



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 17, 1997

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OIL CON. DIV.
DIST. 3

Burlington Resources
3535 East 30th Street
Farmington, New Mexico 87499-4289
Attention: Peggy Bradfield

Administrative Order TX-266

Dear Mr. Prichard:

Reference is made to your request for an exception to the tubing setting requirements as contained in Division Rule 107 (j) for the below-named wells.

Pursuant to the authority granted me by Rule 107 (d) (4), you are hereby authorized to make tubingless completions in the following wells:

Well Name and Number:

Ballard #2	Ballard Pictured Cliffs	P 10-26-09	30-045-05902
Ballard #5	Ballard Pictured Cliffs	P 14-26-09	30-045-05823
Crandell #1	Ballard Pictured Cliffs	M 11-26-09	30-045-05909
Douthit #3	W. Kutz Pictured Cliffs	P 26-27-11	30-045-06213
Harrington #3	S. Blanco Pictured Cliffs	P 31-27-07	30-045-06848
Hubbell SRC #2	Fulcher Kutz Pictured Cliffs	I 30-28-10	30-045-07141
Huerfanito Unit #64	Ballard Pictured Cliffs	D 12-26-09	30-045-05962
Huerfanito Unit #69	Ballard Pictured Cliffs	D 10-26-09	30-045-05968
Luthy A #1	S. Blanco Pictured Cliffs	H 01-26-08	30-045-06040
McManus #1	Ballard Pictured Cliffs	P 30-26-08	30-045-05654
McManus #9	Ballard Pictured Cliffs	M 33-26-08	30-045-05604
Newman A #6	Fulcher Kutz Pictured Cliffs	J 19-28-10	30-045-07312
Quitau #1	Ballard Pictured Cliffs	D 03-25-08	30-045-05565
Quitau #2	Ballard Pictured Cliffs	F 11-25-08	30-045-05500
Quitau #3	Ballard Pictured Cliffs	P 11-25-08	30-045-05469
Quitau #4	Ballard Pictured Cliffs	O 03-25-08	30-045-05532
Quitau #5	Ballard Pictured Cliffs	M 03-25-08	30-045-05536
Turner Hughes #10	S. Blanco Pictured Cliffs	B 11-27-08 9	30-045-06710
White Kutz #3	Fulcher Kutz Pictured Cliffs	B 20-28-10	30-045-07364
Wilson A #1	Ballard Pictured Cliffs	D 32-26-08	30-045-05630
Wilson A #2	Ballard Pictured Cliffs	K 32-26-08	30-045-05611

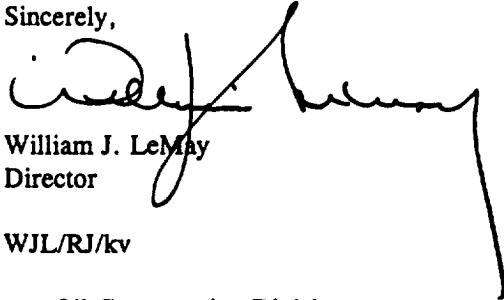
Conditions:

The operator shall place adequate cement prior to running 3 1/2" casing, or alternatively at the time of plugging and abandonment to insure that the Ojo Alamo Formation is completely sealed off with cement. The methodology to be employed shall be approved by the division's Aztec office prior to commencement of any remedial work.

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The Division reserves the right to rescind this authority in the event that waste appears to be resulting therefrom.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay", is written over the printed name and title.

William J. LeMay
Director

WJL/RJ/kv

cc: Oil Conservation Division - Aztec

BURLINGTON RESOURCES

SAN JUAN DIVISION

March 3, 1997

New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Att: Mr. Roy Johnson

Dear Roy:

As we discussed February 27 by phone, this letter serves as application for variance to Rule 107 Sections J. We intend to workover and drill additional hole in the following wells in the Pictured Cliffs formation, run 3 1/2" casing and cement, and run no tubing.

