State of New Mexico

Energy. Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

DISTRICT II P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410 OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

DISTRICT IV P.O. BOX 2088, SANTA FR. N.M. 87504-2088

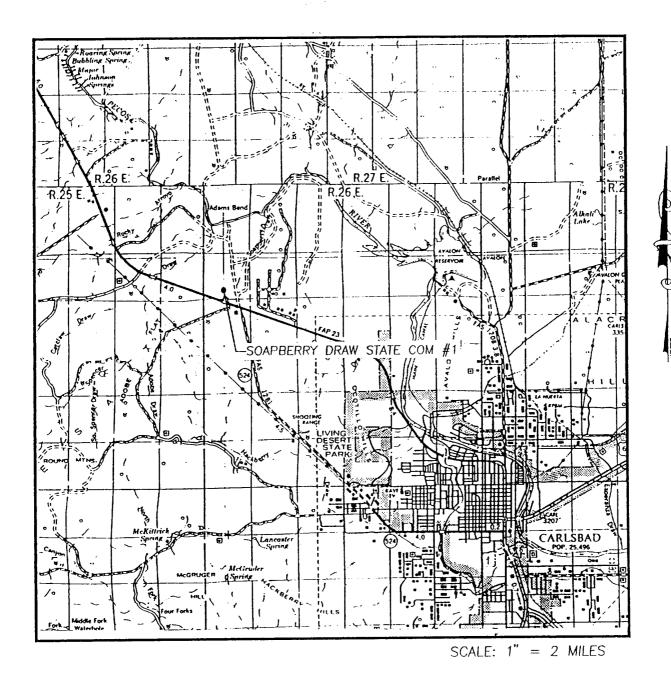
WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number		Pool Code			Pool Name					
			Avalon Morrow				row or Avalo	w or Avalon Strawn		
Property Code			Property Name SOAPBERRY DRAW STATE COM				Well Number			
OGRID No. 2678			Operator Name BONNEVILLE FUELS CORPORATION				Elevation 3277'			
					Surface Loc	ation				
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County	
N	7	21 S	26 E		720	SOUTH	2479	WEST	EDDY	
		· · · · · ·	Bottom	Hole Lo	cation If Diffe	rent From Sur	face	·		
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County	
Dedicated Acre	Joint o	or Infill Con	nsolidation (Code Or	der No.					
320 ac.					Amende	d NSL-4130 (Exception Lo	ocation)		

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

				
LOT B 40.71 AC.	LOT 7 40.74 AC.	LOT 6 41.00 AC.	LOT 5 40.10 AC.	OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief Signature
LOT 9 40.45 AC.	LOT 10 40.60 AC. Acreage Dedicati	LOT 11 40.09 AC.	LOT 12 40.19 AC.	R. A. Schwering, P.E. Printed Name Operations Manager: SE Title 12/5/98 Date
6	Acreage Dealcach	on in Rea naena		SURVEYOR CERTIFICATION
) LOT 3 1 40 AC.				I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervison, and that the same is true and correct to the best of my belief.
/			· -	SEPTEMBER 10, 1998 Date Surveyed CDG Signal are & Seal of Processional, Surveyor
1	2479'			Conla 9 9 17 98
LOT 4 1 40 AC.	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	, , , ,		Certificate No. Box D & EIDSON 3239

