

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

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

June 7, 1999

JUN 1 0 1999

OUL GORL DOWN

Phillips Petroleum Company 5525 Highway 64 – NBU 3004 Farmington, New Mexico 87401 Attention: S. Scott Prather

Administrative Order NSL-4307

Dear Mr. Prather:

Reference is made to your application dated May 14, 1999 for an exception to the well location requirements provided within the "Special Rules and Regulations for the Basin-Dakota Pool," as promulgated by New Mexico Oil Conservation Division ("Division") Order No. R-10987. The W/2 equivalent of Section 3, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico is to be dedicated to the proposed well in order to form a standard 320-acre, more or less, stand-up gas spacing and proration unit for the Basin-Dakota Pool.

The application has been duly filed under the provisions of Division Rules 104.F and 605.B.

By the authority granted me under the provisions of Division Rule 104.F(2), the following described well to be drilled at an unorthodox gas well location in Section 3 is hereby approved:

San Juan "29-6" Unit Well No. 29-B 755' FNL & 1380' FWL (Unit C) (API No. 30-039-26179).

Further, the aforementioned well and spacing unit will be subject to all existing rules, regulations, policies, and procedures applicable to prorated gas pools in Northwest, New Mexico.

Sincerely,

Lori Wrotenbery

Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Aztec

U. S. Bureau of Land Management - Farmington



FARMINGTON, NEW MEXICO 8740 5525 HWY. 64 NBU 3004

May 14, 1999

DECEIVED MAY 1 9 1999 OIL COM. DIV.

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

Attn: Mr. Michael Stogner

RE: REQUEST FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION

SAN JUAN 29-6 UNIT #29B WELL

NW/4 SECTION 3-29N-6W

RIO ARRIBA COUNTY, NEW MEXICO

PHILLIPS CONTRACT C40453

Dear Mr. Stogner:

Phillips Petroleum Company (Phillips) as Operator of the captioned well, respectfully requests administrative approval of an unorthodox well location for the said well.

Phillips proposes to drill the San Juan 29-6 Unit #29B well at a location of 755' FNL & 1380' FWL of Section 3-29N-6W, Rio Arriba County, New Mexico. This well will be a commingled well located in the Basin Dakota and Blanco Mesaverde Pools and will have the W/2 of Section 3 designated as the drillblock for the Mesaverde and as the drillblock for the Dakota. This is an orthodox location for the Mesaverde, (as per Order No. R-10987-A) and is an 80 acre infill well for the Mesaverde Pool, however, it is not an orthodox location for the Dakota Pool as currently established.

In this particular unit, the Mesaverde has been developed on the optional 160 acre basis. It is unlikely that a Dakota well could be drilled as a stand-alone well on an economic basis. The economics are improved through the investment savings realized by drilling the well as a Dakota/Mesaverde commingled well. Since the orthodox locations for the Dakota already have existing Mesaverde wells on them, we are precluded from drilling commingled wells at those locations. The most viable alternative to recover Dakota reserves is to drill the 80 acre Mesaverde infill wells as commingled wells, thus necessitating our request. Additionally, this creates less surface disturbance, which is an increasing concern of the BLM and Fee surface owners.

For your benefit in reviewing this request, we are providing the following:

- 1. Form C-102
- 2. A topographical plat of the area
- 3. A nine section plat exhibiting offset operators
- 4. Copies of exhibits presented at our March 18, 1999 hearing for downhole commingling in the San Juan 29-6 Unit (Case No. 12136, currently pending with Mr. Catanach)

This drill block is located within the confines of the San Juan 29-6 Unit. The offset operators have been furnished with 3 copies of this correspondence by certified mail and are requested to furnish your office with a Waiver of Objections, keep one copy for their records and return one copy to our office.

Unorthodox Well Location San Juan 29-6 Unit #29B Well May 14, 1999 Page 2

We thank you for your considerate attention to this request and should you need additional information or clarification, please do not hesitate to contact the undersigned.

Very truly yours,

S. Scott Prather, CPL
Senior Landman
San Juan Basin
(505) 599-3410

cc: J. L. Mathis (r) C40453
Emie Busch – OCD, Aztec
Offset Owners

hereby waives objection to Phillips Petroleum Company's application for a Dakota unorthodox location for the San Juan 29-6 Unit #29B well as proposed above.

