

DATE IN 9/7/07	SUSPENSE	ENGINEER D. BROOKS	LOGGED IN 9/7/07	TYPE NSP	APP NO. pTDS0725052582
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau
 1220 South St. Francis Drive, Santa Fe, NM 87505



C06
 Continental Ad #13
 1922

2007 SEP 7 AM 11:06

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

- [1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]
- [A] Location - Spacing Unit - Simultaneous Dedication
☐ NSL ☒ NSP ☐ SD
- Check One Only for [B] or [C]
- [B] Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM
- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR
- [D] Other: Specify _____
- [2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☐ Does Not Apply
- [A] ☐ Working, Royalty or Overriding Royalty Interest Owners
- [B] ☐ Offset Operators, Leaseholders or Surface Owner
- [C] ☐ Application is One Which Requires Published Legal Notice
- [D] ☐ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] ☐ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

PHYLLIS A. EDWARDS
 Print or Type Name

Phyllis A. Edwards
 Signature

REGULATORY ANALYST
 Title

9/6/07
 Date

432-685-4340

pedwards@conchoresources.com
 e-mail Address

Continental A State #13

COG proposes to drill a NW / 4, 27.94 acre spacing
Empire: Glorieta-Yeso oil well
TD of approximately 5550'

Location:

1650' FNL & 330' FWL Sec 30, T17S, R30E, Lot 2 Eddy County, NM

This location is in Lot 2 and is 27.94 acres which is approximately 70% of a 40 acre unit, and therefore a Non Standard Spacing Unit. The proposed location is the second Empire Yeso well in this lot.

The plan for this well is to complete it in the Yeso formation. We won't know the exact perms until we drill & log it, but it will be very similar to the Continental A State #11 (1450' FNL & 1907' FWL, Unit F) which was completed in September 2006.

The Continental A State #11 completion broke the Yeso up into 2 perf/stimulation intervals. At this time, we assume the Continental A State #13 should be very similar.

Continental A State #11 has perms from: 4436.5' – 5088' overall, but broken up into 2 separate intervals, with 2 separate fracs.

1st interval: 4436.5' – 4733.5',
acidized w/ 2100 gals,
frac'd w/ 95,844 gals gel, 8,025 # LiteProp, & 90,620# 16/30 sand.

2nd interval: 4840' – 5088',
acidized w/ 2100 gals,
frac'd w/ 81,000 gals gel, 8000# LiteProp, & 90,980# 16/30 sand.

Attachment 1

Plat showing 27.94 acre spacing

Attachment 2

Map & legend of offset wells.

Attachment 3

Updated land plat showing COG Operating LLC acreage. COG owns all of Section 30. The areas annotated in green are other COG leases.

This location is not encroaching the offsetting units.
The proposed location is the second Empire Yeso well in this Lot.

COG Operating LLC respectfully requests administrative approval without hearing for this Non-standard Spacing Unit.

DISTRICT I
1625 N. FRENCH DR., BOBBS, NM 88240

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised October 12, 2005
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe, New Mexico 87505

DISTRICT II
1 W. GRAND AVENUE, ARTESIA, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV
1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

WELL LOCATION AND ACREAGE DEDICATION PLAT

☐ AMENDED REPORT

API Number	Pool Code 96210	GLORIETA - Pool Name EMPIRE; YESO
Property Code 302472	Property Name CONTINENTAL A STATE	Well Number 13
OGRID No. 229137	Operator Name COG OPERATING, LLC	Elevation 3663'

