

December 22, 1999

Oil Conservation Division State of New Mexico 2040 South Pacheco Santa Fe, New Mexico 87505 DIL COM. DIV.

Attn: Ms. Lori Wrotenberry

RE: REQUEST FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION

SAN JUAN 29-5 UNIT #70M WELL

SE/4 SECTION 28-29N-5W

RIO ARRIBA COUNTY, NEW MEXICO

PHILLIPS CONTRACT C40452

Ladies and Gentlemen:

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 29-5 Unit #70M well at a location of 280' FSL & 2355' FEL of Section 28-29N-5W, 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 E/2 of Section 28 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 infill well for the Mesaverde Pool, however, it is not an orthodox location for the Dakota Pool as currently established.

The Mesaverde is being developed on the optional 160 acre basis. This well is located on fee lands. The surface owner (Mr. Don Candelaria) met with our representative and specifically requested that this location be used to minimize damage to his existing ranching operations. 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. The most viable alternative to recover Dakota reserves is to drill the Mesaverde infill wells as commingled wells, thus necessitating our request. Additionally, this creates less surface disturbance, and accommodates the Fee surface owners' request.

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

- 1. Form C-102 (and accompanying information)
- 2. A topographical plat of the area
- A nine section plat exhibiting offset operators

This drill block is located within the confines of the San Juan 29-5 Unit and is completely surrounded by drillblocks operated by Phillips. Per the District OCD office in Aztec, it is our understanding that the 20 day notice period can be waived due to Phillips operating all offsetting drillblocks. We respectfully ask that if possible, the waiting period be waived and this request expedited.

Unorthodox Well Location San Juan 29-5 Unit #70M Well December 22, 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 sontact the undersigned.

Very truly yours,

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

cc: J. L. Mathis (r) C40452 Frank Chavez – OCD, Aztec Offset Owners

Ondot Owners

District L Pt) Ros 1980, Hobbs, NM 88241-1980 District II 811 South First, Artesia, NM 88210 District III 1000 Rio Bruzon Rd., Aztec, NM 87410 District IV

State of New Mexico Energy, Minerals & Natural Resources Department

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

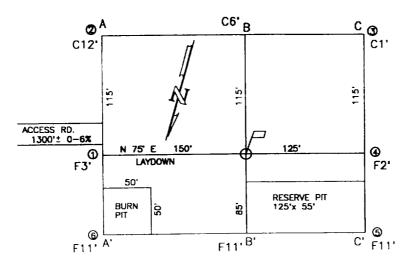
Submit to Appropriate District Office

State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

140 South Pachee	o, Santa F				~	TI () \	LAND ACD	EACE DE	EDIC.	ል ፕ	ION PI		AMI	ENDED REPORT
'API Number						ol Code		REAGE DEDICATION PLAT Pool Name						
⁴ Property Code			SAN JUAN 29				Name -5 UNIT					* Well Number 70M		
'OGRID No.				Operate PHILLIPS PETRO				r Name				† Elevation 6650†		
							¹⁰ Surface	Location				·		
UL or lot no. Section		Township		Range		Idn	Feet from the	North/South line		Feet from the		East/West line		County RIO ARRIBA
0	28	29N		5 W			280	SOUTH Different	Fron		355'	EAST		IKIU AKKIBA
				" Bott			e Location I	1				East/West	line	County
UL or lot no.	Section	Townshi	P	Range	Lot	Ida	Feet from the	North/South	nue	Feet from the		EARL/West trace		County
12 Dedicated Acr	es '' Joint	or Infill	14 C	onsolidatio	n Coc	le "C	Order No.							
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16		S89)°52	2'E		528	1.32'				I hereby cert	nify that the in	formation	RTIFICATION on contained herein u y knowledge and belief
5280.00				Sec	tio	n 28				5280.00	Printed Na Title Date	me		
N00°01'E										NO0°02'E	I hereby ce was plotted or under m	rify that the v I from field no y supervision the best of my	vell local nes of ac , and tha belief.	RTIFICATION sion shown on this plat ruul surveys made by n at the same is true and
		gs	39°'	51 ' E		280. 1-0	23 <u></u>	55*			Ecrisicas:		1139	HOVE HOLE



