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March 12, 1991

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VIA HAND DELIVERY

Dennis Bicknell, P.E., Director  
Oil and Gas Conservation Commission  
Logan Tower Building, Suite 380  
1580 Logan Street  
Denver, Colorado 80203

Re: Protest to Application and Amendment to Application  
Filed by J. W. Gibson, Samedan Oil Corporation and  
Robert L. Bayless - Nee Noshe Field, Kiowa County,  
Colorado - Cause No. 338, Docket No. 3-4

Dear Mr. Bicknell:

This firm represents Thomas L. Spring and Hawks Industries, Inc., Protestants, in the above-referenced matter. The Applicants, in their Application and Amendment to Application, seek authorization to drill a well for the drilling and spacing unit consisting of Section 9, Township 19 South, Range 47 West, Kiowa County, Colorado, at a location 300 feet from the East line and 660 feet from the South side of said Section 9. My clients are under the impression that a drilling permit has already been issued for this well.

In view of the fact that the location is the subject of a pending Application and Protest, my clients must insist that the Commission suspend and/or revoke the existing permit for the drilling of this particular well. While the location may not have been the subject of an Application and Protest at the time the permit was granted, the location is certainly the subject of a Protest at this time. It is my understanding that it is Commission policy not to grant permits when there is a dispute regarding location or there is a pending spacing application that would cover the location. I would certainly think that under the circumstances the permit that has been issued should be suspended and/or revoked.

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AVAILABLE

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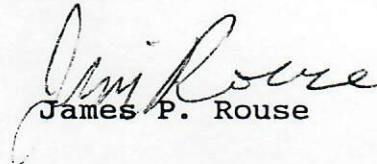
Dennis Bicknell, P.E., Director  
March 12, 1991  
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If there is any problem with our request, please call me immediately.

Very truly yours,

BURNS, WALL, SMITH AND MUELLER, P.C.

BY

  
James P. Rouse

JPR/rm  
SPR-1270\BICKNELL1.LTR

cc: James F. Marquis, Land Manager  
Thomas L. Spring

Mr. Bruce L. Larson  
Hawks, Industries, Inc.

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