VICINITY MAP

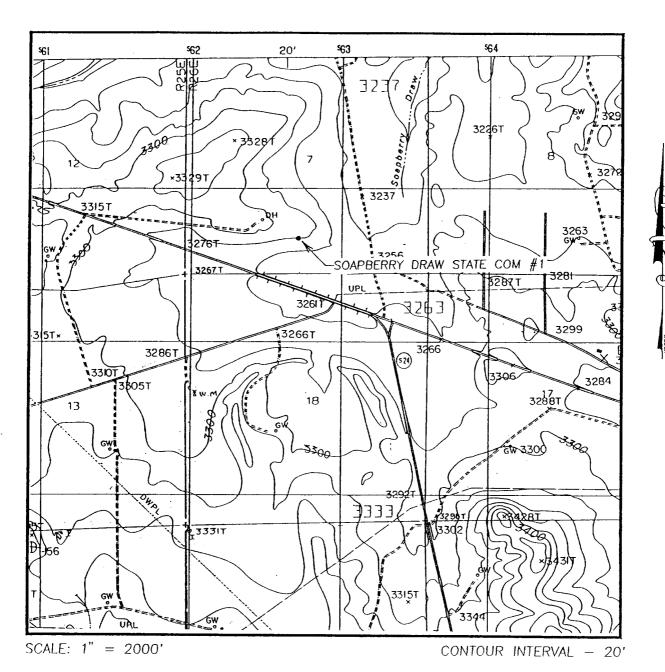


SEC. 7TW	/P. <u>21-S</u> RGE. <u>26-E</u>
SURVEY	N.M.P.M.
COUNTY	EDDY
DESCRIPTION_	720' FSL & 2479' FWL
ELEVATION	3277'

OPERATOR BONNEVILLE FUELS CORPORATION
LEASE SOAPBERRY DRAW STATE COM

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117

LOCATION VERIFICATION MAP



SEC. 7TW	/P. <u>21-S</u> RGE. <u>26-E</u>	
SURVEY	N.M.P.M.	
COUNTY	EDDY	
DESCRIPTION_	720' FSL & 2479' FW	<u>L</u>
ELEVATION	3277'	

CARLSBAD WEST, NM

OPERATOR BONNEVILLE FUELS CORPORATION
LEASE SOAPBERRY DRAW STATE COM
U.S.G.S. TOPOGRAPHIC MAP

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe. New Mexico 87505 (505) 827-7131

September 9, 1998

Bonneville Fuels Corporation Attention: R. A. Schwering 1660 Lincoln - Suite 1800 Denver, Colorado 80264

Telefax No. (303) 863-1558



Administrative Order NSL-4130

Dear Mr. Schwering:

Reference is made to: (i) your application dated September 7, 1998; and, (ii) to the records of the Division in Santa Fe: all concerning Bonneville Fuels Corporation's request to drill the Soapberry "7" State Com. Well No. 1 at an unorthodox gas well location in both the Morrow and Strawn formations 990 feet from the South line and 2630 feet from the East line (Unit K) of Section 7, Township 21 South, Range 26 East, NMPM, Eddy County, New Mexico.

Lots 3 and 4, the E/2 SW/4, and the SE/4 (S/2 equivalent) of Section 7 is to be dedicated to the well in order to form a standard 318.88-acre gas spacing and proration unit in both the Undesignated East Catclaw Draw-Strawn and Undesignated Avalon-Morrow Gas Pools.

This application has been duly filed under the provisions of Rule 104.F of the General Rules and Regulations of the New Mexico Oil Conservation Division ("Division").

By the authority granted me under the provisions of Division General Rule 104.F(2), the above-described unorthodox gas well location for both the Starwn and Morrow intervals is hereby approved.

Sincerely,

Lori Wrotenbery

Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Artesia

New Mexico State Land Office - Santa Fe

REMARKS: This location directly offsets the Catclaw Draw-Morrow Gas Pool to the south and west, and, pursuant to the "General Rules and Regulations for the Prorated Gas Pools of New Mexico/Special Rules and Regulations for the Catclaw Draw-Morrow Gas Pool," as promulgated by Division Order No. R-8170, as amended, requires standard 640-acre gas spacing and proration units with wells to be located no closer than 1650 feet from the outer boundary of a proration unit nor closer than 330 feet from any governmental quarter-quarter section or subdivision inner boundary. However, these special pool rules apply only to that area within the horizontal limits of the Catclaw Draw-Morrow Gas Pool and does not extend outside of these limits a distance of one mile as is the case in most pools [see Ordering Paragraph No. (1) of Division Order No. R-4157-D]. Therefore, the proposed 318.88-acre gas spacing and proration unit within the Undesignated Avalon-Morrow Gas Pool is not effected by these special pool rules.



