LAW OFFICES OF

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GEORGE H. HUNKER, JR. DON M. FEDRIC RONALD M. HIGGINBOTHAM ROBERT I. WALDMAN

April 29, 1975

A.L. Porter, Jr., Secretary-Director New Mexico Oil Conservation Commission P.O. Box 2088 Santa Fe, New Mexico 87501

> Re: Case Nos. 5464 and 5465 Petro-Lewis

Dear Mr. Porter:

In connection with the above cases, we hand you herewith our Entry of Appearance in duplicate. We anticipate coming to Santa Fe for the hearing on April 30, and feel sure we will be in the hearing room by 9:45 A.M., assuming our plane is not delayed.

Please file our Appearances in the above causes. Thank you very much for your assistance.

Sincerely yours,

HUNKER, FEDRIC & HIGGINBOTHAM, P.A.

George H. Hunker, Jr.

GHH:dd Enc.

cc: Mr. Jason W. Kellahin, w/enc.

## BEFORE THE OIL CONSERVATION COMMISSION

## STATE OF NEW MEXICO

IN THE MATTER OF

APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF A PRESSURE MAINTENANCE PROJECT, Case No. 5465 SANDOVAL COUNTY, NEW MEXICO, and APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF Case No. 5464 UNIT AGREEMENT, SANDOVAL COUNTY, NEW MEXICO

## ENTRY OF APPEARANCE

COMES NOW George H. Hunker, Jr., of the law firm of Hunker, Fedric & Higginbotham, P.A., and enters his appearance herein in the above styled and numbered case on behalf of the Respondents, John K. Reimer and R.E. McKenzie, Jr. DATED this **OFS** day of April, 1975.

HUNKER, FEDRIC & HIGGINBOTHAM, P.A.

George H**Ol**unker Jr.

Attorneys for John K. Reimer and R.E. McKenzie, Jr. P.O. Box 1837 Roswell, New Mexico 88201

I hereby certify that I have mailed a true copy of the foregoing instrument to opposing counsel of record, Mr. Jason W. Kellahin, this day of April, 1975.

George H lunker.

### BEFORE THE OIL CONSERVATION COMMISSION

#### STATE OF NEW MIXICO

#### IN THE MATTER OF

APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF A PRESSURE MAINTENANCE PROJECT, SANDOVAL COUNTY, NEW MEXICO, and APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF UNIT AGREEMENT, SANDOVAL COUNTY, NEW MEXICO

Case No. 5465

Case No. 5464

### ENTRY OF APPFARANCE

COMES NOW George H. Hunker, Jr., of the law firm of Hunker, Fedric & Higginbotham, F.A., and outers his appearance herein in the above styled and numbered case on behalf of the Respondents, John K. Reimer and E.F. EcKenzie, Jr. DATED this **287** day of April, 1975.

HUMBER, FEDRIC & HIGGINBOTHAM, P.A.

Junker, Jr. George H.

Attorneys for John K. Reimer and R.E. McKenzie, Jr. P.O. Box 1837 Roswell, New Mexico 88201

I hereby certify that I have mailed a true copy of the foregoing instrument to opposing counsel of record, Mr. Jason W. Kellahin, this 200 Cay of April, 1975.

N eorge Hunker,

### BEFORE THE

OIL CONSERVATION COMMISSION OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF UNIT AGREEMENT, SANDOVAL COUNTY, NEW MEXICO

5464

# APPLICATION

Comes now Petro-Lewis Corporation and applies to the Oil Conservation Commission of New Mexico for approval of its Media Entrada Unit Agreement for the operation of the Media Entrada Oil Pool, Sandoval County, New Mexico, and in support thereof would show the Commission:

1. The Media Entrada Unit Agreement embraces an area of 580 acres, effectively covering all of the producing area of the Media Entrada Oil Pool as defined by the Commission.

2. All of the acreage embraced within the unit area is Federal acreage, and the form of Unit Agreement has been submitted to the United States Geological Survey, Department of the Interior, for preliminary approval and designation of the unit area.

