

1911-12
1912-13
1913-14

This was to go as approval. Gary Carlson said we better attached. Had talked to Mike Stogner and we agree there is some question about making an exception to Buffer zone. R111-P does not provide one. However, this loc is in barren area on BLM map and the buffer extends west from #11 well. This is to "prevent waste" ~~west~~ east of #11 well.

Approved We acknowledge receipt of Form C101 and C102 concerned with Enron's proposal to drill the James Ranch Unit #18 well. The Commissioner of Public Lands approves this location. However, you are reminded that the location is within the buffer zone bordering an LMR filed by Western Ag-Miners and subject to challenge under OGD Rule R111-P.

The Commissioner feels that an exception is justified, or reasoning being:

1. The James Ranch #11 did drill through the ore zone inside the designated LMR boundary.
2. The eastward limit of mining would be determined by the James Ranch #11, not by a location to the east.
3. Applying a 45° cone of subsidence factor of 1300' depth to ore, the eastward limit of mining would be outside the western boundary of Section 36.
4. Since the limit is established by the J.R. #11, resources to the east, even though within the buffer zone, would be wasted.
5. To prevent waste, the Commissioner believes it is in the best interest of the beneficiaries to grant an exception in this case.