A-A' ELEVATION	C/L								
6670									
6660	Williams.								
6650									
6640									
6630									

8-B,	C/L							
6670								
6660								
6650	William A A							
6640								
6630								

C-C'	C/L								
6670									
6660									
6650									
6640									
6630									

COMPANY: PHILLIPS PETROLEUM CO.

LEASE: SAN JUAN 29-5 UNIT No. 70M

FOOTAGE: 280 FSL 2355 FEL UNIT O

SEC. 28 TWN. 29 N RNG. 5 W N.M.P.M.

COUNTY: RIO ARRIBA STATE: N.M.

ELEVATION: 6650

LATITUDE: 36-41-24

LONGITUDE: 107-21-40

PHILLIPS PETROLEUM CO.

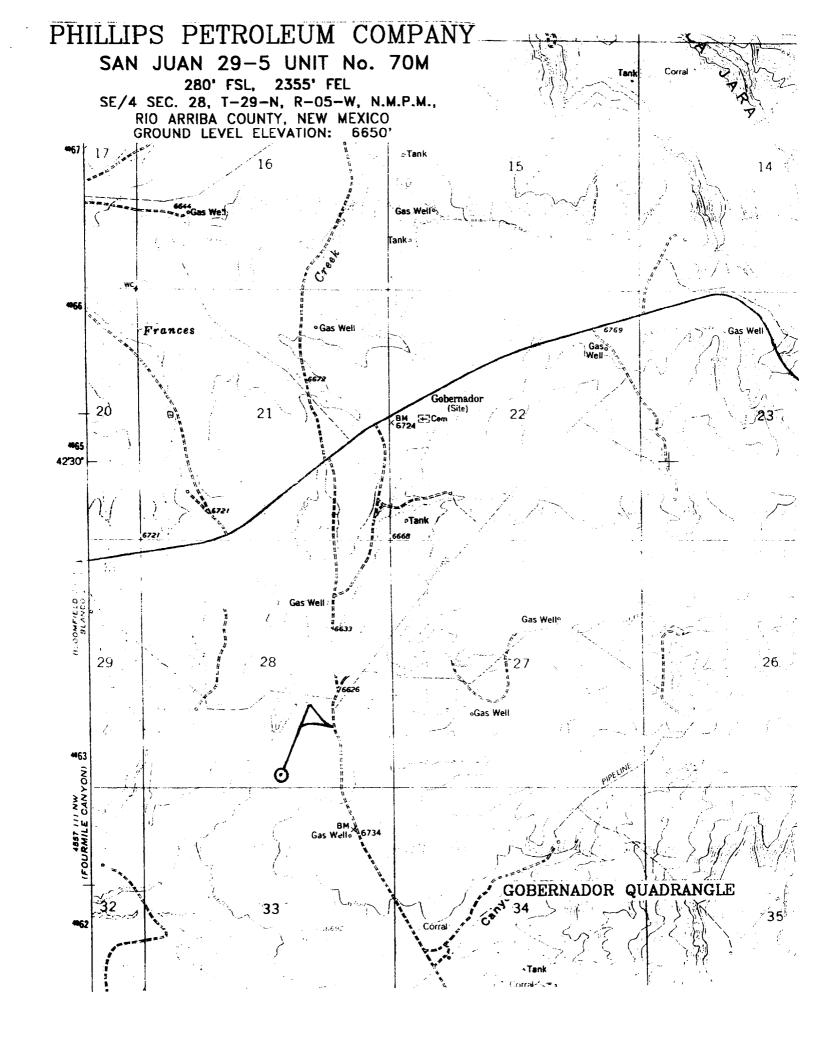