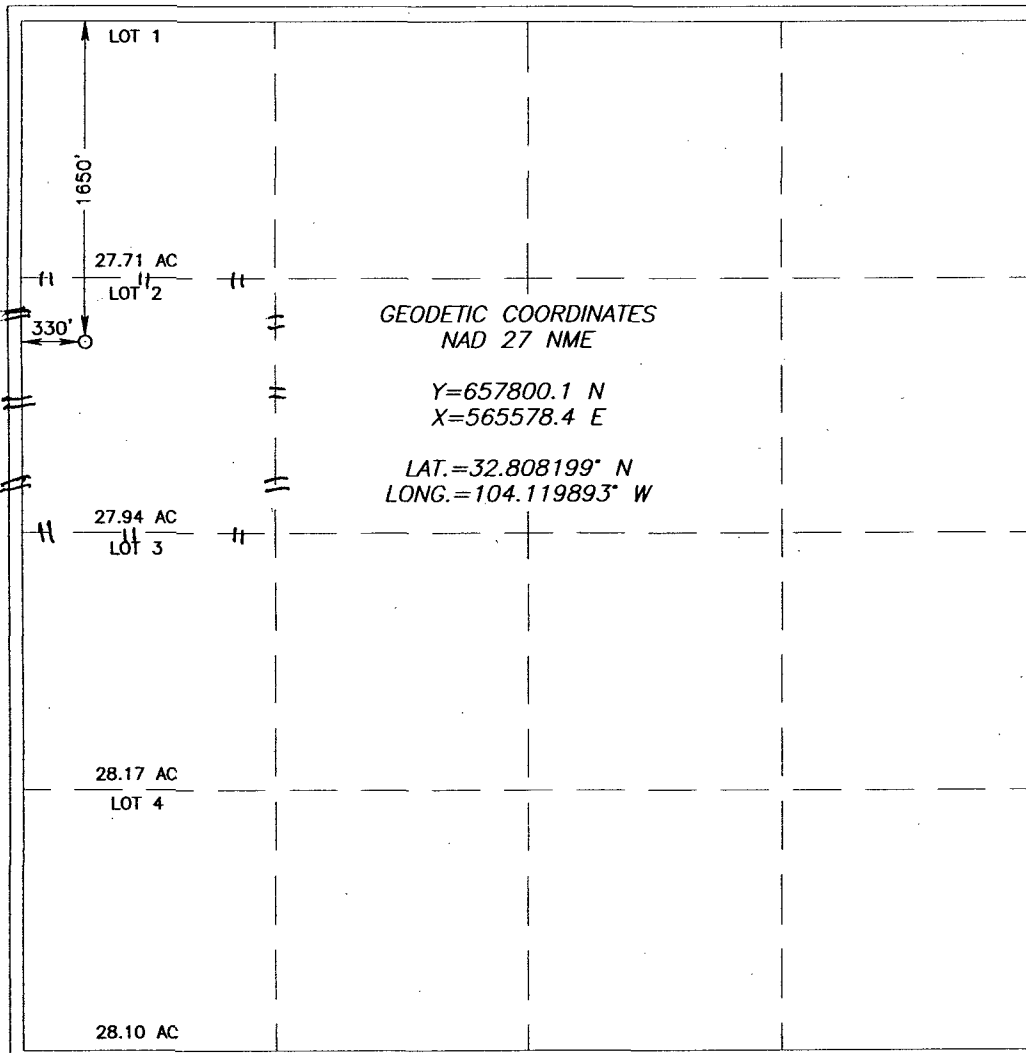
Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
2	30	17-S	29-E		1650	NORTH	330	WEST	EDDY

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres 27.94	Joint or Infill	Consolidation Code	Order No.						

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



OPERATOR CERTIFICATION

I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature: Phyllis A. Edwards Date: 9/6/07

Printed Name: PHYLLIS A. EDWARDS
REGULATORY
ANALYST

SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date: 9/6/07 DSS
Signature: Ronald J. Eidson Seal of Professional Surveyor 3239
Professional Surveyor 3239
Certificate No. 12841
GARY EIDSON 3239

