# KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

SANTA FE, NEW MEXICO 875 RECEIVED July 2, 1991

JASON KELLAHIN OF COUNSEL

KAREN AUBREY

W. THOMAS KELLAHIN

JUL 02 1991

OIL CONSERVATION DIV. SANTA FE HAND DELIVERED

Mr. William J. LeMay Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87504

Re: Application of Oryx Energy Company to Reopen Case No. 9928 and Amend Order No. R-9185, Well Name: Ojo Chiso Federal No. 3 W/2 Section 26, T22S, R34E, Lea County, New Mexico

Dear Mr. LeMay:

On behalf of Oryx Energy Company please find enclosed our Application to Reopen Case No. 9928 and Amend Order No. R-9185 to add the Morrow formation, which we would request be set for hearing on the next available Examiner's docket now scheduled for July 25, 1991.

By copy of this letter to all parties, we are notifying them by certified mail, return-receipt requested, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support or in opposition to the Application.

Very truly your Thomas Kellahin

WTK/tic Enclosure Mr. William J. LeMay July 2, 1991 Page 2

cc: Charles Gray Oryx Energy Company Post Office Box 2880 Dallas, Texas 75221-2880

> Certified mail return-receipt All parties listed in application

1811/appt701.042

### STATE OF NEW MEXICO

# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

JUL 02 1991

OIL CONSERVATION DIV

IN THE MATTER OF THE APPLICATION OF ORYX ENERGY COMPANY TO REOPEN CASE NO. 9928 AND TO AMEND ORDER NO. R-9185, LEA COUNTY, NEW MEXICO

CASE NO. 9928 (REOPEN)

### APPLICATION

COMES NOW, ORYX ENERGY COMPANY, by and through its attorneys, KELLAHIN, KELLAHIN & AUBREY, and applies to the New Mexico Oil Conservation Division to Reopen Case No. 9928 and amend Order No. R-9185 for approval to deepen the previously approved unorthodox gas well location to the base of the Morrow Pool, Lea County, New Mexico, at a location 990 feet from the South line and 990 feet from the West line of Section 26, T22S, R34E, N.M.P.M., with the W/2 of said section being dedicated to the well, and in support thereof would show:

 Applicant is the operator and has the right to drill and develop the W/2 of Section 26, T22S, R34E, N.M.P.M., Lea County, New Mexico. 2. Applicant has drilled its Ojo Chiso Federal No. 3 well at an unorthodox location 990 feet from the South line and 990 and 990 feet from the West line of Section 26 as shown on Exhibit "A."

3. Order R-9185 authorized applicant to drill the subject well at an unorthodox location to test the Antelope Ridge-Atoka Gas Pool.

4. Applicant now seeks authority to deepen the subject well to test for production in the Morrow formation and to reopen the subject case to provide additional evidence to support this request.

5. That approval of the Application will be in the best interests of conservation, the protection of correlative rights and the prevention of waste.

6. The offsetting parties who have been notified by certified mail return-receipt are:

Amoco Production Company P.O. Box 3092 Houston, Texas 77253

BTA Oil Producers 104 S. Pecos Street Midland, Texas 79701

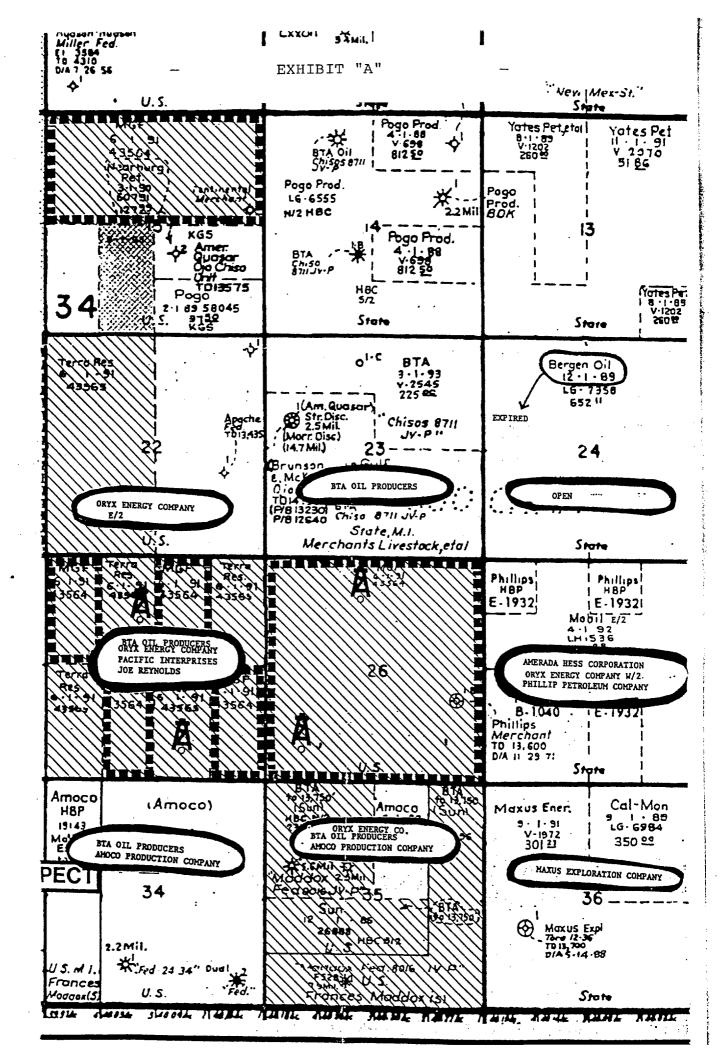
Maxus Exploration Company 717 North Harwood Street Dallas, Texas 75201 WHEREFORE, Applicant requests that this matter be set for hearing and that after said hearing the Application be granted as requested.