Ballard #2	Ballard Pictured Cliffs	P 10-26-09	30-045-05902 ✓
Ballard #5	Ballard Pictured Cliffs	P 14-26-09	30-045-05823
Crandell #1	Ballard Pictured Cliffs	M 11-26-09	30-045-05909
Deuthit #3	W.Kutz Pictured Cliffs	P 26-27-11	30-045-06213 ✓
OK - Harrington #3	S.Blanco Pictured Cliffs	P 31-27-07	30-045-06848 ✓
Hubbell SRC #2	Fulcher Kutz Pictured Cliffs	I 30-28-10	30-045-07141
Huerfanito Unit #64	Ballard Pictured Cliffs	D 12-26-09	30-045-05962
Huerfanito Unit #69	Ballard Pictured Cliffs	D 10-26-09	30-045-05968
OK - Luthy A #1	S.Blanco Pictured Cliffs	H 01-26-08	30-045-06040 ✓
Luthy #2	S.Blanco Pictured Cliffs	K 01-26-08	30-045-06025 ✓
McManus #1	Ballard Pictured Cliffs	P 30-26-08	30-045-05654
McManus #9	Ballard Pictured Cliffs	M 33-26-08	30-045-05604 ✓
Newman A #6	Fulcher Kutz Pictured Cliffs	J 19-28-10	30-045-07312 ✓
Quitau #1	Ballard Pictured Cliffs	D 03-25-08	30-045-05565 ✓
Quitau #2	Ballard Pictured Cliffs	F 11-25-08	30-045-05500 ✓
Quitau #3	Ballard Pictured Cliffs	P 11-25-08	30-045-05469 ✓
Quitau #4	Ballard Pictured Cliffs	O 03-25-08	30-045-05532
Quitau #5	Ballard Pictured Cliffs	M 03-25-08	30-045-05536
Turner Hughes #10	S.Blanco Pictured Cliffs	B 11-27-08	30-045-06710 ✓
White Kutz #3	Fulcher Kutz Pictured Cliffs	B 20-28-10	30-045-07364 ✓
Wilson A #1	Ballard Pictured Cliffs	D 32-26-08	30-045-05630
Wilson A #2	Ballard Pictured Cliffs	K 32-26-08	30-045-05611 ✓

These tubingless completions are desirable as they allow Burlington to economically produce reserves from the tight, low pressure Pictured Cliffs formation. Significant cost savings are realized using this method. The 3 1/2" casing string will allow the wells to produce at a higher rate than can be realized through smaller tubulars, and also carry less risk during any subsequent workover operations.

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OIL CON. DIV.
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Page Two
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Tubingless Completion Application

All the listed wells meet the following criteria:

- are in proven fields
- are less than 5000' total depth
- do not have corrosive or pressure problems
- are not dual completions
- will not produce any liquids or condensate (dry gas only)

Attached is a copy of the C102 well location plat and wellbore schematic for each well. Please let me know if you require any further information for these wells.

Sincerely,

BURLINGTON RESOURCES

A handwritten signature in cursive script, appearing to read "Peggy Bradfield".