Offset wells to Continental A State #13

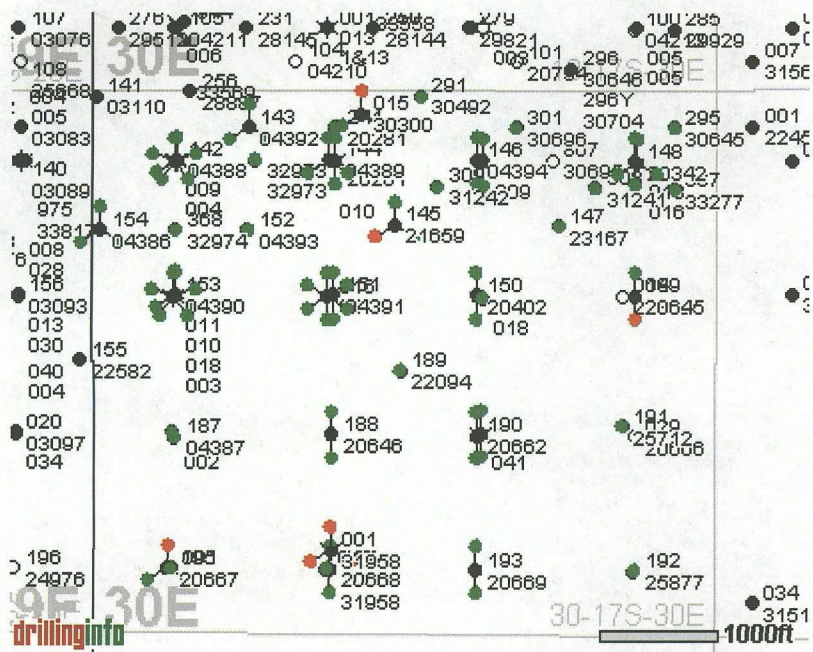
API#	Operator	Lease	Well#	Legal	Prac. IP (BO/D)	Prac. IP (MCF/D)	First Prod.	Avg. (BO/D)	Avg. (MCF/D)	Last Prod.	Cumu Oil
30-015-04386	MARBOB ENERGY CORP	BURCH KEELY UNIT	154	S:30, T:17S, R:30E	4.61	0.18	Jan 1993	4.77	0.23	May 2007	
30-015-04387	MARBOB ENERGY CORP	BURCH KEELY UNIT	187	S:30, T:17S, R:30E	1.84	1.71	Jun 1987	0.10	0.74	May 2007	
30-015-04388	MARBOB ENERGY CORP	BURCH KEELY UNIT	142	S:30, T:17S, R:30E	8.33	20.87	May 1994			May 2007	
30-015-04389	MARBOB ENERGY CORP	BURCH KEELY UNIT	144	S:30, T:17S, R:30E	4.71	27.39	Jan 1979			May 2007	
30-015-04389	MARBOB ENERGY CORP	BURCH KEELY UNIT	144	S:30, T:17S, R:30E	2.64	5.39	Jan 1973	9.61	42.55	Dec 1977	
30-015-04390	MARBOB ENERGY CORP	BURCH KEELY UNIT	153	S:30, T:17S, R:30E	0.79	0.07	Jan 1993	0.81	0.06	May 2007	
30-015-04391	MARBOB ENERGY CORP	BURCH KEELY UNIT	151	S:30, T:17S, R:30E	2.50	2.21	Jan 1979	0.81	0.06	May 2007	
30-015-04391	MARBOB ENERGY CORP	BURCH KEELY UNIT	151	S:30, T:17S, R:30E	0.25	0.50	Jan 1973	4.13	3.45	Dec 1977	
30-015-04392	MARBOB ENERGY CORP	BURCH KEELY UNIT	143	S:30, T:17S, R:30E	2.71	0.21	Jan 1993	16.48	0.45	May 2007	
30-015-04393	MARBOB ENERGY CORP	BURCH KEELY UNIT	152	S:30, T:17S, R:30E	4.94	2.71	Jul 1996	4.52	2.39	May 2007	
30-015-04394	MARBOB ENERGY CORP	BURCH KEELY UNIT	146	S:30, T:17S, R:30E	4.31	8.03	Jan 1972	1.13	3.55	Dec 1977	
30-015-04394	MARBOB ENERGY CORP	BURCH KEELY UNIT	146	S:30, T:17S, R:30E	1.21	1.82	Jan 1979			May 2007	
30-015-20281	MARBOB ENERGY CORP	BURCH KEELY UNIT	241	S:30, T:17S, R:30E	26.13	29.58	Sep 1994	3.58	42.16	May 2007	2
30-015-20342	MARBOB ENERGY CORP	BURCH KEELY UNIT	148	S:30, T:17S, R:30E	3.39	5.61	Jan 1979	1.06	2.71	May 2007	
30-015-20342	MARBOB ENERGY CORP	BURCH KEELY UNIT	148	S:30, T:17S, R:30E	14.90	27.79	Jan 1972	3.39	10.84	Dec 1977	
30-015-20402	MARBOB ENERGY CORP	BURCH KEELY UNIT	150	S:30, T:17S, R:30E	6.18	9.82	Jan 1979	1.90	3.84	May 2001	
30-015-20402	MARBOB ENERGY CORP	BURCH KEELY UNIT	150	S:30, T:17S, R:30E	38.38	71.62	Jan 1972	6.26	19.03	Dec 1977	
30-015-20645	MARBOB ENERGY CORP	BURCH KEELY UNIT	149	S:30, T:17S, R:30E	34.90	52.84	Jul 1972	2.26	7.19	Dec 1977	
30-015-20645	MARBOB ENERGY CORP	BURCH KEELY UNIT	149	S:30, T:17S,	2.18	3.71	Jan 1979	0.94	5.74	May 2007	

