

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

**CASE NO. 12857  
ORDER NO. R-11848**

**APPLICATION OF BURLINGTON RESOURCES OIL & GAS COMPANY L.P., BP-AMOCO, AND ENERGEN RESOURCES CORPORATION FOR APPROVAL OF A PILOT INFILL DEVELOPMENT PROGRAM INCLUDING FIVE UNORTHODOX GAS WELL LOCATIONS AND, WHERE APPLICABLE, EXCEPTION TO DIVISION RULE 104.D (3), FOR PURPOSES OF ESTABLISHING A PILOT INFILL DEVELOPMENT PROGRAM IN THE PICTURED CLIFFS FORMATION TO DETERMINE PROPER WELL DENSITY REQUIREMENTS FOR PICTURED CLIFFS GAS WELLS IN SAN JUAN, SANDOVAL, AND RIO ARRIBA COUNTIES, NEW MEXICO.**

**ORDER OF THE DIVISION**

**BY THE DIVISION:**

This case came on for hearing at 8:15 a.m. on May 2, 2002 at Santa Fe, New Mexico, before Examiner Michael E. Stogner.

NOW, on this 25th day of October, 2002, the Division Director, having considered the testimony, the record and the recommendations of the Examiner,

**FINDS THAT:**

- (1) Due public notice has been given, and the Division has jurisdiction of this case and its subject matter.
- (2) Burlington Resources Oil & Gas Company L.P. ("Burlington"), BP-Amoco ("Amoco"), and Energen Resources Corporation ("Energen"), herein referred to collectively as "applicants," seek exception to Division Rule 104.D (3), where applicable, for a 30-well infill pilot study program, as further described in Exhibit "A" attached to this order, that includes approval of five unorthodox gas well locations in the Pictured Cliffs formation, in order to determine proper well density requirements for Pictured Cliffs wells in San Juan, Sandoval and Rio Arriba Counties, New Mexico ("San Juan Basin").
- (3) Within the San Juan Basin, Burlington currently operates approximately 1,413

active Pictured Cliff gas wells, Amoco operates approximately 814 Pictured Cliffs gas wells, and Energen operates approximately 514 Pictured Cliff gas wells.

(4) The applicants' proposed pilot program includes existing Pictured Cliffs spacing units within the following pools:

Aztec-Pictured Cliffs Pool (**71280**)  
Ballard-Pictured Cliffs Pool (**71439**)  
Blanco-Pictured Cliffs Pool (**72359**)  
South Blanco-Pictured Cliffs Pool (**72439**)  
Fulcher Kutz-Pictured Cliffs Pool (**77200**)  
Gavilan-Pictured Cliffs Pool (**77360**)  
West Kutz-Pictured Cliffs Pool (**79680**)  
Tapacito-Pictured Cliffs Pool (**85920**).

(5) The Aztec, Ballard, Blanco, Fulcher Kutz, Gavilan, and West Kutz Pictured Cliffs Pools are "unprorated gas pools" not subject to Part H of the Division's statewide rules entitled "*Gas Proration and Allocation*" (Rules 601 through 605). However, these six pools are currently governed by Division Rules 104.C (3) and D (3), which provide for 160-acre spacing units, require wells to be no closer than 660 feet to the outer boundary of their assigned units nor closer than 10 feet to any quarter-quarter section line or subdivision inner boundary, and preclude the drilling, recompletion, and production of a second gas well within a single 160-acre gas spacing unit.

(6) Both the South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Pools are prorated gas pools and are therefore subject to Part H of the Division's statewide rules (Rules 601 through 605). Both pools are developed on standard 160-acre spacing with wells no closer than 660 feet to the outer boundary of their assigned units nor closer than 10 feet to any quarter-quarter section line or subdivision inner boundary. While the pool rules governing both pools (see Division Order No. R-8170, as amended) do not specifically restrict the number of wells per unit neither do they specifically permit infill development.