Peggy Bradfield
Regulatory/Compliance Administrator

xc: NMOCD Aztec District Office

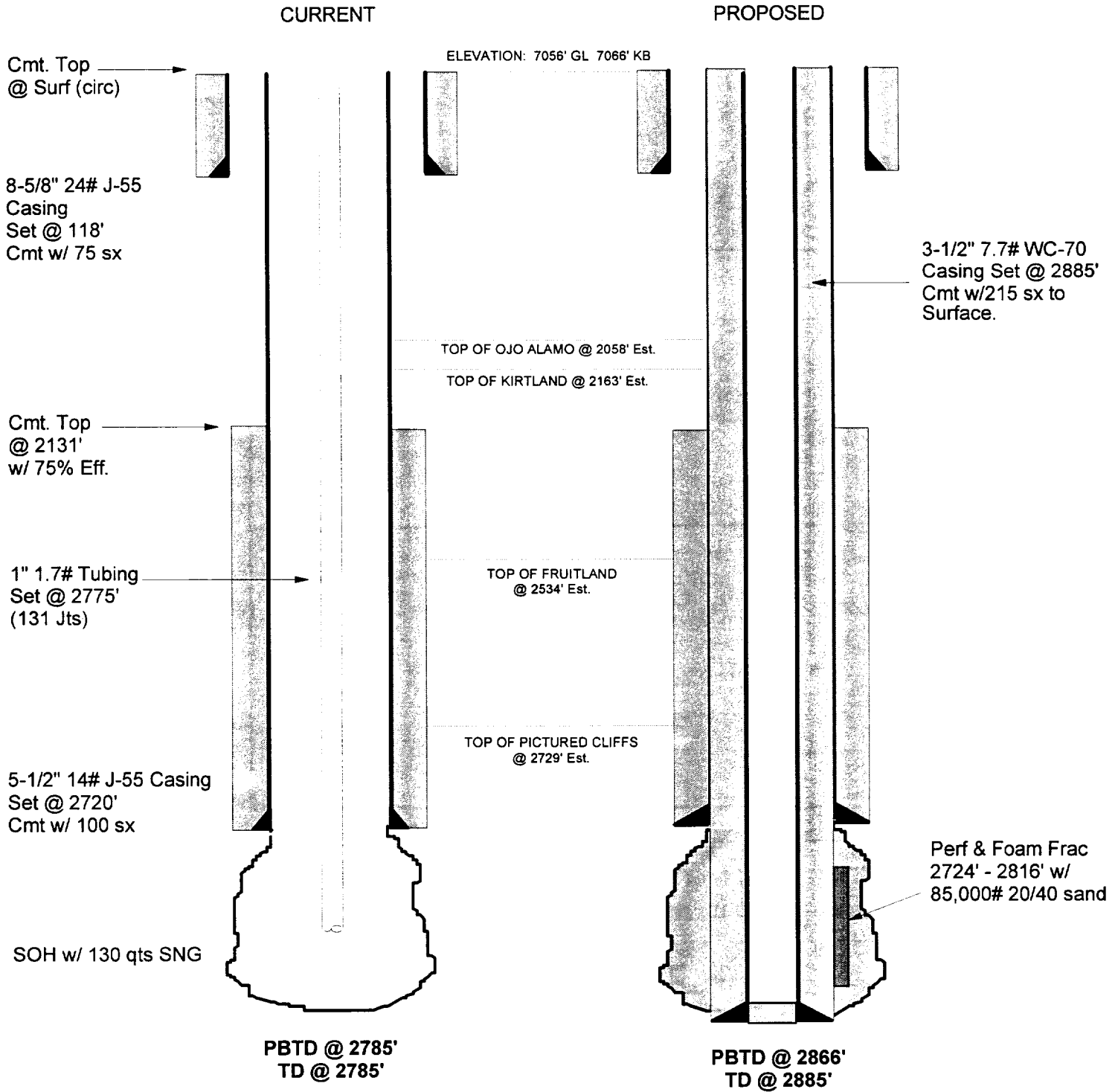
Quitau #3

Section 11P, T-25-N, R-8-W
San Juan County, NM

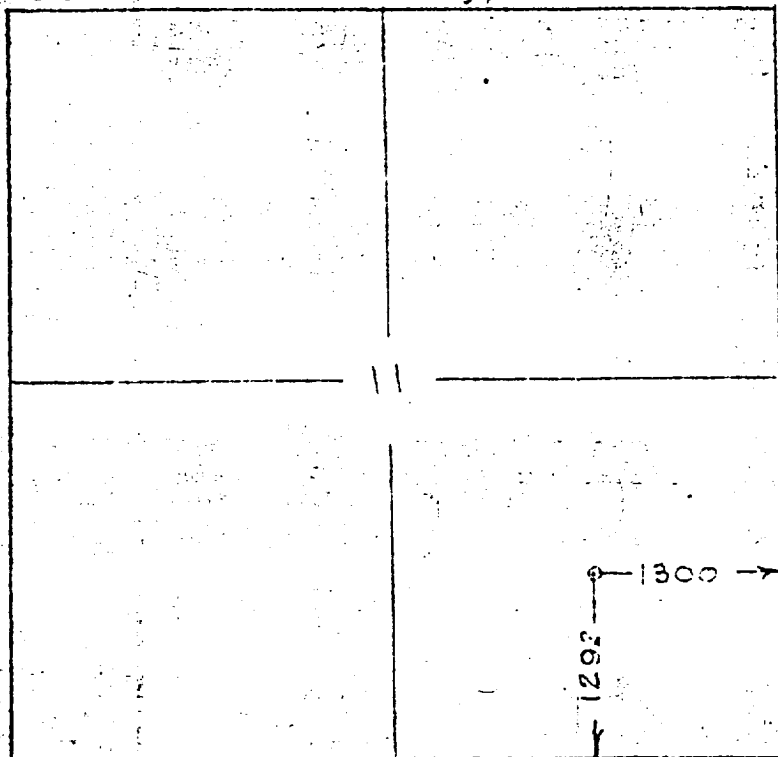
BALLARD PICTURED CLIFFS WELLBORE SCHEMATIC

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OIL CON. DIV.
DEPT. 8



COMPANY - Benson & Martin
LEASE - Quitzou Well No 3
SECTION - II T25N, R8W NMPM
LOCATION - 1292' from south line
1300' from east line
San Juan County, New Mexico



This is to certify that the above
plat was prepared from field notes
of actual surveys made by me
and are true & correct to the best
of my knowledge & belief

Robert L. Maddox Jr.
Robert L. Maddox Jr.
Registered Professional
Engineer & Land Surveyor
N. Mex. Reg. 1426

Surveyed 9-19-54