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September 26, 1996

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SEP 26 1996

New Mexico Oil Conservation Division  
Florene Davidson  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Oil Conservation Division

Re: Case No. 11,515 Order No. R-10659;  
In The Matter Of The Hearing Called By The Oil  
Conservation Division ("Division") On Its Own  
Motion To Permit Woosley Oil Company, Operator,  
American Employers' Insurance Company, Surety,  
And All Other Interested Parties To Appear And Show  
Cause Why Seven Certain Wells In McKinley County,  
New Mexico Should Not Be Plugged And Abandoned  
In Accordance with a Division-Approved Plugging  
Program

Dear Ms. Davidson:

Please find enclosed our original Application For Hearing De  
Novo on behalf of Commercial Union Insurance Companies and  
American Employers' Insurance Company. I also enclose one copy  
of the Application for you to conform and return to me. Thank  
you for your assistance.

Sincerely,



Edmund H. Kendrick

EHK:dlo  
Enclosures  
2222-96-02

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION  
("DIVISION") ON ITS OWN MOTION TO  
PERMIT WOOSLEY OIL COMPANY, OPERATOR,  
AMERICAN EMPLOYERS' INSURANCE  
COMPANY, SURETY, AND ALL OTHER  
INTERESTED PARTIES TO APPEAR AND  
SHOW CAUSE WHY SEVEN CERTAIN WELLS  
IN MCKINLEY COUNTY, NEW MEXICO,  
SHOULD NOT BE PLUGGED AND ABANDONED  
IN ACCORDANCE WITH A DIVISION-  
APPROVED PLUGGING PROGRAM.**

**CASE NO. 11,515  
ORDER NO. R-10659**

RECEIVED

SEP 26 1996

Oil Conservation Division

**APPLICATION FOR HEARING DE NOVO**

Commercial Union Insurance Companies and American Employers' Insurance Company, parties of record adversely affected by the decision of the Oil Conservation Division in Case 11,515 (Order No. R-10659) herein, hereby apply for a hearing de novo in the case before the full Oil Conservation Commission, pursuant to NMSA, § 70-2-13 (Repl. Pamp. 1995).

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

by: Edmund H. Kendrick  
Edmund H. Kendrick  
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Attorneys for Commercial  
Union Insurance Companies and  
American Employers' Insurance  
Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application For Hearing De Novo was sent by first class mail this 26~~th~~ day of September, 1996, to each of the following persons:

Rand Carroll, Esq.  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

James P. Woosley  
P. O. Drawer 1480  
Cortez, Colorado 81321

  
\_\_\_\_\_  
Edmund H. Kendrick