

## Oil Conservation Commission

November 4, 195

- b. The proposed unit lies wholly within a single governmental section.
  - c. All acreage within the proposed unit may reasonably be presumed productive of gas.
  - d. The length or width of the proposed unit does not exceed 5280 feet.
  - e. Neville G. Penrose, Inc. is operator of all acreage comprising the proposed unit as shown on the attached plan, and by copy of this letter of application, all operators owning interest in the section in which the proposed unit is located and all operators within 500 feet of the proposed unit will be notified of the intent of Neville G. Penrose, Inc., to form the proposed non-standard gas production unit.
5. The approval of this application for a 160-acre non-standard gas production unit will, in the opinion of the applicant, prevent waste, protect cumulative rights and serve the best interest of conservation.

In view of the existence of the facts herein stated and compliance with the provisions of the Rule 5(b) of the Oil Conservation Commission's Order R-210, Neville G. Penrose, Inc., respectfully requests that the Secretary of the Commission approve the above described non-standard gas production unit.

*should be  
Order R- 520  
cf.*

Very truly yours,

NEVILLE G. PENROSE, INC.

R. T. Churchill

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