BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF BASS ENTERPRISES PRODUCTION CO., FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 11022

AFF	'IDA	Vľ	${f T}$

STATE OF NEW MEXICO)
) ss
COUNTY OF SANTA FE)

William F. Carr, attorney in fact and authorized representative of Bass Enterprises Production Co., the Applicant herein, being first duly sworn, upon oath, states that in accordance with the notice provisions of Rule 1207 of the New Mexico Oil Conservation Division the Applicant has attempted to find the correct addresses of all interested persons entitled to receive notice of this application and that notice has been given at the addresses shown on Exhibit "A" attached hereto as provided in Rule 1207.

William F. Carr

SUBSCRIBED AND SWORN to before me this 20th day of July, 1994.

Notary Public

My Commission Expires:

BEFORE THE
OIL CONSERVATION DIVISION
Santa Fe, New Mexico

Case No. <u>11022</u> Exhibit No. <u>5</u>

Submitted by: <u>Bass Enterprises Production Co.</u>

Hearing Date: July 21, 1994

EXHIBIT A

Phillips Petroleum Company 4001 Penbrook Odessa, TX 79762 Attn: Elizabeth Harris, Esq.

Mitchell Energy Company 400 W. Illinois Midland, TX 79701 Attn: Larry Cunningham

CAMPBELL, CARR, BERGE 8 SHERIDAN, P.A.

LAWYERS

JACK M. CAMPBELL

OF COUNSEL

JEFFERSON PLACE
SUITE I - 110 NORTH GUADALUPE
POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421

TELECOPIER: (505) 988-4421
TELECOPIER: (505) 983-6043

June 29, 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Phillips Petroleum Company 4001 Penbrook Odessa, TX 79762 Attn: Elizabeth Harris, Esq.

Re: Application of Bass Enterprises Production Co. for Compulsory Pooling, Eddy

County, New Mexico

Gentlemen:

This letter is to advise you that Bass Enterprises Production Co. has filed the enclosed application with the New Mexico Oil Conservation Division seeking the force pooling of certain mineral interests in all formations developed on 320-acre spacing to the base of the Morrow formation, in and under the S/2 of Section 12, Township 22 South, Range 30 East, N.M.P.M., Eddy County, New Mexico. Bass Enterprises Production Co. proposes to dedicate the referenced pooled unit to its James Ranch Unit No. 70 Well to be drilled at an orthodox location 660 feet from the South line and 1,980 feet from the East line of said Section 12.

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Parties appearing in cases have been requested by the Division (Memorandum 2-90) to file a Prehearing Statement substantially in the form prescribed by the Division. Prehearing statements should be filed by 4:00 o'clock p.m. on the Friday before a scheduled hearing.

J.

WILLIAM F. CARR

ATTORNEY FOR BASS ENTERPRISES PRODUCTION CO.

WFC:mlh

Enc.

cc: Mr. J. Wayne Bailey

LINITED STATES POSTAL SERVICE	F C N D (S

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_ <u>ē</u> ⊒	Phillips Petroleum Company
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CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

LAWYERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN

PATRICIA A. MATTHEWS MICHAEL H. FELDEWERT DAVID B. LAWRENZ TANYA M. TRUJILLO

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June 29, 1994

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Mitchell Energy Company 400 W. Illinois Midland, TX 79701 Attn: Larry Cunningham

Re: Application of Bass Enterprises Production Co. for Compulsory Pooling, Eddy

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Very truly yours,

WILLIAM F. CARR

ATTORNEY FOR BASS ENTERPRISES PRODUCTION CO.

WFC:mlh

Enc.

cc: Mr. J. Wayne Bailey

P 111 332 841 Receipt for Certified Mail
No Insurance Coverage Provided
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Attn: Larry Cunningham
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PS Form 3800, June 1991

CAMPBELL, CARR, BERGE 8 SHERIDAN, P.A.

MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN

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June 29, 1994

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ATTORNEY FOR BASS ENTERPRISES PRODUCTION CO.

WFC:mlh

Enc.

cc: / Mr. J. Wayne Bailey

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ATTORNEY FOR BASS ENTERPRISES PRODUCTION CO.

WFC:mlh

Enc.

cc: \sqrt{Mr} . J. Wayne Bailey

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SANTA FE, NEW MEXICO 87504-2208
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June 27, 1994

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

Re: Application of Bass Enterprises Production Co., for Compulsory Pooling, Eddy

County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Bass Enterprises Production Co., in the above-referenced case as well as a copy of a legal advertisement. Bass Enterprises Production Co., respectfully requests that this matter be placed on the docket for the July 21, 1994 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures

cc: Mr. J. Wayne Bailey (w/enclosures)
Bass Enterprises Production Co.
201 Main Street
Fort Worth, TX 76102-3131

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF BASS ENTERPRISES PRODUCTION CO. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE	NO	
	110.	

APPLICATION

BASS ENTERPRISES PRODUCTION CO., through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat.Ann. § 70-2-17, (1978), for an order pooling all mineral interests in all formations developed on 320-acre spacing in the S/2 of Section 12, Township 22 South, Range 30 East, N.M.P.M., Eddy County, New Mexico, and in support thereof states:

- 1. Applicant owns or represents approximately 62.5% of the working interest in the S/2 of Section 12, and Applicant has the right to drill thereon.
- 2. Applicant proposes to dedicate the above-referenced spacing or proration units to its James Ranch Unit No. 70 Well to be drilled at an orthodox location 660 feet from the South line and 1,980 feet from the East line of Section 12, to a depth of approximately 14,100 feet, more or less, to test any and all formations from the surface to the base of the Morrow formation.
- 3. Applicant has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the S/2 of said Section 12.
- 4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and

gas underlying the subject lands, all mineral interests should be pooled, and Applicant should

be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before an

Examiner of the Oil Conservation Division on July 21, 1994 and, after notice and hearing

as required by law, the Division enter its order pooling the lands, including provisions for

Applicant to recover its costs of drilling, equipping and completing the well, its costs of

supervision while drilling and after completion, including overhead charges, and imposing

a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the

well.

Respectfully submitted,

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

Rur '

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR BASS ENTERPRISES

PRODUCTION CO.

APPLICATION,

CASE	:

Application of Bass Enterprises Production Co., for compulsory pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Morrow formation, in all formations developed on 320-acre spacing, underlying the S/2 of Section 12, Township 22 South, Range 30 East. Said unit is to be dedicated to the James Ranch Unit No. 70 Well, to be drilled at a standard location 660 feet from the South line and 1,980 feet from the East line of said Section 12. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately _____ miles _____ of _____, New Mexico.