		UNIT		R:30E						
30-015-20646	MARBOB ENERGY CORP	BURCH KEELY UNIT	188	S:30, T:17S, R:30E	80.00	111.97	Aug 1972	2.26	7.19	Dec 1977
30-015-20646	MARBOB ENERGY CORP	BURCH KEELY UNIT	188	S:30, T:17S, R:30E	1.00	3.71	Jan 1979	2.00	4.10	May 2007
30-015-20662	MARBOB ENERGY CORP	BURCH KEELY UNIT	190	S:30, T:17S, R:30E	1.11	8.36	Jan 1979	1.03	7.07	Apr 2000
30-015-20662	MARBOB ENERGY CORP	BURCH KEELY UNIT	190	S:30, T:17S, R:30E	80.00	111.97	Aug 1972	5.06	16.16	Dec 1977
30-015-20667	MARBOB ENERGY CORP	BURCH KEELY UNIT	195	S:30, T:17S, R:30E	2.14	20.75	Jan 1993	1.50	23.30	Jun 2001
30-015-20668	MARBOB ENERGY CORP	BURCH KEELY UNIT	194	S:30, T:17S, R:30E	9.83	20.93	Mar 1976	3.97	12.55	Dec 1977
30-015-20668	MARBOB ENERGY CORP	BURCH KEELY UNIT	194	S:30, T:17S, R:30E	3.89	6.50	Jan 1979	1.55	0.39	Aug 1986
30-015-20669	MARBOB ENERGY CORP	BURCH KEELY UNIT	193	S:30, T:17S, R:30E	2.86	4.64	Jan 1979	0.13	1.63	Jun 2004
30-015-20669	MARBOB ENERGY CORP	BURCH KEELY UNIT	193	S:30, T:17S, R:30E	18.87	39.48	Apr 1973	2.87	9.03	Dec 1977
30-015-21659	MARBOB ENERGY CORP	BURCH KEELY UNIT	145	S:30, T:17S, R:30E	0.71	0.07	Jan 1993	5.45	0.35	May 2007
30-015-22094	MARBOB ENERGY CORP	BURCH KEELY UNIT	189	S:30, T:17S, R:30E	3.03	2.74	Jun 1996	1.58	1.65	Mar 2002
30-015-23167	MARBOB ENERGY CORP	BURCH KEELY UNIT	147	S:30, T:17S, R:30E	26.53	57.97	Mar 1981	1.32	0.06	May 2007
30-015-25712	MARBOB ENERGY CORP	BURCH KEELY UNIT	191	S:30, T:17S, R:30E	10.48	23.58	Jun 1987	4.06		May 2007
30-015-25877	MARBOB ENERGY CORP	BURCH KEELY UNIT	192	S:30, T:17S, R:30E	16.90	19.29	Jun 1988	1.19		May 2007
30-015-30300	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP UNIT	015	S:30, T:17S, R:30E	4.17	19.76	Jan 1960	0.00	0.03	Jul 2003
30-015-30492	MARBOB ENERGY CORP	BURCH KEELY UNIT	291	S:30, T:17S, R:30E	62.35	172.61	Apr 1999	5.35	15.48	May 2007
30-015-30645	MARBOB ENERGY CORP	BURCH KEELY UNIT	295	S:30, T:17S, R:30E	22.80	98.17	Aug 1999		21.55	May 2007
30-015-30696	MARBOB ENERGY CORP	BURCH KEELY UNIT	301	S:30, T:17S, R:30E	75.03	65.35	Dec 1999		0.63	Apr 2007
30-015-31241	MARBOB ENERGY CORP	BURCH KEELY UNIT	308	S:30, T:17S, R:30E	30.52	80.42	Dec 2000	0.90	22.74	May 2007
30-015-31242	MARBOB ENERGY CORP	BURCH KEELY UNIT	309	S:30, T:17S, R:30E	34.55	22.94	Sep 2000	0.90	39.81	May 2007