(7) The geologic characteristics of the Pictured Cliffs pools/formations throughout the San Juan Basin can be described as follows:

- (a) low reservoir pressure;
- (b) low sustained producing rates;
- (c) high clay content;
- (d) shallow depth;
- (e) 60-110 feet of gross sandstone thickness; and
- (f) close proximity to the Fruitland coal seams.

(8) Volumetric analysis of existing data suggests that increasing well density to two wells per 160-acre spacing unit would recover additional reserves and that the current one-well per 160-acre unit density rule may result in a low percentage of the gas in place being produced.

(9) Burlington has studied 49 pairs of Pictured Cliffs gas wells. Each pair had been drilled and produced at the same time on the same 160-acre spacing unit prior to Division Rule 104.D (3). None of these spacing units now has both wells producing concurrently.

(10) Burlington's study of these 49 pairs, however, represents an analysis of wells on effective 80-acre density that is inconclusive and cannot be used exclusively to determine appropriate well density for the Pictured Cliffs formations/pools.

(11) Burlington's study of pressure data from 16 redrilled Pictured Cliffs wells demonstrates a relationship between distances from the original Pictured Cliffs gas well to its respective redrilled well and pressure. Generally higher pressures were observed in the redrilled well with increasing distance from the original well; however, this relationship again is not sufficient at this time to determine the appropriate well density in Pictured Cliffs formations/pools.

(12) The applicants presented results from Pictured Cliff redrill and restimulation programs involving: (i) 374 restimulations between 1995 and 2001; and (ii) 52 redrills from 1995 to 1999. The evidence presented by the applicants again shows that these analyses and results are preliminary and are inconclusive as to the appropriate well density for the Pictured Cliffs formations/pools in the San Juan Basin; therefore, additional data, further tests, and actual demonstrations obtained from the proposed infill program will be required to determine ultimate recovery of gas from the Pictured Cliffs formations/pools and proper well spacing.

(13) Based upon a study of current geologic and reservoir engineering data, the applicants have concluded that in order to adequately determine the ultimate recovery of gas from the Pictured Cliffs formation/pools there is a need for a pilot infill development program to study the relationship between well density and ultimate gas recovery.

(14) The applicants' evidence further indicates that the currently available data is either inadequate or insufficient since:

- (a) the resistivity of the Pictured Cliffs formation water is not known and may not have been accurately measured in the past;
- (b) current water saturation in the Pictured Cliffs is not

known with any degree of accuracy;

- (c) the productive potential of the lower portion of the Pictured Cliffs formation in some areas is not known;
- (d) electrical log properties of this lower Pictured Cliffs interval are not known; and
- (e) original gas in place for many productive areas is not known with any degree of accuracy.

(15) This pilot program is intended to:

- (a) enable the applicants to gather layer pressure measurements;
- (b) accumulate comprehensive technical data for study and reservoir simulation;
- (c) accurately determine formation water saturations; and
- (d) make an estimation of original gas-in-place and remaining reserves.

(16) The initial 30 pilot program wells are to be drilled or recompleted in 2002 and 2003 and will be located at standard gas well locations in accordance with Division Rule 104.C(3) except for five certain wells that are to be located at unorthodox gas well locations due to topography or because the existing wellbores slated for recompletion are non-standard for the Pictured Cliffs interval. The wells to be located at unorthodox locations, as well as the specific locations thereof, are identified in Exhibit "A" hereto.

(17) The pilot program wells were chosen based on the flowing criteria:

- (a) they must each be located 900 feet or more from an existing Pictured Cliffs well;
- (b) the existing Pictured Cliffs gas wells must be in good producing condition;
- (c) if any Basin-Fruitland Coal (Gas) Well exists within a subject 160-acre unit, it must not have high production

rates or cumulative recoveries;

- (d) offset Pictured Cliffs wells' cumulative recoveries should be between 0.7 and 1.5 BCF;
  - (e) they represent a variety of Pictured Cliffs pools; and
  - (f) they include wells located in both high and low permeability areas.
- (18) Criteria used for selecting the wellbores to be recompleted were:
- (a) current well production is less than 50 MCFD;
  - (b) casing and cement are in good mechanical condition; and
  - (c) production from the current producing formation can be commingled with production from the Pictured Cliffs formation.
- (19) No interested person appeared at the hearing in opposition to this application.

