

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



OIL CON. DIV. DIST. 3

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

Administrative Order NSL-4306

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 1, 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 1 is hereby approved:

San Juan "29-6" Unit Well No. 8-B 1305' FNL & 660' FWL (Lot 8/Unit D). - 1

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



May 14, 1999

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 #8B WELL.

NW/4 SECTION 1-29N-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 #8B well at a location of 1305' FNL & 660' FWL of Section 1-29N-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 1 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 mall 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 #8B Well May 14, 1999 Page 2

By:_____

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 #8B well as proposed above.

Date: ______

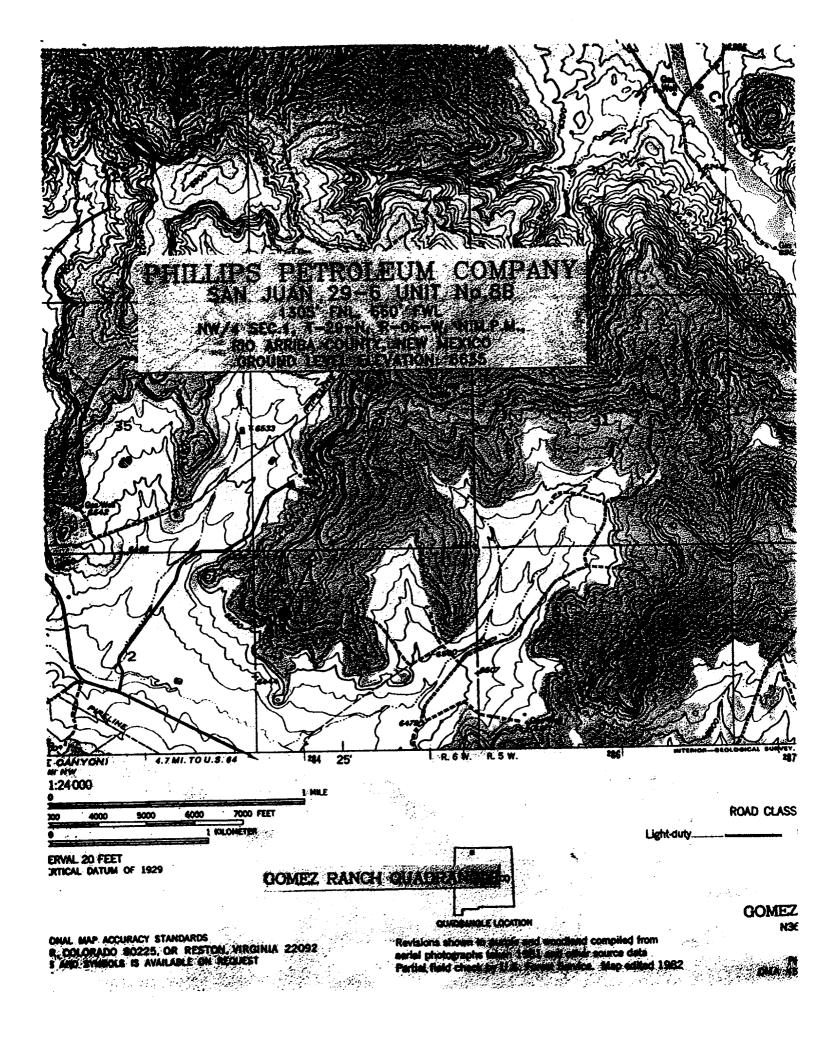
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State of New Mexico Kacryy, Minerals & Natural Remusees the

Form C-102 Revised October 18, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies

OIL CONSERVATION DIVISION

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OFFSET OWNERSHIP PHILLIPS PETROLEUM COMPANY SAN JUAN 29-6 UNIT #8B WELL

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T30N-R5W

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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

DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 105.2 22.6 127.8	16.4	TOTAL 444.6 39.0 483.6	DRILL & COMPLETE FACILITIES TOTAL			TOTAL 481.3 39.0 520.3
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Two Singles (Dakota + Mesaverde) 1003.9

DUAL COMPLETION

DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 74.5 22.6 97.1	 TOTAL 404.8 39.0 443.8	DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 80.6 22.6 103.2	INTANGIBLE 362.0 16.4 378.4	TOTAL 442.6 39.0 481.6

Dually Completed (Dakota + Mesaverde) 925.4

COMMINGLE COMPLETION

DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 51.7 11.3 63.0		TOTAL 336.2 19.5 355.7	DRILL & COMPLETE FACILITIES TOTAL	TANGIBLE 69.7 11.3 81.0	INTANGIBLE 280.3 8.2 288.5	TOTAL 350.0 19.5 369.5
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Commingled Completion (Dakota + Mesaverde) 725.2