Bonneville Fuels Corporation

Dec. 2, 1998

Oil Conservation Division of the State of New Mexico

Attn.: Mr. Michael E. Stogner

2040 South Pacheco

Santa Fe, New Mexico 87505

Phone: (505) 827-8185; Fax:

7-1389

Re.

Request For Adminis-

ாoval of a Revised Non-Standard Location

Soapberry Draw State Com. 7-#1

Dear Mr. Stogner,

80.00 Acres

On September 10, 1998 Bonneville Fuels Corporation went to the field to stake a non-standard location for the Soapberry State Com. 7-#1 well at 2630' FEL & 990' FSL, Unit 'J', Section 7, T.21S., R.26E., Eddy County, New Mexico. This proposed location exception was granted by you, at BFC request, but fell on fee owned land (surface only) with parts of the location less than 150' from the fee owner's residence. BFC reviewed the geology and surface owner concerns and re-named and staked the well and location entirely on State surface (fee owner is grazing lessee) with a minimum distance to residence of 400' and a substantial berm being erected to minimize sound impacts. BFC was trying to be a good neighbor to the fee owner AND encounter the geologic resource.

Bonneville Fuels Corporation is the Lessee of Record (100%) of two (2) State of New Mexico Oil and Gas Leases which together constitute the entire south half of Section 7, T.21S., R.26E., NMPM, Eddy County, New Mexico. These leases are as follows:

40.00 Acres Tract No. V0-O-0002 Beneficiary: MI (NMMI)
39.50 Acres Tract No. V0-O-0003 Beneficiary: CS (Commo

Tract No. V0-O-0003

Beneficiary: MI (NMMI) Legals: NE/4 SE/4
Beneficiary: CS (Common Schools) Legals: Lot 3
Beneficiary: CS (Common Schools) Legals: Lot 4
Beneficiary: CS (Common Schools) Legals: E/2 SW/4

80.00 Acres Tract No. V0-O-0003 40.00 Acres Tract No. V0-O-0003

Beneficiary: CS (Common Schools) Legals: W/2 SE/4 Beneficiary: CS (Common Schools) Legals: SE/4 SE/4

Bonneville Fuels is requesting a NON-STANDARD LOCATION at the following footage:

Soapberry State Com. 7-#1

2,479' FWL & 720' FSL, Unit 'K', Section 7,

T.21S., R.26E., NMPM, Eddy County, New Mexico

on this acreage. BFC is requesting this Non-Standard Location for geologic reasons in a pro-ration unit in the Avalon Field in the Morrow and Strawn Fm. Intervals consisting of the 318.88 acres in the south $\frac{1}{2}$ of Section 7.

A Vicinity Map is attached which indicates the presence of two (2) previously drilled statistical dry holes in the south ½ of section 7:

Well Name: Operator: Month Location:
T.D.: Drilled:

Result:

Avalon State #1: David Faske

David Fasken: 10/72: 1400' FSL & 1650' FWL:

Dry Hole.

10,800'

10,800 TXO:

Cal-Mon State #1:

O: 5/83: 990' FSL & 660' FEL:

Non-Commercial

10,877'

Completion.

It is BFC's contention that these two penetrations FAILED to intersect the heart of a potentially productive Morrow Channel incision being, respectively, on the western up-dip and eastern down-dip edges of economic production. BFC requests this Non-Standard location in order to establish economic production in this proration unit. BFC's geologist, Mr. R.J. Kozarek, has attached several log analysis exhibits which demonstrate the necessity of drilling at the requested location in order to intersect a productive interval in the Morrow at the most economic (probable) location which still allows us to address landowner concerns.