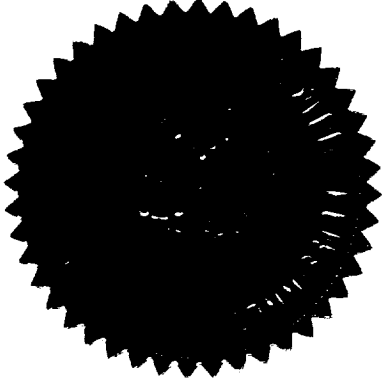
(20) Granting this application will afford the applicants the opportunity to gather additional data and examine various geologic and engineering factors to determine proper well density and well locations for all Pictured Cliffs Gas Pools and formations. Use of data from the pilot project could ultimately result in the recovery of additional gas reserves that may not otherwise be recovered, thereby preventing waste. Granting this application will not violate correlative rights.

**IT IS THEREFORE ORDERED THAT:**

(1) As an exception to Division Rules 104.C (3) and D (3), where applicable, the applicants, Burlington Resources Oil & Gas Company L.P., BP-Amoco, and Energen Resources Corporation are hereby authorized to conduct a 30-well infill pilot study program in the Pictured Cliffs formation within Rio Arriba, San Juan, and Sandoval Counties, New Mexico, as further described in Exhibit "A" attached to this order.

(2) Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.



SEAL

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

*Lori Wrotenbery*  
LORI WROTENBERY  
Director

**EXHIBIT "A"**  
**CASE NO. 12857**  
**ORDER NO. R-11848**  
**PICTURED CLIFFS INFILL PILOT STUDY PROGRAM**

- (1) The existing standard 160-acre gas spacing unit in the Ballard-Pictured Cliffs Pool (**71439**) comprising the SE/4 of Section 23, Township 26 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Huerfano Unit Well No. 147 (**API No. 30-045-05732**), located at a standard gas well location 1555 feet from the South line and 850 feet from the East line (Unit I) of Section 23. Burlington proposes to recomplate its existing Huerfano Unit Well No. 209 (**API No. 30-045-20759**), located at a standard infill gas well location 1500 feet from the South line and 1840 feet from the East line (Unit J) of Section 23.
- (2) A previous standard 160-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising the SW/4 of Section 11, Township 25 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, was dedicated to Burlington's plugged and abandoned Canyon Largo Unit Well No. 227 (**API No. 30-039-20789**), located at a standard gas well location 800 feet from the South line and 1810 feet from the West line (Unit N) of Section 11. Burlington proposes to recomplate its existing Canyon Largo Unit Well No. 278 (**API No. 30-039-20889**), located at a standard infill gas well location 1960 feet from the South line and 1820 feet from the West line (Unit K) of Section 11.
- (3) The existing standard 160.50-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising Lots 1 and 2 and the S/2 NE/4 (NE/4 equivalent) of Section 1, Township 26 North, Range 8 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Luthy "A" Well No. 1 (**API No. 30-045-06040**), located at a location that is now considered to be unorthodox 1980 feet from the North line and 510 feet from the East line (Unit H) of Section 1. Burlington proposes to recomplate its existing Luthy "A" Well No. 4 (**API No. 30-045-26613**), located at an unorthodox infill gas well location 2250 feet from the North line and 1610 feet from the East line (Unit G) of Section 1, which well was the subject of Division Administrative Order NSL-2199, dated December 9, 1985.
- (4) The existing standard 161.48-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising Lots 1 and 2 and the S/2 NE/4 (NE/4 equivalent) of Section 5, Township 27 North, Range 8 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Filan Well No. 1 (**API No. 30-045-06862**), located at a

standard gas well location 1650 feet from the North line and 800 feet from the East line (Unit H) of Section 5. Burlington proposes to recomplete its existing Filan Well No. 6 (**API No. 30-045-20355**), located at a standard infill gas well location 1850 feet from the North line and 1650 feet from the East line (Unit G) of Section 5.

