into gas pooling and operating agreements covering the acreage to be included in the unit and the production of gas from such unit.

(4) There are no wells on the proposed unit acreage which are completed within and producing from the vertical limits of the Rumont Gas Pool.

(5) The N/2 of Section 20 and the SW/4 of Section 20, T-19-S, R-37-E, have previously been designated by the Oil Conservation Commission as non-standard gas proration units of 320 acres and 160 acres, respectively.

(6) The proposed non-standard gas proration unit will meet the requirements of Rule 5(b) of the Oil Conservation Commission Order No. R-520 as follows:

(a) Contiguous quarter-quarter sections will comprise the unit.

(b) The proposed unit lies wholly within a single governmental section.

(c) All acreage within the proposed unit may reasonably be presumed productive of gas.

(d) The length or width of the proposed unit does not exceed 5280 feet.

(e) By copy of this letter of application all operators owning interests in the section in which the proposed unit is located and all operators within 1500 feet of the proposed unit well are notified by registered mail of the intent of Gulf Oil Corporation, Shell Oil Company, and J. B. Headley et al to form this proposed unit.

In view of the existence of the factors herein stated and compliance with the provisions of Rule 5(b) of the Special Rules and Regulations for the Rumont Gas Pool as set forth in Order R-520, Gulf Oil Corporation requests that the above described non-standard gas unit be approved and a 160-acre unit allowable be assigned effective on the first day of the month next succeeding the month in which this application is approved, or the date of filing of Form C-104 and Form C-110 and the gas-well plat on the proposed Gulf Oil Corporation - F. W. Rutter #3, or on the date of connection of said well to a gas transportation facility, whichever date is the later.

Respectfully submitted,

GULF OIL CORPORATION

By: B. E. Thompson
Division Production Manager