case No. 10226**
Applicant Bird Creek Resources
Special Pool Rule
East Loving - Delaware Pool
Township 23 South, Range 28 East
Lea County, New Mexico

Gentlemen:

This letter is in reference to the Bird Creek Resources application for Special Pool Rules for the East Loving, Delaware Pool, Lea County, New Mexico. In regard to Bird Creek Resources request for a gas-oil ratio of 5000 cubic feet per barrel of oil, Pogo Producing Company suggests a gas-oil ratio of 3500 cubic feet per barrel of oil.

Pogo Producing Company has not had time to prepare for a hearing after receipt of relevant field production and reservoir data, but would like to submit our position in writing. We believe that a significant gas-oil ratio increase above 2000 at this time may result in premature reservoir pressure depletion. The premature depletion of this gas drive aspect of the reservoir could result in trapped reservoir oil, which would otherwise be recovered. Pogo Producing Company therefore believes that at this early stage of reservoir depletion a gas-oil ratio above 3500 cubic feet per barrel of oil could result in a waste of natural resources. This position should be subject to review based on reservoir performance in 6 to 12 months.

Yours very truly,

Harvey L. Gold
Harvey L. Gold

HLG/DB/jb

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

POST OFFICE BOX 2088
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SANTA FE, NEW MEXICO 87504
(505) 827-5800

May 10, 1991

CAMBELL & BLACK
Attorneys at Law
P. O. Box 2208
Santa Fe, New Mexico 87504

RE: CASE NO. 10226
ORDER NO. R-9501

Dear Sir:

Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.

Sincerely

Florence Davidson

Florence Davidson
OC Staff Specialist

FD/sl

cc: BLM Carlsbad Office
T. Kellahin
P. Pearce
J. Bruce