- (5) The existing standard 160-acre gas spacing unit in the Aztec-Pictured Cliffs Pool (**71280**) comprising the NE/4 of Section 16, Township 28 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Sanchez "A" Com. Well No. 1 (**API No. 30-045-07480**), located at a standard gas well location 1650 feet from the North line and 690 feet from the East line (Unit H) of Section 16. Burlington proposes to recomplete its existing State "16" Well No. 2 (**API No. 30-045-25640**), located at a standard infill gas well location 1717 feet from the North line and 1850 feet from the East line (Unit G) of Section 16.
- (6) The existing standard 160-acre gas spacing unit in the Aztec-Pictured Cliffs Pool (**71280**) comprising the NW/4 of Section 33, Township 29 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to San Juan Well No. 22 (**API No. 30-045-07687**), located at a standard gas well location 1850 feet from the North line and 1180 feet from the West line (Unit E) of Section 33. Burlington proposes to recomplete its existing San Juan Well No. 24-E (**API No. 30-045-26596**), located at a standard infill gas well location 1050 feet from the North line and 1640 feet from the West line (Unit C) of Section 33.
- (7) The existing standard 160-acre gas spacing unit in the Aztec-Pictured Cliffs Pool (**71280**) comprising the SE/4 of Section 33, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Zachry Well No. 9 (**API No. 30-045-07628**), located at a standard gas well location 990 feet from the South and East lines (Unit P) of Section 33. Burlington proposes to recomplete its existing Zachry Well No. 45 (**API No. 30-045-25629**), located at a standard infill gas well location 825 feet from the South line and 1980 feet from the East line (Unit O) of Section 33.
- (8) The existing standard 160-acre gas spacing unit in the Fulcher Kutz-Pictured Cliffs Pool (**77200**) comprising the SE/4 of Section 25, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Delo Well No. 9 (**API No. 30-045-21126**), located at an unorthodox gas well location (approved by Division Administrative Order NSL-587, dated November 10, 1972) 1920 feet from the South line and 415 feet from the East line (Unit I) of Section 25. Burlington proposes to recomplete its existing Angel Peak "B" Well No.



26-E (**API No. 30-045-24360**), located at a standard infill gas well location 790 feet from the South and East lines (Unit P) of Section 25.

- (9) The existing standard 160-acre gas spacing unit in the Fulcher Kutz-Pictured Cliffs Pool (**77200**) comprising SW/4 of Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Garland "B" Well No. 1-R (**API No. 30-045-21732**), located at a standard gas well location 790 feet from the South line and 860 feet from the West line (Unit M) of Section 27. Burlington proposes to recomplate its existing Congress Well No. 18 (**API No. 30-045-25673**), located at an unorthodox infill gas well location 2127 feet from the South line and 1931 feet from the West line (Unit K) of Section 27.
- (10) The existing standard 160-acre gas spacing unit in the West Kutz-Pictured Cliffs Pool (**79680**) comprising the SE/4 of Section 32, Township 27 North, Range 10 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Huerfano Unit Well No. 80 (**API No. 30-045-06096**), located at a standard gas well location 674 feet from the South line and 980 feet from the East line (Unit P) of Section 32. Burlington proposes to recomplate its existing Huerfano Unit Well No. 227 (**API No. 30-045-20874**), located at a standard infill gas well location 1070 feet from the South line and 1840 feet from the East line (Unit O) of Section 32.
- (11) The existing standard 160-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising the NE/4 of Section 11, Township 27 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Turner Hughes Well No. 10 (**API No. 30-045-06710**), located at a standard gas well location 990 feet from the North line and 1650 feet from the East line (Unit B) of Section 11. Burlington proposes to recomplate its existing Turner Hughes Well No. 16 (**API No. 30-045-11874**), located at a standard infill gas well location 1840 feet from the North line and 1050 feet from the East line (Unit H) of Section 11.
- (12) The existing standard 160-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising the SW/4 of Section 24, Township 27 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Huerfanito Unit Well No. 45-R (**API No. 30-045-30480**), located at a standard gas well location 1140 feet from the South line and 1180 feet from the West line (Unit M) of Section 24. Burlington proposes to recomplate its existing Huerfanito Unit Well No. 77 (**API No. 30-045-06358**), located at a standard infill gas well location 1850 feet from the South and West lines (Unit K) of Section 24.

