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June 16, 1998

**HAND-DELIVERED**

12007

Lori Wrotenberry, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
2040 South Pacheco Street  
Santa Fe, New Mexico 87503

Re: *Application of Petroleum Development Corporation for Approval of a Unit Agreement, Lea County, New Mexico*

Dear Ms. Wrotenberry:

Enclosed in triplicate is the Application of Petroleum Development Corporation ("PEDCO") in the above-referenced case as well as a copy of the legal advertisement. PEDCO respectfully requests that this matter be placed on the docket for the July 9, 1998 Examiner hearings.

Very truly yours,



WILLIAM F. CARR

WFC:mlh  
Enclosures

cc: Don C. Pfiester, President (w/enclosures)  
Energy Pro, Inc.  
500-A S. Hangar Drive  
Georgetown, TX 78628

**BEFORE THE**

**OIL CONSERVATION DIVISION**

**NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES**

IN THE MATTER OF THE APPLICATION  
OF PETROLEUM DEVELOPMENT CORPORATION  
FOR APPROVAL OF A UNIT AGREEMENT,  
LEA COUNTY, NEW MEXICO.

CASE NO. 12007

**APPLICATION**

PETROLEUM DEVELOPMENT CORPORATION ("PEDCO"), through its undersigned attorneys, hereby makes application for an order approving its T.P. "A" State Unit Agreement and in support of this application would show the Division:

1. That the proposed Unit consists of 160 acres, more or less, of State lands, situated in Lea County, New Mexico. The horizontal limits of said unit are described as follows:

**Township 10 South, Range 36 East, NMPM**

Section 15: W/2 SW/4

Section 16: E/2 SE/4

2. The Unit Agreement has been approved by a sufficient percentage of the interest owners within the proposed Unit Area to provide effective control of unit operations.

3. The Applicant, PEDCO, is designated as Unit Operator in said Unit Agreement and all oil and gas in any and all formations is unitized.

4. The proposed Unit Area covers all, or substantially all, of the geological structures or anomaly involved.

5. Said Unit Agreement and the unitized operation and management of the Unit Area will be in the interest of conservation and the prevention of waste, and that it will protect the correlative rights of all parties concerned.

WHEREFORE, Petroleum Development Corporation requests that this application be set for hearing before an Examiner of the Oil Conservation Division on July 9, 1998, that notice be given as required by law and the rules of the Division, and that the T.P. "A" State Unit Agreement be approved.

Respectfully submitted,

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.

By: 

WILLIAM F. CARR  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR PETROLEUM  
DEVELOPMENT CORPORATION

CASE NO. /200/ Application of Petroleum Development Corporation for a Unit Agreement, Lea County, New Mexico. Applicant seeks approval of the T.P. "A" State Unit Agreement for an area comprising 160 acres of State lands in portions of Sections 15 and 16, Township 10 South, Range 36 East, which is located approximately \_\_\_\_\_ miles \_\_\_\_\_ of \_\_\_\_\_, New Mexico.