

LA PLATA GATHERING SYSTEM, INC.

1940 MERCANTILE DALLAS BUILDING

DALLAS I, TEXAS

Mr. A. L. Porter, Jr., Secretary Oil Conservation Commission of the State of New Mexico Post Office Box 871 Santa Fe, New Mexico



Dear Mr. Porter:

Please find enclosed herewith Application of La Plata Gathering System, Inc., for an exception to Commission Rule Number 104(d)(2) for an unorthodox location for a well to be drilled to the Dakota formation in the East half of Section 27, Township 32 North, Range 6 West, Rio Arriba County, New Mexico.

Thanking you in advance for your expeditious attention to this Application and with best wishes, I am

Yours very truly,

William G. Webb

WGW:ss Enclosure cc: Mr. Frank A. Schultz 2630 Fidelity Union Tower, Dallas, Texas

> Mr. Jack London, Jr. Benson-Montin-Greer Drilling Corp. 2808 First National Building Oklahoma City, Oklahoma

## BEFORE THE OIL CONSERVATION COMMISSION

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OF THE STATE OF NEW MEXICO

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IN THE MATTER OF THE APPLICATION OF LA PLATA GATHERING SYSTEM, INC., FOR AN EXCEPTION TO RULE 104(d)(2) FOR AN UNORTHODOX LOCATION FOR A WELL TO BE DRILLED TO THE DAKOTA FORMATION IN THE EAST HALF OF SECTION 27, TOWNSHIP 32 NORTH, RANGE 6 WEST, RIO ARRIBA COUNTY, NEW MEXICO

CASE NUMBER

TO THE HONORABLE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO:

Comes now LA PLATA GATHERING SYSTEM, INC., as Unit Operator of the San Juan 32-5 Unit Area, and respectfully requests an exception to Rule 104(d)(2) for an unorthodox location for a well to be drilled to the Dakota Formation and, based upon the productivity of the formations encountered, to be dually completed in the Mesaverde and Dakota Formations at a location eight hundred and forty feet (840') from the North line and seven hundred and thirty five feet (735') from the East line of Section 27, Township 32 North, Range 6 West, N.M.P.M., Rio Arriba County, New Mexico, and, for cause, would show as follows:

I.

As the Commission may be advised, a substantial portion of the E/2 of Section 27, Township 32 North, Range 6 West, lies below an elevation of sixty one hundred feet (6100') and will be inundated or subject to inundation by the waters of the Navajo Dam on the San Juan River. Furthermore, the United States Department of Interior has ruled that any well drilled adjacent to the Navajo Reservoir must not be located closer than three hundred horizontal feet (300') from the sixty-one hundred feet (6100') contour line. Due to topographic conditions in the E/2 of Section 27 any orthodox location three hundred feet (300') away from the sixty-one hundred feet (6100') contour line would necessitate an unconscionable expenditure of money to prepare the wellsits. A plat of the proposed location is attached hereto as Exhibit "A". A plat of the area showing the topographic conditions present is attached hereto as Exhibit "B". The ownership of all oil and gas leases within a radius of seven hundred and ninety feet (790') of the proposed location is common with the ownership of the oil and gas leases under the proposed location, said owners being J. Glenn Turner, Frank A. Schultz, William G. Webb and Benson-Montin-Greer Drilling Corp.

Premises considered, the undersigned, as Operator of the San Juan 32-5 Unit Area, respectfully requests the Secretary of the Commission to grant an exception to the well location requirement of Rule 104(d)(2) without notice or hearing pursuant to the authority granted by the Commission's Rule 104(f).

> Respectfully submitted, LA PLATA GATHERING SYSTEM, INC.

Webb, Vice President

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NEW MEXICO OF CONSERVATION COMMISSION

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Well Location and Acreage Dedication Plat:

EXHIBIT "B"

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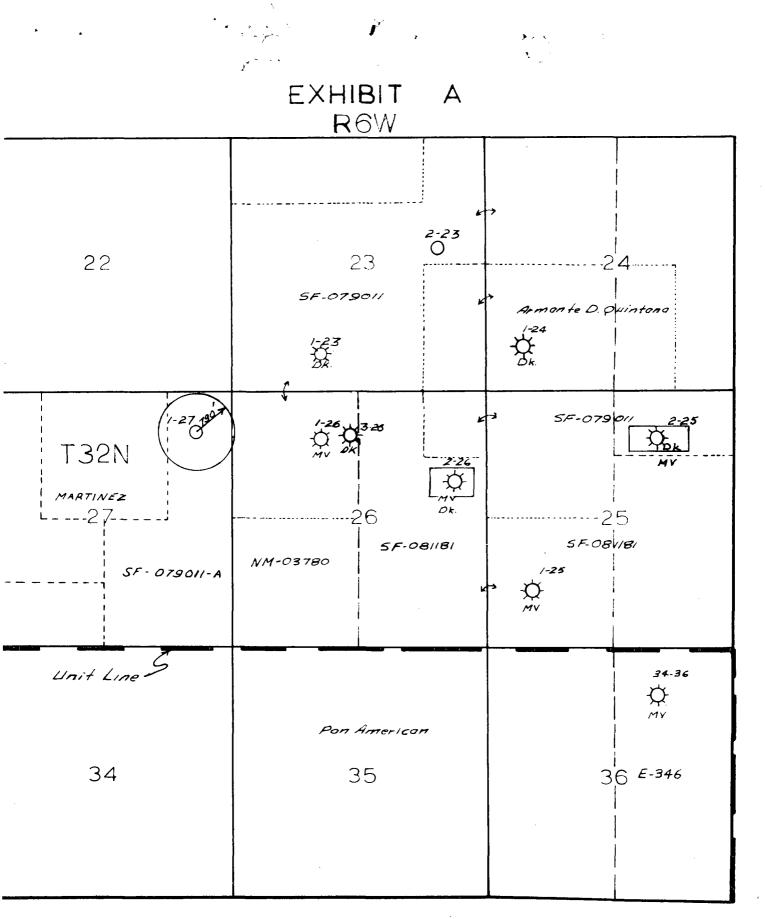
Registered Professional Engineer and/or Land Surveyor James P. Leese N. Mex. Reg. No. 1463 San Juan Engineering Company

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erator J. GLENN TURNER	· .	Leese					
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Farmington, New Mexico

Form C-128 (6-57)



RIO ARRIBA COUNTY, NEW MEXICO scale: 1=2000