- (13) The existing standard 160-acre gas spacing unit in the Aztec-Pictured Cliffs Pool (**71280**) comprising the NW/4 of Section 33, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Zachry Well No. 12 (**API No. 30-045-20801**), located at a standard gas well location 1850 feet from the North and West line (Unit F) of Section 33. Burlington proposes to recomplete its existing Zachry Well No. 29 (**API No. 30-045-25503**), located at a standard infill gas well location 937 feet from the North line and 1785 feet from the West line (Unit C) of Section 33.
- (14) The existing standard 160-acre gas spacing unit in the Fulcher Kutz-Pictured Cliffs Pool (**77200**) comprising the NE/4 of Section 13, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Angel Peak "B" Well No. 14-R (**API No. 30-045-29446**), located at a standard gas well location 1850 feet from the North line and 1830 feet from the East line (Unit G) of Section 13. Burlington proposes to recomplete its existing Angel Peak "B" Well No. 34 (**API No. 30-045-25492**), located at a standard infill gas well location 660 feet from the North and East lines (Unit A) of Section 13.
- (15) The existing standard 160-acre gas spacing unit in the Fulcher Kutz-Pictured Cliffs Pool (**77200**) comprising the SE/4 of Section 28, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Mangum Well No. 3 (**API No. 30-045-07810**), located at a standard gas well location 1650 feet from the South and East lines (Unit J) of Section 28. Burlington proposes to recomplete its existing Mangum Well No. 6 (**API No. 30-045-25721**), located at an unorthodox infill gas well location 411 feet from the South line and 1650 feet from the East line (Unit O) of Section 28.
- (16) The existing standard 160.35-acre gas spacing unit in the Ballard-Pictured Cliffs Pool (**71439**) comprising Lots 1 and 2 and the S/2 NE/4 (NE/4 equivalent) of Section 2, Township 26 North, Range 9 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's Huerfano Unit Well No. 15 (**API No. 30-045-06070**), located at a standard gas well location 990 feet from the North and East lines (Lot 1/Unit A) of Section 2. It is Burlington's intent to drill its proposed Huerfano Unit Well No. 15-J (**API No. 30-045-31048**) at a standard infill gas well location 1970 feet from the North line and 1870 feet from the East line (Unit G) of Section 2.
- (17) The existing standard 160-acre gas spacing unit in the Tapacito-Pictured Cliffs Pool (**85920**) comprising the NW/4 of Section 16, Township 27 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Burlington's San Juan "27-5" Unit Well No. 152

(**API No. 30-039-20617**), located at a standard gas well location 1500 feet from the North line and 1000 feet from the West line (Unit E) of Section 16. It is Burlington's intent to drill its proposed San Juan "27-5" Unit Well No. 152-J (**API No. 30-039-26964**) at a standard infill gas well location 1530 feet from the North line and 1970 feet from the West line (Unit F) of Section 16.