FARMINGTON, NEW MEXICO

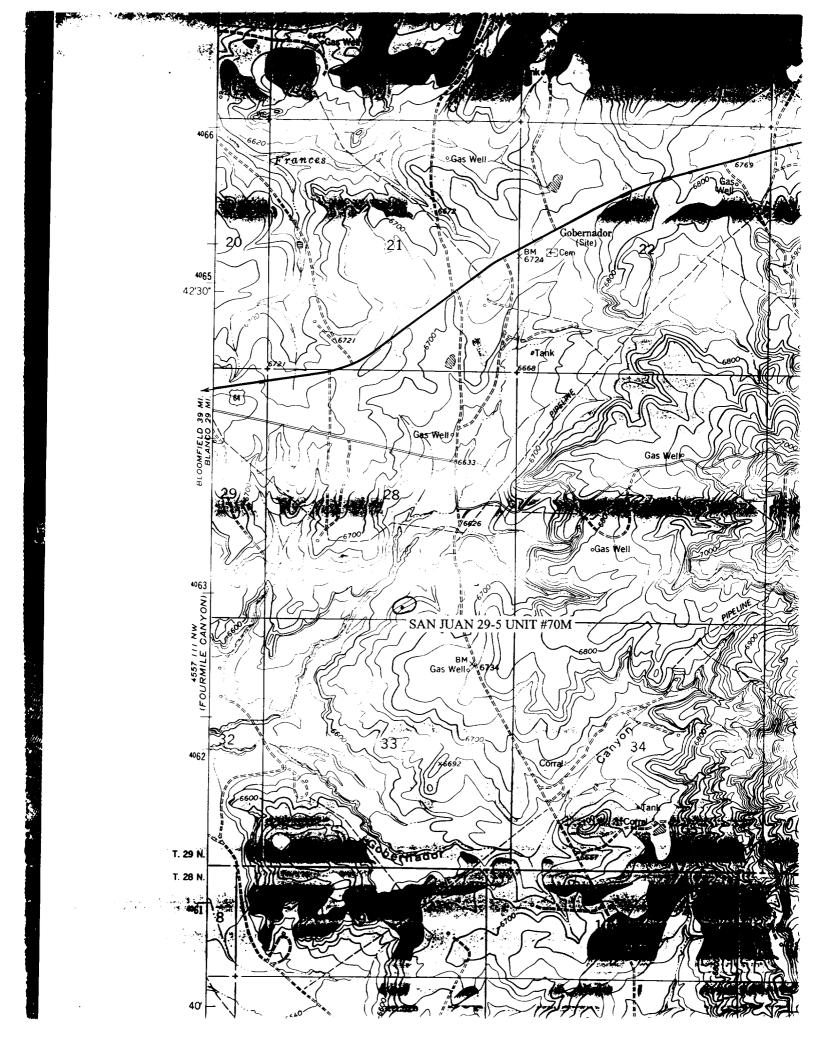
 SURVEYED:
 11/17/99
 REV. DATE:
 APP. BY

 DRAWN BY:
 K.REA
 DATE DRAWN:
 11/20/99
 FILE MAME:
 UF016

FIELD SERVICES INC.

P.O. BOX 3651 FARMINGTON, NM 87499 OFFICE: (505)334-0408





PLAT OF OFFSET OPERATORS SAN JUAN 29-5 UNIT #70M

20	21	22
PHILLIPS PETROLEUM COMPANY	PHILLIPS PETROLEUM COMPANY	PHILLIPS PETROLEUM COMPANY
29	28	27
PHILLIPS PETROLEUM COMPANY	#70M •	PHILLIPS PETROLEUM COMPANY
32	33	34
PHILLIPS PETROLEUM COMPANY	PHILLIPS PETROLEUM COMPANY	PHILLIPS PETROLEUM COMPANY