Date:_____

District I Pt) Not 1988, Hobbs, NM 20241-1988 District II BII South First, Arteria, NM 20218 District III 1888 Rio Brazon Rd., Antec, NM 27416 District IV

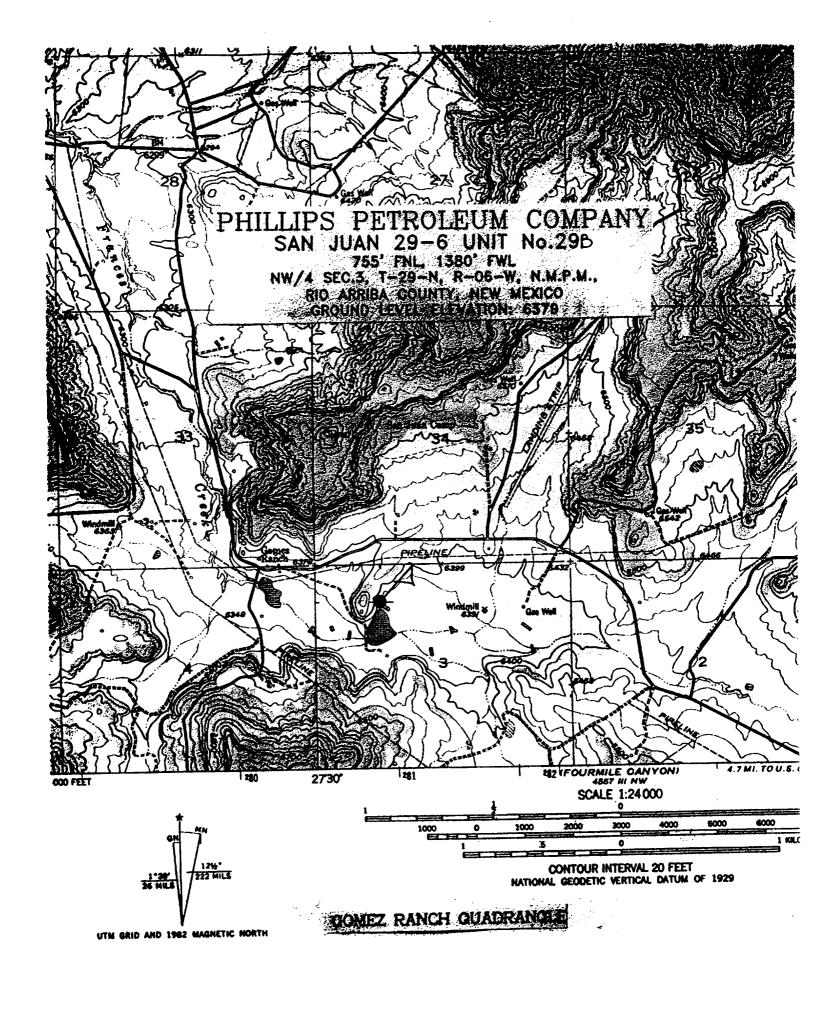
State of New Mexico Kacryy, Macrain & Natural Resources Department

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

Form C-102
Revised October 18, 1994
Instructions on back

Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

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OFFSET OWNERSHIP PHILLIPS PETROLEUM COMPANY SAN JUAN 29-6 UNIT #29B WELL

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R-6-W

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KAN ACHEFEE
KAN POINT LOOKOUT

KAN CLETHOUSE
KAN MENETE
KAN MENETE
KAN POINT LOOKOUT

Mesaverde Participating Area
37th expansion Eff. 11/1/62

PHILLIPS PETR. CO.

SAN JUAN 29-6 UNIT

March 4, 1999

J. Hopkins

DRILLING AND COMPLETION COSTS CAPITAL EXPENSES (M\$)

MESAVERDE

DAKOTA

SINGLE COMPLETION

	TANGIBLE	INTANGIBLE	TOTAL		TANGIBLE	INTANGIBLE	TOTAL
DRILL & COMPLETE			444.6	DRILL & COMPLETE	119.1	362.2	481.3
FACILITIES		16.4	39.0 FACILITIES	22.6	16.4	39.0	
TOTAL	127.8	355.8	483.6	TOTAL	L 141.7	378.6	520.3
		es (Dakota + Mesaverde)	1003.9				

DUAL COMPLETION

DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 74.5 22.6 97.1	 	DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 80.6 22.6 103.2	16.4	TOTAL 442.6 39.0 481.6
	-					

Dually Completed (Dakota + Mesaverde) 925.4

COMMINGLE COMPLETION

	TANGIBLE	INTANGIBLE	TOTAL		TANGIBLE	INTANGIBLE	TOTAL
DRILL & COMPLETE	51.7	284.5	336.2	DRILL & COMPLETE	69.7	280.3	350 .0
FACILITIES	11.3	8.2	19.5	FACILITIES	11.3	8.2	19 .5
TOTAL	63.0		355.7	TOTAL	81.0	288.5	369 .5

Commingled Completion (Dakota + Mesaverde) 725.2