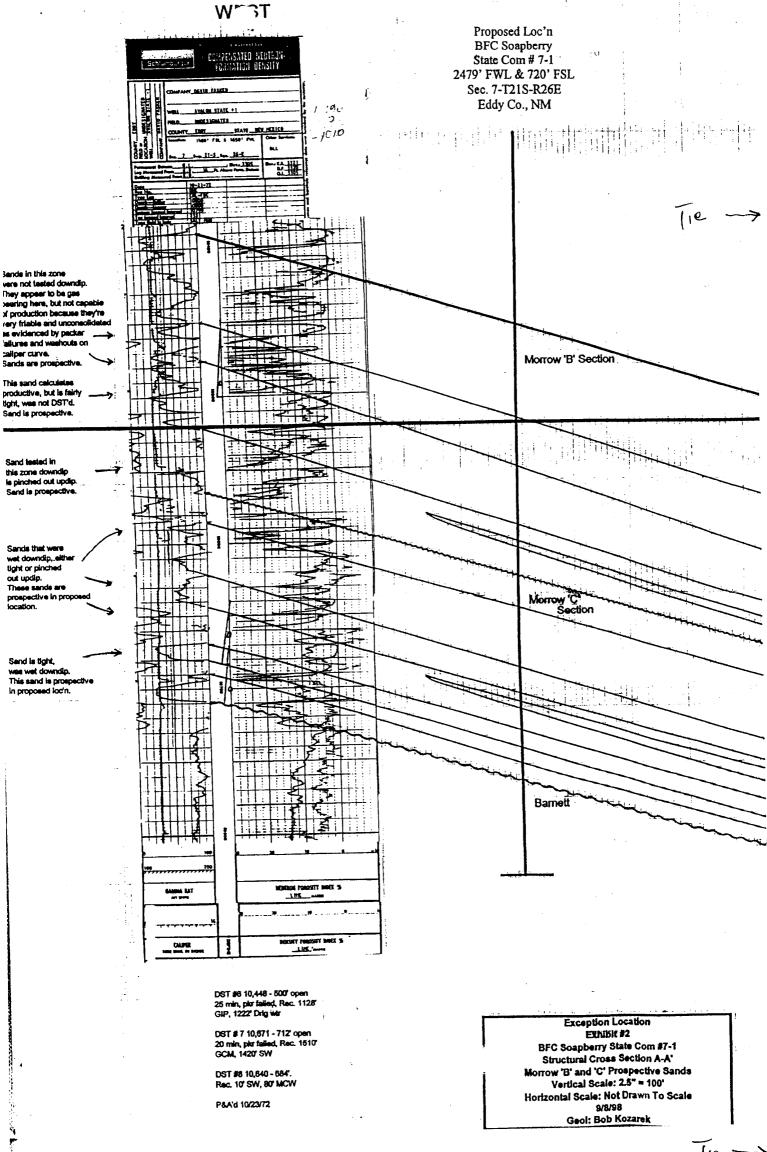
Please grant this Administrative Request as soon as possible - if it is acceptable. This material is being faxed for your immediate consideration. A hard copy will be mailed immediately. **Mike, I would really appreciate your immediate attention to this matter as I need to file the State Permit and commence location construction within the next 2 weeks.** Call me if you have any questions. I have also attached our land settlement with the fee owner if this will aid in granting this exception. Please respond to this request by fax ASAP.

Sincerely Yours,

BONNEYLLE FUELS CORPORATION

R.A. Schwering, P.E. Operations Manager: SE NM

Attachments
Cc: Well File



Exception Location EXMISIT #2

BFC Soapherry State Com #7-1 Structural Cross Section A-A' Morrow 'B' and 'C' Prospective Sands Vertical Scale: 2.5" = 100' Horizontal Scale: Not Drawn To Scale 9/8/98 Geol: Bob Kozarek

-Tie