3. All of the working interest owners within the area embraced by the Unit Agreement have agreed to the formation of the unit and to the form and content of the proposed unit agreement.

4. The purpose of the unit agreement is the institution of a pressure maintenance project by water injection into the Media Entrada pool. 5. Approval of the proposed Media Entrada Unit Agreement is in the interests of conservation, will prevent waste, will protect correlative rights, and result in the recovery of oil that would not otherwise be recovered.

WHEREFORE applicant prays that this application be set for hearing before the Oil Conservation or its duly appointed examiner, and that after notice and hearing as required by law the Commission enter its order approving the Media Entrada Unit Agreement.

> Respectfully submitted, Petro-Lewis Corporation

W. Kellah XELLAHIN & FOX P. O. Box 1769 Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT

-2-

#### BEFORE THE

### OIL CONSERVATION COMMISSION OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF UNIT AGREEMENT, SANDOVAL COUNTY, NEW MEXICO

Case 5-464

#### APPLICATION

Comes now Petro-Lewis Corporation and applies to the Oil Conservation Commission of New Mexico for approval of its Media Entrada Unit Agreement for the operation of the Media Entrada Oil Pool, Sandoval County, New Mexico, and in support thereof would show the Commission:

1. The Media Entrada Unit Agreement embraces an area of 580 acres, effectively covering all of the producing area of the Media Entrada Oil Pool as defined by the Commission.

2. All of the acreage embraced within the unit area is Federal acreage, and the form of Unit Agreement has been submitted to the United States Geological Survey, Department of the Interior, for preliminary approval and designation of the unit area.

3. All of the working interest owners within the area embraced by the Unit Agreement have agreed to the formation of the unit and to the form and content of the proposed unit agreement.

4. The purpose of the unit agreement is the institution of a pressure maintenance project by water injection into the Media Entrada pool. 5. Approval of the proposed Media Entrada Unit Agreement is in the interests of conservation, will prevent waste, will protect correlative rights, and result in the recovery of oil that would not otherwise be recovered.

WHEREFORE applicant prays that this application be set for hearing before the Oil Conservation or its duly appointed examiner, and that after notice and hearing as required by law the Commission enter its order approving the Media Entrada Unit Agreement.

> Respectfully submitted, Petro-Lewis Corporation

'elle KELLAHIN & FOX P. O. Box 1769 Santa Fe, New Mexico 87501 ATTORNEYS FOR APPLICANT

#### BEFORE THE

OIL CONSERVATION COMMISSION OF NEW MEXICO

Case 5464

IN THE MATTER OF THE APPLICATION OF PETRO-LEWIS CORPORATION FOR APPROVAL OF UNIT AGREEMENT, SANDOVAL COUNTY, NEW MEXICO

# APPLICATION

Comes now Petro-Lewis Corporation and applies to the Oil Conservation Commission of New Mexico for approval of its Media Entrada Unit Agreement for the operation of the Media Entrada Oil Pool, Sandoval County, New Mexico, and in support thereof would show the Commission:

1. The Media Entrada Unit Agreement embraces an area of 580 acres, effectively covering all of the producing area of the Media Entrada Oil Pool as defined by the Commission.

2. All of the acreage embraced within the unit area is Federal acreage, and the form of Unit Agreement has been submitted to the United States Geological Survey, Department of the Interior, for preliminary approval and designation of the unit area.

3. All of the working interest owners within the area embraced by the Unit Agreement have agreed to the formation of the unit and to the form and content of the proposed unit agreement.

4. The purpose of the unit agreement is the institution of a pressure maintenance project by water injection into the Media Entrada pool.

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5. Approval of the proposed Media Entrada Unit Agreement is in the interests of conservation, will prevent waste, will protect correlative rights, and result in the recovery of oil that would not otherwise be recovered.

WHEREFORE applicant prays that this application be set for hearing before the Oil Conservation or its duly appointed examiner, and that after notice and hearing as required by law the Commission enter its order approving the Media Entrada Unit Agreement.

> Respectfully submitted, Petro-Lewis Corporation

. w. Killa aso KELLAHIN & FOX P. O. Box 1769 Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT

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