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

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OIL COADERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF SUN EXPLORATION AND PRODUCTION COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 9271

## APPLICATION

COMES NOW, Sun Exploration and Production Company and applies to the Oil Conservation Division of the State of New Mexico for an order pooling all mineral interests from 8800 feet to 100 feet below the deepest producing formation underlying the S/2 of Section 15, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico for the formation of a proration and spacing unit for said production and in support thereof would show the Commission:

- 1. Applicant is the owner of the right to drill and develop the S/2 of Section 15, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico.
- 2. Applicant proposes to drill a well at a standard location in the Redlake Atoka Morrow Pool and to dedicate the S/2 of said Section to the Well.
- 3. Applicant has sought to obtain the cooperation and voluntary participation of all parties.

- 4. In order to obtain its just and equitable share of the production underlying the above lands, lands, Applicant needs an order pooling the mineral interests involved.
- 5. Those who have not consented to join in the drilling of the well, with their addresses, to the best of Applicant's knowledge and belief, are as follows:

Amoco Production Company Post Office Box 3092 Houston, Texas 77253 Attn: Betsy Rumley Visser

The foregoing interest totals 31.25 percent working interest.

6. The party named in paragraph 5 above has been furnished a copy of this Application in accordance with NMOCC Rule 1207.

WHEREFORE, Applicant prays that this matter be set for hearing on December 2, 1987 before the Division's duly apppointed Examiner, and that, after notice and hearing, the Division enter its order pooling the interests described herein. Applicant further prays that it be named operator of said well, that the Order make provision for Applicant to recover, out of production, its costs of drilling the subject well, completing and equipping it, all costs of operation,

including costs of supervision and a risk factor in the amount of two hundred percent (200%) for the drilling of the Well and for such other and further relief as may be appropriate.

Respectfully submitted,

Sun Exploration & Production Company

By:

KELLAHIN, KELLAHIN & AUBREY

Post Office Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

Βv

Karen Aubrey

## CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Application to be mailed to:

Amoco Production Company Post Office Box 3092 Houston, Texas 77253 Attn: Betsy Rumley Visser

by certified mail, return receipt requested on this 9th day of November, 1987.