

NEW MEXICO ENERGY, MINERALS and Market NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

> Amoco Production Company San Juan Business Unit 501 West Lake Park Boulevard Houston, Texas 77079-3092

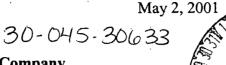
Attention: Mary Corley

Re: Administrative application of Amoco Production Company for an exception to the well location requirements provided within the "Special Rules and Regulations for the Basin-Dakota Pool," as promulgated by Division Order No. R-10987, as amended, by Division Orders No. R-10987-B and R-10987-B (1), for the Fields Well No. 4-M to be drilled at an unorthodox gas well location 2195 feet from the South line and 1390 feet from the East line (Unit J) of Section 28, Township 32 North, Range 11 West, NMPM, San Juan County, New Mexico, within a standard 320-acre stand-up gas spacing and proration unit comprising the E/2 of Section 28.

Dear Ms. Corley:

I, along with the Division's Aztec district office, have reviewed the subject application and the records of the New Mexico Oil Conservation Division ("Division") concerning this matter, please be advised that:

- with the inception of Division Order No. R-10987-B, issued in Case No. 12290 and dated June 30, 2000, as amended by Division Order No. R-10987-B (1), dated August 10, 2000, most operators have been given an additional 28.10 acres on the surface within a single quarter section to locate Dakota gas wells at a location considered to be standard;
- (2) in instances where a single wellbore is to be utilized in more then one producing horizon, the operator is expected to drill that well at a location considered to be standard for all intended zones and not just one of the intended formations with the expectation that this is reason enough for approval;
- (3) the reason for locating this infill well is neither based on topography or geology and therefore does not qualify for administrative approval; and
- (4) from the information provided, there appear to be areas within the 120 acres comprising the N/2 SE/4 and SE/4 SE/4 of Section 28 that this well can be drilled that satisfy the minimum setback requirements for a dually completed Dakota/third infill Mesaverde gas well.



CON. DR dist. 9

Lori Wrotenbery Director Oil Conservation Division

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	[E]	_ For all of the ab	ove, Proof of Notific	ation or Publicatic	n is Attached, and/or,							
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31 1	INFORMAT	TION / DATA SUB	MITTED IS COM	PLETE - Statemer	t of Understanding							

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note:/Statement must be completed by an individual with supervisory capacity.

j.

Ëį. Sr. Regulatory Analyst Title 04/10/2001 Mary Corley Print or Type Name Signature Date

San Juan Business Unit Amoco Production Company A Part of the BP Amoco Group 501 WestLake Park Blvd. Houston, TX 77079-3092

Phone: 281-366-4491

April 10, 2001

DD

Mr. Michael Stogner New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Application For Non-Standard Well Location Fields Well No. 4M 2195' FSL, 1390' FEL, Section 28-T32N-R11W Basin Dakota Gas Pool San Juan County, New Mexico

Amoco Production Company hereby requests administrative approval for an non-standard well location for our Fields well no. 4M to be drilled and completed in both the Basin Dakota and the Blanco Mesaverde Gas Pools and downhole commingled. The subject well will require a non-standard location exception for the Basin Dakota completion as the proposed location does not conform to the Dakota location requirements that stipulate that a well be located no closer than 660' to any outer boundary of the quarter section on which the well is located. The proposed well location is 445' from the north line of the quarter section as shown on the attached Form C-102.

We respectfully request than administrative approval be granted for this Dakota location as stated above our intention is to complete in both the Dakota and Mesaverde Pools and downhole commingle. An application will be made to commingle the Mesaverde and Dakota via a separate application. The well is outside the well location window for the Dakota by being too close to the interior quarter section line thereby crowding our own spacing unit. Amoco is the only affected party.

Additionally, we offer that the Dakota is not a viable stand-alone project. The Mesaverde in the area has been highly productive and poses some drainage concerns, particularly if the location is too close to current producers. By completing the well at the proposed location it conforms to Mesaverde spacing requirements, prevents waste in the Mesaverde, minimizes interference with other Mesaverde wells and allows maximum drainage and recovery of the Mesaverde resource.

bp



Also attached for your reference is a 9 Section plat with the subject well and surrounding wells identified, a portion of a topographic map with the well identified, and a map indicating directions to the well location.

Your attention to this matter is greatly appreciated. Should you have any questions concerning this application please do not hesitate to call me at 281-366-4491.

Sincerely,

Mary Corley

Sr. Regulatory Analyst corleyml@bp.com

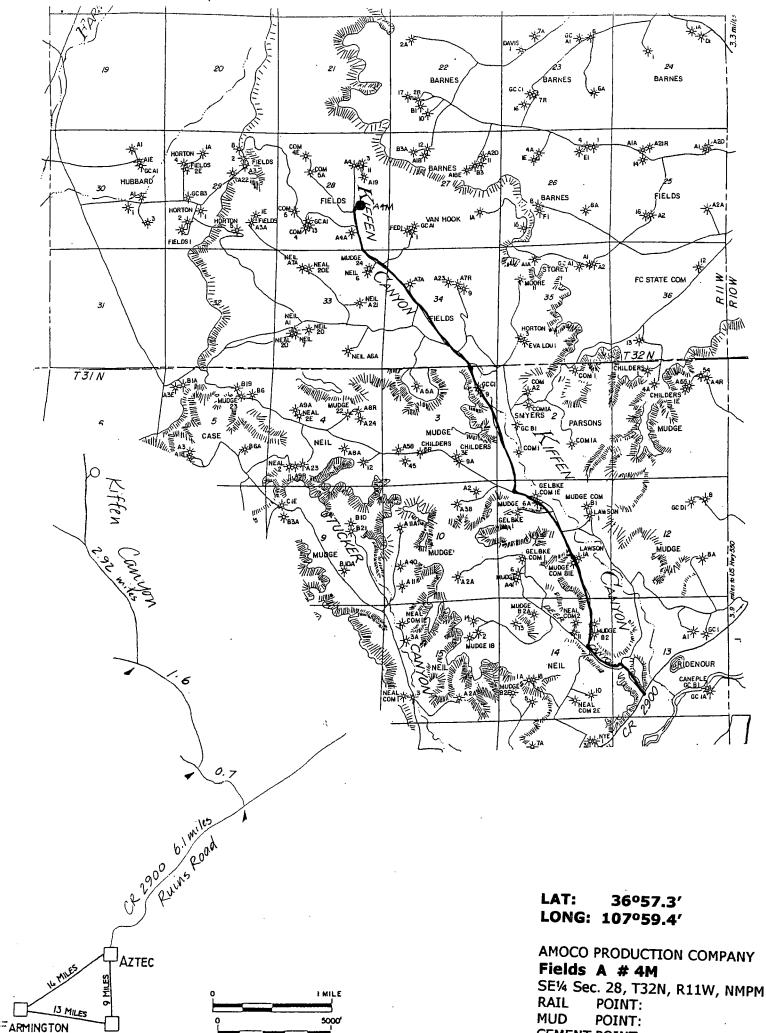
cc: Frank Chavez, Supervisor NMOCD District III 1000 Rio Brazos Road Aztec, NM 87410 District I PO Box 1980, Hobbs NM 88241-1980 District II PO Drawer KK, Artesia, NM 87211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088 State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-102 Revised February 21, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

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