- (18) The existing standard 160-acre gas spacing unit in the Blanco-Pictured Cliffs Pool (**72359**) comprising the SW/4 of Section 2, Township 31 North, Range 10 West, NMPM, San Juan County, New Mexico, is currently dedicated to Burlington's San Juan "32-9" Unit Well No. 98 (**API No. 30-045-23440**), located at a standard gas well location 790 feet from the South line and 800 feet from the West line (Unit M) of Section 2. It is Burlington's intent to drill its proposed San Juan "32-9" Unit Well No. 98-J (**API No. 30-045-31104**) at a standard infill gas well location 1730 feet from the South line and 1530 feet from the West line (Unit K) of Section 2.
- (19) The existing non-standard 160-acre gas spacing unit in the Fulcher Kutz-Pictured Cliffs Pool (**77200**) comprising the W/2 NW/4 and N/2 SW/4 of Section 14, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico, which was initially approved by Division Administrative Order NWU-80, dated May 20, 1955, is currently dedicated to Burlington's Aztec Well No. 700 (**API No. 30-045-28781**), located at an unorthodox gas well location (approved by Division Order No. R-9693, issued in Case No. 10496 on July 13, 1992) 2280 feet from the South line and 1500 feet from the West line (Unit K) of Section 14. Earlier this year Burlington drilled and completed its Aztec Well No. 3-R (**API No. 30-045-30750**) at a standard infill gas well location for this unit 1800 feet from the North line and 660 feet from the West line (Unit E) of Section 14.
- (20) The existing standard 160-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising the NE/4 of Section 22, Township 28 North, Range 8 West, NMPM, San Juan County, New Mexico, is currently dedicated to BP-Amoco's Tapp "LS" Well No. 6 (**API No. 30-045-20321**), located at a standard gas well location 790 feet from the North line and 1190 feet from the East line (Unit A) of Section 22. BP-Amoco proposes to recomplete its existing Tapp "LS" Well No. 1 (**API No. 30-045-07317**), located at a standard infill gas well location 1715 feet from the North line and 1100 feet from the East line (Unit H) of Section 22.
- (21) The existing standard 160-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising the NW/4 of Section 25, Township 28 North, Range 9 West, NMPM, San Juan County, New

Mexico, is currently dedicated to BP-Amoco's Warren "A" LS Well No. 3 (**API No. 30-045-07173**), located at a standard gas well location 1800 feet from the North and West lines (Unit F) of Section 25. BP-Amoco proposes to recomplete its existing Warren "A" LS Well No. 1-A (**API No. 30-045-25232**), located at a standard infill gas well location 790 feet from the North line and 1710 feet from the West line (Unit C) of Section 25.

- (22) The existing standard 160-acre gas spacing unit in the Aztec-Pictured Cliffs Pool (**71280**) comprising the SE/4 of Section 11, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico, is currently dedicated to BP-Amoco's Storey "B" LS Well No. 5 (**API No. 30-045-09601**), located at a standard gas well location 800 feet from the South line and 1800 feet from the East line (Unit O) of Section 11. BP-Amoco proposes to recomplete its existing Storey "B" LS Well No. 1-A (**API No. 30-045-23381**), located at a standard infill gas well location 1775 feet from the South line and 1850 feet from the East line (Unit J) of Section 11.
- (23) The existing standard 160-acre gas spacing unit in the West Kutz-Pictured Cliffs Pool (**79680**) comprising the SE/4 of Section 34, Township 28 North, Range 12 West, NMPM, San Juan County, New Mexico, is currently dedicated to BP-Amoco's Gallegos Canyon Unit Well No. 24 (**API No. 30-045-07003**), located at a standard gas well location 1650 feet from the South and 510 East lines (Unit J) of Section 34. BP-Amoco proposes to recomplete its existing Gallegos Canyon Unit Well No. 204-E (**API No. 30-045-25262**), located at an unorthodox infill gas well location 1710 feet from the South line and 425 feet from the East line (Unit I) of Section 34, which well was the subject of Division Administrative Order NSL-1166, dated March 27, 1980.
- (24) The existing standard 160-acre gas spacing unit in the West Kutz-Pictured Cliffs Pool (**79680**) comprising the SE/4 of Section 27, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, is currently dedicated to BP-Amoco's Gallegos Canyon Unit Well No. 527 (**API No. 30-045-29033**), located at a standard gas well location 975 feet from the South line and 1150 feet from the East line (Unit P) of Section 27. BP-Amoco proposes to recomplete its existing Gallegos Canyon Unit Well No. 160 (**API No. 30-045-07832**), located at a standard infill gas well location 1850 feet from the South line and 1190 feet from the East line (Unit I) of Section 27.
- (25) The existing standard 160-acre gas spacing unit in the Tapacito-Pictured Cliffs Pool (**85920**) comprising the SW/4 of Section 18, Township 26 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Jicarilla "98" Well No. 7 (**API No. 30-039-06433**), located at a standard gas well location 790 feet from the

