KELLAHIN, KELLAHIN and AUBREY

Attorneys at Law

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Jason Kellahin Of Counsel El Patio - 117 North Guadalupe Post Office Box 2265

Santa Fé, New Mexico 87504-2265

May 2, 1989

Telephone 982-4285 Area Code 505

HAND DELIVERED

RECEIVED

William J. LeMay Director Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

MAY 2 1989

OIL CONSERVATION DIVISION

Re: Application of Kerr-McGee Corporation for Statutory

Unitization, Chaves County, New Mexico

10 9682

Dear Mr. LeMay:

Enclosed are the original and one copy of the application of Kerr-McGee for statutory unitization which we would appreciate being set for hearing on the Examiner's docket on May 24, 1989.

We are sending all affected parties copies of the application and this letter by certified mail.

Sincerely

Karen Aubrey

KA/rs Encl.

cc: All persons on attached service list

Service List

Floyd Prondo State Land Office, with C-108 P.O. Box 1148 Santa Fe, New Mexico 87504-1148

Paul Davis, Thomas E. Davis, Jr., Marqurete S. Davis and Thomas H. Davis, trustees for H.H. and Marqurete S. Davis Trust dated 6/16/87 South Star Route Elida, New Mexico 88116

Finus M. and Laura J. Tucker Revocable Trust United New Mexico Trust Company P.O. Box 1927 Roswell, New Mexico 88201

Murphy Operating Company P.O. Box 2648 Roswell, New Mexico 88202 Attn: Ann Murphy Ezzell

Fina Oil and Chemical Company P.O. Box 2990 Midland, Texas 79701

Yates Petroleum Corporation Yates Building 207 South Fourth Artesia, New Mexico 88210

Bristol Resources Corporation 3601 East 51st Street Suites B & C Tulsa, Oklahoma 74136 Attn. Mr. Bob Key

Warren American Oil Company P.O. Box 971 Midland, Texas 70702 Attn: Mr. James A. O'Neill

Marathon Oil Company P.O. Box 552 Midland, Texas 79702

BEFORE THE OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY,

MINERALS AND NATURAL RESOURCES

MAY 2: 3

QIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF KERR-MCGEE CORPORATION FOR APPROVAL OF STATUTORY UNITIZATION, CHAVES COUNTY, NEW MEXICO

CASE NO. 9682

APPLICATION

COMES NOW KERR-MCGEE CORPORATION, by and through its attorneys, Kellahin, Kellahin & Aubrey, and pursuant to the provision of the Statutory Unitization Act (Sections 70-7-1 through 70-7-21, N.M.S.A., 1978 Comp.) hereby applies to the New Mexico Oil Conservation Division for an order unitizing the K-M CHAVEROO SAN ANDRES UNIT, Chaves County, New Mexico, and in support of its application states:

- 1. Kerr-McGee Corporation is a Delaware corporation authorized to transact business in the State of New Mexico, is engaged in the business of, among other things, producing and selling oil and gas and seeks to be designated operator of the K-M Chevroo San Andres Unit.
- 2. The proposed unit area for which this application is made consists of 1280.37 acres, more or less, of State of

New Mexico lands located in Chaves County, New Mexico, and is more particularly described in Exhibit A attached hereto and incorporated herein by reference. Kerr-McGee Corporation seeks an order pursuant to the Statutory Unitization Act providing for unitized management, operation and further development of the project area.

- 3. The vertical limits of the formation to be included within the proposed unit area includes that interval known as the San Andres formation which extends from 4211 feet to 4341 feet as measured on the compensated formation density log run in the Kerr-McGee Corporation State "F" Well No. 1 on April 29, 1966, said well located 660 feet from the North line and 660 feet from the West line of Section 2, Township 8 South, Range 33 East, Chaves County, New Mexico. The Unitized Formation shall further include all subsurface points throughout the Unit which are correlative to the aforementioned identified depths.
- 4. The portion of the reservoir involved in this application has been reasonably defined by development.
- 5. The type of operations to be conducted in this unit is secondary recovery by means of water flooding.
- 6. Attached to this application as Exhibit B and incorporated herein by reference is a copy of the proposed plan of unitization which Kerr-McGee considers fair, reasonable and equitable.

