W. Thomas Kellahin Karen Aubrey

Jason Kellahin Of Counsel KELLAHIN, KELLAHIN AND AUBREY Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

RECEIVED

June 22, 1987

JUN 2 3 1987

GIL CONSERVATION DIVISION

Mr. William L. LeMay Oil Conservation Divsion P. O. Box 2088 Santa Fe, New Mexico 87504

"Hand Delivered"

Re: Application of Phillips Petroleum Company for Special Capacity Allowable Cuse 9/76 Lea County, New Mexico

Dear Mr. LeMay:

Please set the enclosed application for hearing on the next available docket now scheduled for July 15, 1987.

Very truly yours, Thomas ellahin

WTK:ca Enc.

cc: G. R. Smith Phillips Petroleum Company 4001 Penbrook Odessa, Texas 79762

> William Mueller Phillips Petroleum Company 4001 Penbrook Odessa, Texas 79762

All Parties on Exhibit "A" to Application

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

IN THE MATTER OF THE APPLICATION OF PHILLIPS PETROLEUM COMPANY FOR SPECIAL CAPACITY ALLOWABLE, LEA COUNTY, NEW MEXICO.

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CASE: 9/76 OIL CONSERVATION DIVISION

## APPLICATION

COMES NOW PHILLIPS PETROLEUM COMPANY, by and through its attorneys, Kellahin, Kellahin & Aubrey and applies to the New Mexico Oil Conservation Division for approval of a special capacity allowable for production from its Philmex Lease Well No. 19, located in Unit H, Section 35, T17S, R33E, Vacuum-Grayburg/San Andres Pool.

Applicant further seeks the approval of a similar special capacity allowable for proration from wells to be drilled at the following locations:

(1) Unit B of Section 35, T17S, R33E, NMPM;

(2) Unit G of Section 35, T17S, R33E, NMPM, and;

(3) Unit D of Section 36, T17S, R33E, NMPM, all in Lea County, New Mexico and in support thereof would show:

 Applicant is the operator of the subject well and the proposed operator for the three additional wells to be drilled.

 Offsetting operators to whom notice has been provided pursuant to Division rules are as shown on Exhibit "A". 3. The Philmex Lease Well No. 19 has encountered substantial high pressure production response to water injection and in order to avoid waste the allowable for said well must be increased and the oil produced before it migrates beyond the wellbore.

4. The current depth bracket allowable of 80 barrels of oil per day is insufficient to allow the applicant to produce the oil before the oil is swept beyond the wellbore as a result of waterflood operations.

5. Applicant requests that the subject wells be authorized to produce an allowable equal to their respective capacities to produce what applicant believes will be in the range of 350 barrels of oil per day.

WHEREFORE, applicant requests that the subject application be set for hearing and that after notice and hearing the application be granted.

Respectfully submitted: By. W. Thomas Kellahin

W. Thomas Kellanin P. O. Box 2265 Santa Fe, NM 87504

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Exhibit "A"

Arco Oil and Gas Company P. O. Box 1610 Midland, Texas 79701 Chevron, U.S.A. Inc. P. O. Box 1150 Midland, Texas 79702 Harvey E. Yates Company Box 1933 Roswell, New Mexico 88201 Union Oil Company of California Box 671 Midland, Texas 79702 Pennzoil Company P. O. Drawer 1828 Midland, Texas 79702-1828 STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF PHILLIPS PETROLEUM COMPANY FOR SPECIAL CAPACITY ALLOWABLE, LEA COUNTY, NEW MEXICO.

CASE: 9176

## CERTIFICATE OF MAILING AND COMPLIANCE WITH ORDER R-8054

In accordance with Division Rule 1207 (Order R-8054) I hereby certify that on June 23, 1987, notice of the hearing, and a copy of this application, were mailed at least twenty days prior to hearing originally set for July 15, 1987 to the operators and interested parties listed in Exhibit "A" attached to application.

Thomas Kellahin

SUBSCRIBED AND SWORN to before me this 25 day of

June, 1987.

Enular 1 aurel Notary Public

My Commission Expires:

1-26-87