Jason Kellahin W. Thomas Kellahin Karen Aubrey James B. Grant

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

Telephone 982-4285 Area Code 505

October 24, 1984

OIL CONSERVATION DIVISION

HAND-DELIVERED

Mr. Richard Stamets Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87501 Cuse 8420

In the Matter of the Application of BTA Oil Producers for Compulsory Pooling, Lea County, New Mexico

Dear Mr. Stamets:

Enclosed please find an application for Compulsory Pooling filed on behalf of BTA Oil Producers. Please set this matter for hearing on November 28, 1984.

Very truly yours,

Kullen de Nice;

Karen Aubrey

KA:mh

Enc.

Robin Hughes cc: BTA Oil Producers 104 S. Pecos Midland, Texas 79701

Union Oil Company of California

Post Office Box 671 Midland, Texas 79701 Attn: Robert Lockhart

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

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OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF BTA OIL PRODUCERS, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 8420

APPLICATION

COME NOW, BTA OIL PRODUCERS, and apply to the New Mexico Oil Conservation Division of New Mexico for an Order pooling all mineral interests from the surface to the base of the Morrow, underlying the SW/4 of Section 24, Township 20 South, Range 34 East, 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 the owner of the right to drill and develop the SW/4 of Section 24, Township 20 South, Range 34 East, Lea County, New Mexico.
- 2. Applicant proposes to drill the 8212 JV P Lynch #2 Well, at a location 1980 feet from the South and West lines and to dedicate the SW/2 of said Section to said 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:
 - 1. Union Oil Company of California
 Post Office Box 671
 Midland, Texas 79701
 Attn: Robert Lockhart
 Percent of interest is 50%

The foregoing interest total is 50%

6. The party named in paragraph 5 above has 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, for such other and further relief as may be proper.

Respectfully submitted,

BTA Oil Producers

Karen Aubrey

KELLAHIN & KELLAHIN Post Office Box 2265

Santa Fe, New Mexico 87501

Attorneys for Applicant

cc: Robin Hughes
BTA Oil Producers
104 S. Pecos
Midland, Texas 79701

Union Oil Company of California Post Office Box 671 Midland, Texas 79701 Attn: Robert Lockhart Jason Kellahin
W. Thomas Kellahin
Karen Aubrey
Janes B. Grant

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

Telephone 982-4285 Area Code 505

October 29, 1984

RECEIVED

OCT 29 1984

HAND-DELIVERED

OIL CONSERVATION DIVISION

Mr. Richard Stamets Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87501

Case 8420

Re: In the Matter of the Application of BTA Oil Producers for Compulsory Pooling, Lea County, New Mexico

Dear Mr. Stamets:

Enclosed please find an amended application for Compulsory Pooling filed on behalf of BTA Oil Producers. Please set this matter for hearing on November 28, 1984.

Very truly yours,

Van Ca

KA:mh

Enc.

cc: Robin Hughes
BTA Oil Producers
104 S. Pecos
Midland, Texas 79701

Union Oil Company of California Post Office Box 671 Midland, Texas 79701 Attn: Robert Lockhart

OIL CONSERVATION DIVISION

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

IN THE MATTER OF THE APPLICATION OF BTA OIL PRODUCERS, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

case no. 8420

A P A M E N D E D O N

COME NOW, BTA OIL PRODUCERS, and apply to the New Mexico Oil Conservation Division of New Mexico for an Order pooling all mineral interests from the surface to the base of the Morrow, underlying the SW/4 of Section 24, Township 20 South, Range 34 East, 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 the owner of the right to drill and develop the SW/4 of Section 24, Township 20 South, Range 34 East, Lea County, New Mexico.
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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, for such other and further relief as may be proper.

Respectfully submitted,

BTA Oil Producers

By: Karen Aubrey

KELLAHIN & KELLAHIN

Post Office Box 2265

Santa Fe, New Mexico 87501

Attorneys for Applicant

cc: Robin Hughes
BTA Oil Producers
104 S. Pecos
Midland, Texas 79701

Union Oil Company of California Post Office Box 671 Midland, Texas 79701 Attn: Robert Lockhart