

BEFORE THE
OIL CONSERVATION COMMISSION
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

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IN THE MATTER OF THE APPLICATION
OF BENSON-MONTIN-GREER DRILLING
CORP. FOR COMPULSORY POOLING
AND AN UNORTHODOX WELL LOCATION,
RIO ARriba COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE 9019

APPLICATION

COMES NOW, BENSON-MONTIN-GREER DRILLING CORP., by and through its undersigned attorneys and, as provided by Section 70-2-17, N.M.S.A. 1978, hereby makes application for an order pooling all of the mineral interests in the Niobrara member of the Mancos formation, in and under the 640-acre spacing or proration unit comprised of Section 19, Township 25 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico, and in support thereof would show the Commission:

1. Applicant owns or represents approximately 91% of the working interest in and under the 640-acre spacing or proration unit comprised of said Section 19, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced

640-acre standard spacing or proration unit to a well to be drilled at an unorthodox location 1,340 feet from the North line and 1,903 feet from the West line of said Section 19.

3. Applicant represents all of the working interest owners in said Section 19, except for Mountain States Natural Gas Corporation, Albert J. Blair, President, Post Office Box 35426, Tulsa, Oklahoma 74135, owner of a 9.4% working interest.

4. Said pooling of interests and well completion will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well to be drilled.

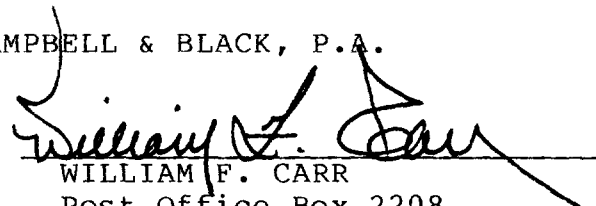
WHEREFORE, Applicant prays that this application be set for hearing before the Oil Conservation Commission on October 23, 1986, and that after notice and hearing as required by law, the Commission enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling,

completing and equipping the well, approving the location of the well as proposed by Applicant, and making such other and further provisions as may be proper in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By

A handwritten signature in dark ink, appearing to read "William F. Carr", is written over a horizontal line.

WILLIAM F. CARR

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ATTORNEYS FOR BENSON-MONTIN-GREER
DRILLING CORP.