# CAMPBELL & BLACK, P.A.

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
J. SCOTT HALL
PETER N. IVES
JOHN H. BEMIS
MARTE D. LIGHTSTONE

GUADALUPE PLACE
SUITE I - 110 NORTH GUADALUPE
POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208

TELEPHONE: (505) 988-4421

TELECOPIER: (505) 983-6043

August 18, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Petco Limited and PC Ltd. Post Office Box 911 Breckenridge, Texas 76024

Attn: Ms Frankie Jenkins

Re: Application of Amerind Oil Company for Compulsory Pooling, Lea County, New Mexico

Dear Sirs:

This letter is to advise you that Amerind Oil Company has filed an application with the New Mexico Oil Conservation Division seeking the force pooling of all mineral interests in the Atoka and Strawn formations, in and under the W/2 SW/4 of Section 27, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico. Amerind Oil Company proposes to dedicate the referenced pooled unit to a well to be located at a standard location in the NW/4 SW/4 of said Section 27.

This application has been set for hearing before a Division Examiner on September 9, 1987. You are not required to attend this hearing, but as an owner that has an interest which may be subject to pooling, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging this application at a later date.

Very truly yours,

WILLIAM F. CARR

ATTORNEY FOR AMERIND OIL COMPANY

WFC/mlh

BEFORE THE

#### OIL CONSERVATION DIVISION

### NEW MEXICO DEPARTMENT OF ENERGY, MINERALS,

AND NATURAL RESOURCES

RECEIVED

AUG 1 8 1987

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE	NO.	

#### APPLICATION

COMES NOW AMERIND OIL COMPANY, 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 Strawn and Atoka formations in and under the W/2 SW/4 of Section 27, Township 16 South, Range 37 East, N.M.P.M., Lea County, New Mexico, and in support thereof would show the Division:

- 1. Applicant owns approximately 91% of the working interest in and under the W/2 SW/4 of Section 27, and Applicant has the right to drill thereon.
- 2. Applicant proposes to dedicate the above-referenced pooled unit to a well to be located at a standard location in the NW/4 SW/4 of said Section 27.

- 3. Applicant has sought and obtained either voluntary agreement for pooling or farmout from all other interest owners in the W/2 SW/4 of said Section 27, except for the interest owners identified on Exhibit A to this application.
- 4. Said pooling of interests 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 a duly appointed examiner of the Oil Conservation Division on September 9, 1987, and that after notice and hearing as required by law, the Division 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, and making such other and further provisions as may be proper in the premises.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM F. CARR
Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

ATTORNEYS FOR AMERIND OIL COMPANY

# EXHIBIT A

# INTEREST OWNERS

Douglas Cone Post Office Box 13612 Albuquerque, New Mexico 87123		1/480	
Clifford Cone Post Office Box 1509 Lovington, New Mexico 88260		1/480	
Standard Oil Production Co. 9401 Southwest Freeway Suite 1200 Houston, Texas 77074		1/480	
Enstar Petroleum Co. c/o Union Texas Petroleum 1330 Post Oak Blvd. Houston, Texas 77256 Attn: Ms Lael Henning		3.0156	2 ac.
Petco Limited and PC Ltd. Post Office Box 911 Breckenridge, Texas 76024 Attn: Ms Frankie Jenkins		1/48	
Ann Morris, individually and as Independent Executrix of the Estate of J. Norman Morris, deceased 2865 MacVicar Topeka, Kansas 66611		.6249	ac.
J. V. Ringold address unknown	Unleased	1/768 Mineral	Interest
J. D. Parks address unknown	Unleased	1/768 Mineral	Interest
H. M. Parks address unknown	Unleased	1/768 Mineral	Interest
C. W. Parks address unknown	Unleased	1/768 Mineral	Interest
Ruth Armstrong address unknown	Unleased	1/384 Mineral	Interest
Luther Emory address unknown	Unleased	1/256 Mineral	Interest
Lenore Parks, a widow for life with remainder to Mrs. Robert L. Christopher	Unleased	1/320 Mineral	Interest

address unknown

10 SIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

	1000 11010.007	
-506	Clifford Cone	
. 153	Street and No Post Office Box	1509
U.S.G.P.O. 153-506	P.O. State and ZIP Code Lovington, NM 8	8260
U.S	Postage	5 .22
	Certified Fee	،75
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	٥٢,
198	Return Receipt showing to whom, Date, and Address of Delivery	
June	TOTAL Postage and Fees	s 1.67
3800,	Postmark or Date	
PS Form 3800, June 1985	०१-१६-६७	

