LAW OFFICES WATSON & WATSON carper building - p. oxidox xx Drawer E SHERWOOD 6-4151 NEIL B. WATSON ARTESIA, NEW MEXICO FRED A. WATSON May 13, 1964 New Mexico Oil Conservation Commission, State Land Office Building, And habre. Santa Fe, New Mexico. Attention: Mr. Daniel S. Nutter Dear Mr. Nutter: Proposed water flooding of Grayburg Formation under Turkey Track Field, Eddy County, New Mexico, R. C. Davoust Company, operator. Pursuant to our telephone conversation of this date, we now make application on behalf of Richard C. Davoust and R. C. Davoust Company to carry out a program of water flooding of the Grayburg Formation under a part of Section 3, Township 19 South, Range 29 East, N.M.P.M., Eddy County, New Mexico, by injecting water into the Grayburg Formation through three wells as follows: Two wells drilled and completed as injection wells at unorthodox locations in Section 3, Township 19 South, Range 29 East, N.M.P.M., as follows: Spencer Well No. 12-W, located 5 feet from the South Line and 5 feet from the East Line of Unit C.

State Well No. 18-W, located 5 feet from the South Line and 5 feet from the East Line of Unit K.

Also, one producing oil well to be converted to an injector well drilled at an orthodox location in Section 3, Township 19 South, Range 29 East, N.M.P.M., and located 660 feet from the North Line and 660 feet from the East Line of Unit H.

As you are aware, Richard C. Davoust and R. C. Davoust Company are presently carrying on a program of water flooding of the Queen Sand (Red Sand) Formation under said Section 3, as more particularly reflected by Order No. R-2671 entered in Case No. 3010 before the Conservation Commission. I am not entirely certain whether the authority sought herein can be granted only after hearing. If the injection through the above mentioned wells into the Grayburg Formation requires a hearing, please set the case on the docket for the next hearing date and issue the necessary Notice of publication.

Your consideration in this matter will be greatly appreciated.

Yours very truly,

WATSON & WATSON

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FAW:rjb

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## Page No. 2

cc: Mr. Richard C. Davoust, P. O. Box 266, Evansville, Indiana.

> Mr. William E. Fickert, Ryder Scott Company, 306 Wilkinson-Foster Building, Midland, Texas.

Mr. Frank E. Irby, Chief, Water Right Division, Office of the State Engineer, P. O. Box 1079, Santa Fe, New Mexico.