KELLAHIN, KELLAHIN & AUBREY

By: W. Thomas Kellahin

Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

1811/appt701.042



## KELLAHIN, KELLAHIN AND AUBREY

W. THOMAS KELLAHIN KAREN AUBREY ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265 SANTA FE, NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

CANDACE HAMANN CALLAHAN JASON KELLAHIN OF COUNSEL

April 5, 1990

#### HAND DELIVERED

Mr. William J. LeMay Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87504 RECEIVED

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OIL CONSERVATION DIVISION

Case 9928

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Re: Application of Oryx Energy Company for Unorthodox Well Location Well Name: Ojo Chiso Federal No. 3 W/2 Section 26, T22S, R34E, Lea County, New Mexico

Dear Mr. LeMay:

On behalf of Oryx Energy Company please find enclosed our Application of Unorthodox Well Location which we would request be set for hearing on the next available Examiner's docket now scheduled for May 2, 1990.

By copy of this letter to all parties, we are notifying them by certified mail, return-receipt requested, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support or in opposition to the Application.

Very truly vours W . Thomas Kel lahin

WTk/tic Enclosure

xc: Charles Gray Oryx Energy Company P.O. Box 2880 Dallas, Texas 75221-2880

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

RECEIVED

OIL CONSERVATION DIVISION

NO. 9928

IN THE MATTER OF THE APPLICATION OF ORYX ENERGY COMPANY FOR APPROVAL OF AN UNORTHODOX GAS WELL LOCATION, LEA COUNTY, NEW MEXICO

#### APPLICATION

Comes now ORYX ENERGY COMPANY, by and through its attorneys, KELLAHIN, KELLAHIN & AUBREY, and applies to the New Mexico Oil Conservation Division for approval of an unorthodox gas well location to be drilled to the base of the Morrow Pool, Lea County, New Mexico, at a location 990 feet from the South line and 990 feet from the West line of Section 26, T22S, R34E, N.M.P.M., with the W/2 of said section being dedicated to the well, and in support thereof would show:

 Applicant is the operator and has the right to drill and develop the W/2 of Section 26, T22S, R34E, N.M.P.M., Lea County, New Mexico.

2. Applicant proposes to drill its Ojo Chiso Federal No. 3 Well at an unorthodox location 990 feet from the South line and 990 feet from the West line of Section 26 as shown on Exhibit "A".

3. That approval of the Application will be in the best interests of conservation, the protection of correlative rights and the prevention of waste. 4. The offsetting parties who have been notified by certified mail return-receipt are:

> Amoco Production Company P.O. Box 3092 Houston, Texas 77253

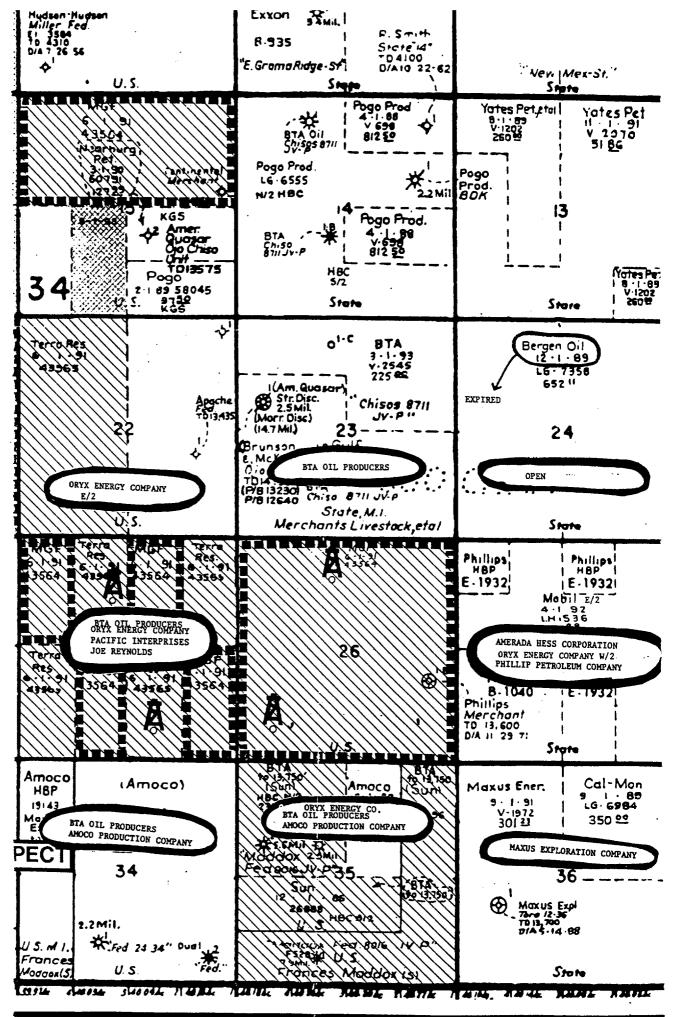
BTA Oil Producers 104 S. Pecos Street Midland, Texas 79701

Maxus Exploration Company 717 North Harwood Street Dallas, Texas 75201

WHEREFORE, Applicant requests that this matter be set for hearing and that after said hearing the Application be granted as requested.

KELLAHIN, KELLAHIN & AUBREY By:

W. Thomas Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285



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## KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265 SANTA FE, NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

KAREN AUBREY

W. THOMAS KELLAHIN

CANDACE HAMANN CALLAHAN JASON KELLAHIN

OF COUNSEL

April 5, 1990

# HAND DELIVERED

Mr. William J. LeMay Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87504

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**QIL CONSERVATION DIVISION** 

Case 9928

Application of Oryx Energy Company Re: for Unorthodox Well Location Well Name: Ojo Chiso Federal No. 2 E/2 Section 26, T22S, R34E, Lea County, New Mexico

Dear Mr. LeMay:

On behalf of Oryx Energy Company please find enclosed our Application of Unorthodox Well Location which we would request be set for hearing on the next available Examiner's docket now scheduled for May 2, 1990.

By copy of this letter to all parties, we are notifying them by certified mail, return-receipt requested, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support or in opposition to the Application.

Very truly yours, W. Thomas KU11 Ahin

WTk/tic Enclosure

Charles Gray xc: Oryx Energy Company P.O. Box 2880 Dallas, Texas 75221-2880 RECEIVED

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

RECEIVED

APR 0 1990

**OIL CONSERVATION DIVISION** 

NO. 9928

IN THE MATTER OF THE APPLICATION OF ORYX ENERGY COMPANY FOR APPROVAL OF AN UNORTHODOX GAS WELL LOCATION, LEA COUNTY, NEW MEXICO

#### APPLICATION

Comes now ORYX ENERGY COMPANY, by and through its attorneys, KELLAHIN, KELLAHIN & AUBREY, and applies to the New Mexico Oil Conservation Division for approval of an unorthodox gas well location to be drilled to the base of the Morrow Pool, Lea County, New Mexico, at a location 990 feet from the South line and 2030 feet from the East line of Section 26, T22S, R34E, N.M.P.M., with the E/2 of said section being dedicated to the well, and in support thereof would show:

 Applicant is the operator and has the right to drill and develop the E/2 of Section 26, T22S, R34E, N.M.P.M., Lea County, New Mexico.

2. Applicant proposes to drill its Ojo Chiso Federal No. 2 Well at an unorthodox location 990 feet from the South line and 2030 feet from the East line of Section 26 as shown on Exhibit "A".

3. That approval of the Application will be in the best interests of conservation, the protection of correlative rights and the prevention of waste. 4. The offsetting parties who have been notified by certified mail return-receipt are:

> Amoco Production Company P.O. Box 3092 Houston, Texas 77253

BTA Oil Producers 104 S. Pecos Street Midland, Texas 79701

Maxus Exploration Company 717 North Harwood Street Dallas, Texas 75201

WHEREFORE, Applicant requests that this matter be set for hearing and that after said hearing the Application be granted as requested.

KELLAHIN, KELLAHIN & AUBREY By:

W. Thomas Kellahin Post Office Box/2265 Santa Fe, New Mexico 87504 (505) 982-4285