PS Form 3811, Feb. 1986 Clifford Cone
Post Offi 5. Signature - Addressee Put your address in the "RETURN TO" space on the reverse side. Fallure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are syallable. Consult postmaster for fees and check box(gs) for additional service(s) requested. Post Office Box 1509 1. 图 Show to whom delivered, date, and addressee's address. 2. 日 Restricted Delivery. Lovington, New Mexico 88260 SENDER: Complete Items 1 and 2 when additional services are desired, and complete Items 3 and 4. ٧., 8. Addressage's A Always obtain signature of addressee or agent and DATE BELIVERED. Registered
Certified COD
Express Mail 4. Article Number P 573-873-663 Type of Service: DOMESTIC RETURN RECEIPT

Douglas Cone

Post Office Box 13612

Albuquerque, NM 87123

,22

,75

DOMESTIC RETURN RECEIPT	DOMESTIC	PS Form 3811, Feb. 1986
		7. Date of Delivery & 19 - 8-7
		× Maillan Ope
	-	6. Signature - Agent
ss (ONLY if	8. Addressee's Address (ONLY if requested and fee paid)	5. Signature — Addressee X
ure of addressee or LIVERED.	Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .	
Insured COD	Registered Certified Express Mail	
••	Type of Service:	Post Office Box 13512
-664	P 573-873-664	Douglas Cone
	4. Article Number	3. Article Addressed to:
ted Delivery.	ss. 2. Aestricted Delivery.	1. 🖾 Show to whom delivered, date, and addressee's address.
s will prevent this of the person available. Consult	side. Failure to do the provide you the name following services are s) requested.	Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
mplete items 3 and 4.	ces are desired, and co	SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

P-573 873 661 Enstar Petroleum Co. Texas Petroleum 1330 Post Oak Blvd. Houston, Texas .75 '77 8-18-87

DOMESTIC RETURN RECEIPT	S Form 3811, Feb. 1986
	7. Date of Delivery
	6. Signature – Agent X
b. Addressee's Address (UNLY IJ requested and fee paid)	X Addressee
Always obtain signature of addressee or agent and DATE DELIVERED.	
☐ Registered ☐ Insured ☐ COD ☐ Express Mail	c/o Union Texas Petroleum 1330 Post Oak Blvd. Houston, Texas 77256
P 573-873-661 Type of Service:	Enstar Petroleum Co.
4. Article Number	3. Article Addressed to:
rovide you the name of the person following services are available. Consult requested.  2.	card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.  1.   Show to whom delivered, date, and addressee's address.  2.   Restricted Delivery:
es are desired, and complete items 3 and 4.	SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this

Petco Limited & PC Ltd. Petco Property Petco Property 08-18-87

card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are svallable. Consult postmaster for figs and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address.

2. Restricted Delivery. 3. Article Addressed to: Sigpature — Agen; 5. Signature - Addressee Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this Form 3811, Feb. 1986 Date of Delivery SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Breckenridge, Texas 76024 Post Office Box 911 Petco Limited and PC Ltd. Attn: Ms Frankie Jenkins Registered
Certified
Express Mail 4. Article Number 8. Addressee's Address (ONLY if requested and fee paid) agent and DATE DELIVERED. Always obtain signature of addressee or P 573-873-660 Type of Service: DOMESTIC RETURN RECEIPT Insured COD

P-573 873 662

RECRIPT FOR C.E. MAIL

MOINTERNATION OF STATEMATICAL CONTROL

(See Reverse)

	1200110181361		
J.S.G.P.O. 153-506	Sent to Standard Oil Pro Street and No. Suite 12 9401 Southwest 1	oducing 200 Freeway	Со
.G.P.	PO. State and ZIP Code Houston, TX 770		
S'A	Postage	\$ ,22	
	Cartilled Fee	75	
	Special Delivery Fee		
	Restricted Delivery Fee		
r.	Ruturn Receipt showing to whom and Date Delivered	، ۲٥	
<b>19</b> 8	Return Receipt showing to whom, Date, and Address of Delivery		
PS Form 3800, June 1985	TOTAL Postage and Fees	51.67	
3800	Postmark or Date		
E JO	08-18-87		
PS	•		