South and West lines (Unit M) of Section 18. Energen proposes to drill its Jicarilla "98" Well No. 12-A at a standard infill gas well location 1160 feet from the South line and 1920 feet from the West line (Unit N) of Section 18.

- (26) The existing standard 159.66-acre gas spacing unit in the South Blanco-Pictured Cliffs Pool (**72439**) comprising Lots 1 and 2 and the S/2 NE/4 (NE/4 equivalent) of Section 6, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Jicarilla West Well No. 2 (**API No. 30-039-06743**), located at a standard gas well location 860 feet from the North line and 950 feet from the East line (Lot 1/Unit A) of Section 6. Energen proposes to drill its Jicarilla West Well No. 8-B at a standard infill gas well location, more or less, 1305 feet from the North line and 1940 feet from the East line (Lot 2/Unit B) of Section 6.
- (27) The existing standard 160-acre gas spacing unit in the Gavilan-Pictured Cliffs Pool (**77360**) comprising the NW/4 of Section 14, Township 26 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Jicarilla "99" Well No. 13 (**API No. 30-039-20167**), located at a standard gas well location 990 feet from the North line and 1650 feet from the West line (Unit C) of Section 14. Energen proposes to drill its Jicarilla "99" Well No. 18 at a standard infill gas well location 1965 feet from the North line and 1980 feet from the West line (Unit F) of Section 14.
- (28) The existing standard 195.91-acre gas spacing unit in the Tapacito-Pictured Cliffs Pool (**85920**) comprising Lots 1 and 2 and the S/2 NE/4 (NE/4 equivalent) of irregular Section 4, Township 25 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Florance Federal Well No. 3 (**API No. 30-039-06170**), located at a standard gas well location 1251 feet from the North line and 961 feet from the East line (Lot 1/Unit A) of irregular Section 4. Energen proposes to drill its Florance Federal Well No. 7-B at a standard infill gas well location 1470 feet from the North line and 1980 feet from the East line (Lot 2/Unit B) of irregular Section 4.
- (29) The existing standard 160-acre gas spacing unit in the Gavilan-Pictured Cliffs Pool (**77360**) comprising the SE/4 of Section 26, Township 27 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Jicarilla "95" Well No. 10 (**API No. 30-039-20170**), located at a standard gas well location 990 feet from the South line and 1650 feet from the East line (Unit O) of Section 26. Energen proposes to recomplate its existing Jicarilla "95" Well No. 8-B (**API No. 30-039-26547**), located at a standard infill gas well location

1950 feet from the South line and 1890 feet from the East line (Unit J) of Section 26.

- (30) The existing standard 160-acre gas spacing unit in the Gavilan-Pictured Cliffs Pool (**77360**) comprising the SE/4 of Section 2, Township 26 North, Range 3 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Energen's Jicarilla "96" Well No. 9 (**API No. 30-039-82347**), located at a standard gas well location 890 feet from the South line and 1750 feet from the East line (Unit O) of Section 2. Energen proposes to recomplete its existing Jicarilla "96" Well No. 2-B (**API No. 30-039-26552**), located at an unorthodox infill gas well location 2430 feet from the South line and 1265 feet from the East line (Unit I) of Section 2.