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

RECEIVED

MAY 25 1855

IN THE MATTER OF THE APPLICATION
OF LYNX PETROLEUM CONSULTANTS,
INC., FOR APPROVAL OF AN
UNORTHODOX WELL LOCATION,
COMPULSORY POOLING AND DUAL
LOCATION, LEA COUNTY, New Mexico

OIL CONSERVATION DIVISION

Case: <u>\$631</u>

APPLICATION

COMES NOW, LYNX PETROLEUM CONSULTANTS, INC., by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division for approval of the following:

- 1. An unorthodox gas well location 2,100 feet from the West line and 1,650 feet from the South line of Section 25, Tl6S, R36E, NMPM, Queen Formation, Lea County, New Mexico, and in support thereof would show:
- a. Applicant has the right to drill and develop the SW/4 of Section 25, T16S, R36E, Lea County, New Mexico.
- b. Applicant proposes to recomplete Geraldine Doughty No. 1 Well which presently produces from the Paddock formation, as a dual Paddock-Queen producer.

- c. Applicant proposes to dedicate the SW/4 of said Section 25 to the well.
- d. Applicant proposes to attempt a completion in the Queen Formation.
- e. Offsetting operators have been provided with a copy of this application.
- 2. Applicant has sought to obtain the cooperation of all parties.
- a. In order to obtain its just and equitable share of the production underlying the above lands, Applicant needs an order pooling the mineral interest involved.
- b. Those who have not consented to join in the recompletion of the well in the Queen, with their addresses, to the best of Applicant's information and belief, are as follows:

Name and Address % Interest in the 160 Acres

- 1. Anderson Carter 2.9296875 209 South Fifth Street Lovington, New Mexico 88260
- 2. Powhatan Carter, Jr. 2.9296875
 & Beverly T. Carter,
 Trustees
 824 Main Street
 Ft. Sumner, New Mexico 88119
- 3. Kenneth G. Cone 0.1171875
 Post Office Box 11310
 Midland, Texas 79702

4. Cathie Cone Auvenshine 9210 Honeycomb Drive Austin, Texas 78737 0.1171875

5. Texaco, Inc.
Post Office Box 3109
Midland, Texas 79702
ATTN: John Clark

50%

The foregoing interests total 56.09375 working interest.

- c. The parties named in paragraph 2(b) above have been furnished a copy of this application.
- 3. In the event that Applicant obtains commercial production from the Queen, Applicant seeks permission to dually complete this well with production from the Paddock.

WHEREFORE, Applicant prays that this application before the for hearing be set Division's appointed examiner, and that after notice and hearing as required by law, the Division enter its order approving the unorthodox location, pooling the mineral interest described herein, and approving the dual completion. 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 and completion of the subject well in the Queen, equipping it, costs of operation, including costs of supervision and 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:

Kellahin & Kellahin

Karen Aubrey

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(505) 982-4285

cc: Anderson Carter

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Mr. Gary Fonay Lynx Petroleum Consultants, Inc. Post Office Box 1666 Hobbs, New Mexico 88240