PS Form 3811, Feb. 1986	6. Signature – Agent	5. Signature — Addressee		Suite 1200 $\Lambda$ 9 Houston, Texas 77074	Standard Oil Producing (	1. X Show to whom delivered 3. Article Addressed to:	card from being returned to you delivered to and the date of del postmaster for fees and check be
AUG 24 1987	2			77074	oducing Co	i, date, and addressee's address	u. The return receipt fee will p ivery. For additional fees the f oox(es) for additional service(s
DOMESTIC RETURN RECEIPT		8. Addressee's Address (ONLY if requested and fee paid)	Always obtain signature of addressee or a sgent and DATE DELIVERED.	Registered  Certified  Express Mail	P 573-873-662	. 赵 Show to whom delivered, date, and addressee's address. "如 2. L. Restricted Delivery." . Article Addressed to:	card from being returned to you. The return receipt fee will provide you the name of the person additional fees the following services are available. Consult delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

SENDER: Complete Items 1 and 2 when additional services are desired, and complete Items 3 and 4.

7,77

Ann Morris, ind	lividu	ıally
2865 MacVicar	erromana.	and
Topeka, Kansas	6661	
And the second of the second o	,2	
Community	75	cut
		ŢŢ.
		ze
	رک	sta
		te
	1.67	Mo
and the second of the second o		r. T
08-18-87		ທ

DOMESTIC RETURN RECEIPT	S Form 3811, Feb. 1986
	7. Date of Delivery
	٥
	6. Signature - Agent
requestea ana Jee paia)	But a Mario
8. Addressee's Address (ONLY if	5. Signature - Addressee
Always obtain signature of addressee or agent and DATE DELIVERED.	Topeka, Kansas 66611
LL Express Mail	2865 MacVicar
Certified COD	sed.
	state of
Type of Service:	and as Independent
P 573-873-665	Ann Morris, individually
4. Article Number	3. Article Addressed to:
s. 2. Aestricted Delivery.	1. A Show to whom delivered, date, and addressee's address.
) requested.	postmaster for fees and check box(es) for additional service(s) requested.
side. Failure to do this will prevent this provide you the name of the person following socializes are available. Consult	Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivery. For additional fees the failure requires are available. Consults
es are desired, and complete items 3 and 4.	SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4,

Confit Contraction of the state

#### NEW MEXICO OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF AMERIND OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 9209

#### AFFIDAVIT

STATE OF NEW MEXICO)
)ss.
COUNTY OF SANTA FE )

William F. Carr, attorney in fact and authorized representative of Amerind Oil Company, the Applicant herein, being first duly sworn, upon oath, states that the notice provisions of Rule 1207 of the New Mexico Oil Conservation Division have been complied with, that Applicant has caused to be conducted a good faith diligent effort to find the correct addresses of all interested persons entitled to receive notice as shown by Exhibit "A" attached hereto, and that pursuant to Rule 1207, notice has been given at the correct addresses provided by such rule.

WILLIAM F. CARR

SUBSCRIBED	AND	SWORN	to	before	me	this	8th	day	of
September, 1987.				Day	ساعة	Jeun			
				Î	Nota	ry Pub	lic		

My Commission Expires:

# EXHIBIT A

# INTEREST OWNERS

Douglas Cone Post Office Box 13612 Albuquerque, New Mexico 87123		1/480	
Clifford Cone Post Office Box 1509 Lovington, New Mexico 88260		1/480	
Standard Oil Production Co. 9401 Southwest Freeway Suite 1200 Houston, Texas 77074		1/480	
Enstar Petroleum Co. c/o Union Texas Petroleum 1330 Post Oak Blvd. Houston, Texas 77256 Attn: Ms Lael Henning		3.01562	2 ac.
Petco Limited and PC Ltd. Post Office Box 911 Breckenridge, Texas 76024 Attn: Ms Frankie Jenkins		1/48	
Ann Morris, individually and as Independent Executrix of the Estate of J. Norman Morris, deceased 2865 MacVicar Topeka, Kansas 66611		.6249 a	ac.
J. V. Ringold address unknown	Unleased	1/768 Mineral	Interest
J. D. Parks address unknown	Unleased	1/768 Mineral	Interest
H. M. Parks address unknown	Unleased	1/768 Mineral	Interest
C. W. Parks address unknown	Unleased	1/768 Mineral	Interest
Ruth Armstrong address unknown	Unleased	1/384 Mineral	Interest
Luther Emory address unknown	Unleased	1/256 Mineral	Interest
Lenore Parks, a widow for life with remainder to Mrs. Robert L. Christopher	Unleased	1/320 Mineral	Interest

address unknown