KELLAHIN and KELLAHIN

Attorneys at Law

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Jason Kellahin W. Thomas Kellahin Karen Aubrey El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265 Telephone 982-4285 Area Code 505

RECEIVED

June 19, 1984

JUN 19 1984

OIL CONSERVATION DIVISION

Cuse 8243

Mr. Joe D. Ramey
Oil COnservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

"Hand Delivered"

Re: Robert E. Chandler Corp.
Compulsory Pooling Application
T20S, R38E, NMPM
Sec 12: NW/4NW/4

Sec 12: NW/4NW/4 Lea County, New Mexico

Dear Mr. Ramey:

Please find enclosed a compulsory pooling application on behalf of Robert E. Chandler which we would appreciate being set for the July 11, 1984, Examiner Hearing Docket.

W. Thomas Kellahir

WTK:ca Enc.

cc: Robert E. Chandler 2005 Neely Midland, Texas 79705

> Brian K. Murphy 403 Petroleum Building Midland, Texas 79701

KELLAHIN and KELLAHIN

Mr. Joe D. Ramey June 19, 1984 Page 2

cc: (With Enclosure)
 Kenneth R. Cronin
 Trust Real Estate Officer
 Bank of California
 P. O. Box 45,000
 San Francisco, California 94145

Betty M. Dreessen 27447 Edgerton Road Los Alton Hills, Ca 94072

Priscilla A. Kyte 27447 Edgerton Road Los Altos Hills, CA 94072

Edward Dreessen, Jr. 27447 Edgerton Road Los Altos Hills, CA 94072

David B. Kyte 27447 Edgerton Road Los Altos Hills, CA 94072

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

RECEIVED

IN THE MATTER OF THE APPLICATION OF ROBERT E. CHANDLER CORPORATION, FOR COMPUSLORY POOLING LEA COUNTY, NEW MEXICO.

JUN 1 9 1984

OIL CONSERVATION DIVISION CASE: 8-243

APPLICATION

Comes now Robert E. Chandler Corporation and applies to the Oil Conservation division of New Mexico for an order pooling all mineral interests from the surface to base of Drinkard, underlying the NW/4NW/4 of Section 12, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico, for the formation of a proration and spacing unit for the said production, and in support thereof would show the Commission:

- 1. Applicant is an owner of the right to drill and develop the NW/4NW/4 of Section 12, Township 20 South, Range 38 East, NMPM.
- 2. Applicant proposes to drill a well at a standard location and to dedicate the NW/4NW/4 of said Section to the well.
- 3. Applicant has sought to obtain the cooperation of all parties.
- 4. In order to obtain their just and equitable share of the production underlying the above lands, Applicant needs an order pooling the mineral interest involved.

5. Those who have not consented to join in the drilling of the well, with their addresses, to the best of applicant's information and belief, are as follows:

NAME

ONE-FOURTH INTEREST

Kenneth R. Cronin Trust Real Estate Officer Bank of California P. O. Box 45,000 San Francisco, California 94145 For the Betty Kyte Dreessen Trust #12120108 and \$121201035

Betty M. Dreessen 27447 Edgerton Road Los Altos Hills, CA 94072

Priscilla A. Kyte 27447 Edgerton Road Los Altos Hills, CA 94072

Edward Dreessen, Jr. 27447 Edgerton Road Los Altos Hills, CA 94072

David B. Kyte 27447 Edgerton Road Los Altos Hills, CA 94072

6. The parties named in paragraph 5 above have been furnished a copy of this application.

WHEREFORE applicant prays that this application be set for hearing before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described herein. Applicant further prays that it be named operator of the well, and that the order make provision for applicant to recover out of production its costs of drilling the subject well, completing and

equipping it, costs of operation, including costs of supervision and a risk factor in the amount of 200% for the drilling of the well, and for such other and further relief as may be proper.

Respectfully submitted,

W. Thomas Kellahin KELLAHIN & KELLAHIN

P. O. Box 2265

Santa Fe, New Mexico 87501

(505) 982-4285

Attorneys for Applicant