KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

W. THOMAS KELLAHIN* KAREN AUBREYT

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*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

TALSO ADMITTED IN ARIZONA

JASON KELLAHIN (RETIRED 1991)

March 2, 1992

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Mr. William J. LeMay Oil Conservation Division 310 Old Santa Fe Trail State Land Office Building Santa Fe, New Mexico 87501 OIL CONSERVATION DIVISION

Jase 10455

HAND DELIVERED

First Amended Application of Southland RE:

Royalty Company for

Approval of an Unorthodox Well

Location, and Downhole

Commingling, San Juan County,

New Mexico

Dear Mr. Lemay:

On behalf of Southland Royalty Company, please find enclosed our application for a hearing for the Aztec #700 Well. We request that this case be set for hearing on March 19, 1992.

Thomas Kellahin

Very truly yours

WTK/ch

Enclosure

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF SOUTHLAND ROYALTY COMPANY FOR APPROVAL OF AN UNORTHODOX GAS WELL LOCATION, APPROVAL OF A NON-STANDARD SPACING AND PRORATION UNIT AND DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO

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OIL CONSERVATION DIVISION

Case 10455

FIRST AMENDED APPLICATION

Comes now SOUTHLAND ROYALTY COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for approval to drill its proposed Southland Royalty Company's Aztec #700 Well as follows:

- (1) at an unorthodox well location 2280 feet FSL and 1500 feet FWL of Section 14, T28N, R11W, NMPM, San Juan County, New Mexico;
- (2) to downhole commingle production from the Fulcher-Kutz Pictured Cliffs Gas Pool and the Basin Fruitland Coal Gas Pool, said well being located in the NW/4SW/4 of said Section 14;
- (3) with the dedication of a standard spacing unit containing 320 acres and consisting of the S/2 of said Section 14 for production from the Basin Fruitland Coal Gas Pool; and

(4) the dedication of a previously approved non-standard proration and spacing unit containing 160 acres and consisting of the W/2 NW/4 and N/2 SW/4 of said Section 14 for production from the Fulcher-Kutz Pictured Cliff Pool.

and in support thereof states:

- 1. Southland Royalty Company ("Southland") is the proposed operator of the subject well and is a working interest owner in both proposed spacing units in the Basin Fruitland Coal Gas Pool and the Fulcher-Kutz Pictured Cliff Pool.
- 2. Southland proposed the subject well at a standard location in Unit M at 810 feet FSL and 790 feet FWL but its request was denied by the Bureau of Land Management because of visual impairment.
- 3. In compliance with Bureau of Land Management requirements, Southland now proposes the subject well be drilled at an unorthodox location 1500 feet FWL and 2280 feet FSL to a depth sufficient to test both the Fulcher-Kutz Pictured Cliffs Gas Pool and the Basin Fruitland Coal Gas Pool.
- 4. The proposed unorthodox location is an acceptable location within the section from which to test for production in both the Pictured Cliffs Pool and the Basis Fruitland Coal Gas Pool.

- 5. The subject non-standard proration and spacing unit for the Fulcher-Kutz Pictured Cliffs production was previously approved by Division Administrative Order NWU-80 dated May 20, 1955 and is currently dedicated to the Aztec Well No. 3 in Unit E of said Section which will be plugged and abandoned and replaced by the Aztec #700 well.
- 6. In accordance with Division Rule 303-C-1.(b), Southland states and will demonstrate at hearing:
- (a) that the commingling is necessary to permit the Pictured Cliffs Pool to be produced because it is not otherwise economic to attempt to drill a separate well for each of the two pools involved;
- (b) that there will be no crossflow between the two commingled pools;
- (c) that neither commingled zone exposes the other commingled zone to damage by produced liquids;
- (d) that the fluids, if any, from each zone ar expected to be compatible with the other zone;
- (e) that ownership is common between the two pools and no other correlative rights violations will occur;
- (f) that the bottomhole pressure of the lower pressure zone is not anticipated to be less that 50 percent of the bottom hole pressure of the higher pressure zone when adjusted to a common datum;

- (g) that the value of the commingled production is not less that the sum of the values of the individual production.
- 7. Southland seeks the approval of an allocation formula for the equitable distribution of production between the two pools based upon individual pool production tests to be conducted on the well during its drilling and completion.
- 8. The ownership between the two pools is identical.
- 9. Southland requests that this matter be docketed for hearing on the Division Examiner docket now scheduled for March 19, 1992.
- 10. A copy of this application has been sent to all offsetting operators and to the owners of interest in the affected production within the two spacing units as set forth on Exhibits A and B.

WHEREFORE, Southland requests that this matter be set for hearing on March 19, 1992 before a duly appointed Examiner of the Oil Conservation Division and that after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted,

W. Thomas Kellahin

Kellahin, Kel/lahin & Aubrey

P.O. Box 2265

Santa Fe, New Mexico 87504-2265

(505) 982-4285

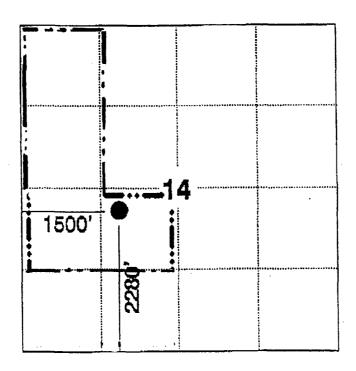
Attorneys for Applicant

AZTEC #700 OFFSET OPERATOR PLAT

Pictured Cilffs \Fruitiand Coal Co-Mingle and Unothodox Location

Fruitland Coal Ownership

Township 28 North, Range 11 West San Juan County, New Mexico

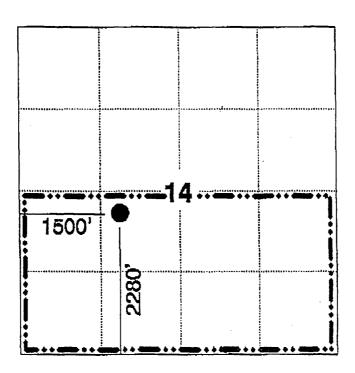


Marathon Oil Company		PO Box 552, Midland, TX 79702
<u>Viesa Limited Par</u>		PO Box 2009, Amarillo, TX 79189
Patrocorp Inc.	16600 Greensport Park Di	r, Ste 300 N Atrium, Houston, TX 77080
W M Galloway	3005 Northri	dge Dr., Suite I. Farmington, NM 87401

AZTEC #700 OFFSET OPERATOR PLAT

Pictured Cilffs \Fruitland Coal Co-Mingle Fruitland Coal Ownership

Township 28 North, Range 11 West San Juan County, New Mexico



PO Box 552, Midland, TX 79702
1535 Highway 84, Bloomfield, NM 87413
PO Box 2009, Amarillo, TX 79169
821 17th St, Suite 1301, Denver, CO 80293
ark Dr, Ste 300 N Atrium, Houston, TX 77060
orthridge Dr., Suite I, Farmington, NM 87401

EXHIBIT "B"

OWNERS OF PRODUCTION AZTEC # 700 WELL

RONALD S. DAVIS M.D. 1100 E. LAKE SUITE 140 TYLER, TX. 75701

MINERALS MANAGEMENT SERVICE ROYALTY MANAGEMENT PROGRAM P.O. BOX 5810 DENVER, CO. 80217

SOUTHLAND ROYALTY COMPANY P.O. BOX 4289 FARMINGTON, NM. 87499-4289