- 7. Attached to this application as Exhibit C and incorporated herein by reference is a copy of the proposed operating plan covering the manner in which the unit will be supervised and managed and costs allocated and paid.
- 8. Kerr-McGee Corporation has obtained the concurrence of at least 94% of the working interest ownership within the unit area of the proposed plan of unit operations, thereby assuring effective and efficient control of the unit.
 - 9. Kerr-McGee Corporation further states:
 - a. Unitized management, operating and further development of the K-M Chaveroo San Andres Unit is reasonably necessary in order to effectively carry on secondary recovery and to substantially increase the ultimate recovery of oil from the unitized portion thereof.
 - b. Unitized methods of operations applied to the K-M Chaveroo San Andres Unit are feasible, will prevent waste and will result with reasonable probability in the increased recovery of substantially more oil than would otherwise be recovered.
 - c. The estimated additional costs, if any, of conducting such operations will not exceed the estimated value of additional oil so recovered plus reasonable profit.

- d. Unitization and adoption of unitized methods of operation will benefit the working interest owners, royalty owners and overriding royalty owner of the oil and gas rights within the pool.
- e. Kerr-McGee Corporation, as operator, has made a good faith effort to secure voluntary unitization of all interests in the pool.
- f. The participation formula contained in the unitization agreement allocated the produced and saved unitized hydrocarbons to the separately owned tracts in the unit area on a fair, reasonable and equitable basis.
- 9. Statutory unitization of the San Andres formation is in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Kerr-McGee Corporation respectfully requests that this application be set for hearing before a duly appointed Examiner of the Oil Conservation Division on May 24, 1989, and, that after notice and hearing as required by law and the rules of the Division, the Division enter its order granting this application to statutorily unitize the San Andres formation, Chaves County, New Mexico.

Respectfully submitted,

Karen Aubrey

Kellahin, Kellahin & Aubrey

Post Office Box 2265

Santa Fe, New Mexico 87504 -

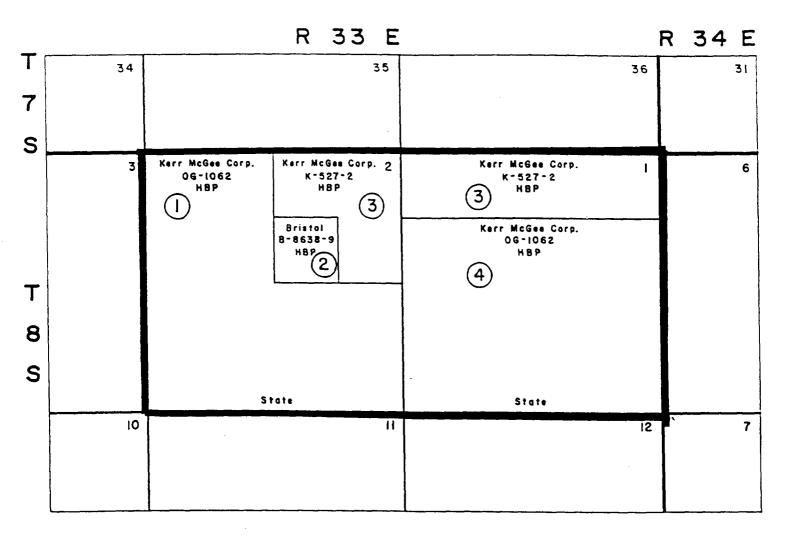
(505) 982-4285

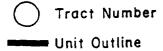
Attorneys for Kerr-McGee Corporation

EXHIBIT "A"

K-M CHAVEROO SAN ANDRES UNIT

CHAVES COUNTY, NEW MEXICO





1280.37 Acres 100% Unit Area Scale: 1"= 2000'