30-015-31958	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP 30 FEDERAL	001	S:30, T:17S, R:30E	5.13	1,537.52	Dec 2001	10.29	225.61	Feb 2006
30-015-04392		BURCH B	143	S:30, T:17S, R:30E	0.29	0.25	Jan 1979	17.42	0.45	Dec 1993
30-015-04392		BURCH B	143	S:30, T:17S, R:30E	0.61	1.32	Dec 1974	0.48	0.42	Dec 1977
30-015-21659		BURCH B	145	S:30, T:17S, R:30E	4.93	94.46	Jan 1979	5.77	0.35	Dec 1993
30-015-21659		BURCH B	145	S:30, T:17S, R:30E	59.03	309.43	Mar 1976	8.16	146.74	Dec 1977
30-015-04388		BURCH B	142	S:30, T:17S, R:30E	1.43	1.07	Jan 1970	0.29	0.19	Dec 1977
30-015-04388		BURCH B	142	S:30, T:17S, R:30E	0.18	0.14	Jan 1979	3.83	7.50	Jun 1986
30-015-04390		BURCH B	153	S:30, T:17S, R:30E	0.75	0.61	Jan 1979	0.77	0.06	Dec 1992
30-015-04390		BURCH B	153	S:30, T:17S, R:30E	6.50	13.18	Jan 1973	1.23	0.97	Dec 1977
30-015-04386		BURCH B	154	S:30, T:17S, R:30E	2.61	5.61	Dec 1974	12.97	42.77	Dec 1977
30-015-04386		BURCH B	154	S:30, T:17S, R:30E	6.82	27.54	Jan 1979	5.03	0.23	Dec 1993
30-015-00000		BURCH B	016	S:30, T:17S, R:30E	12.43	0.00	Jan 1950	0.20	0.23	Jun 1986
30-015-00000		BURCH B	016	S:30, T:17S, R:30E	11.58	24.87	Dec 1974	2.19	1.81	Dec 1977
30-015-00000		BURCH C	041	S:30, T:17S, R:30E	3.39	55.71	Jan 1979	0.68	6.87	Jan 1990
30-015-00000		BURCH C	041	S:30, T:17S, R:30E	17.67	111.77	Oct 1977	17.68	107.81	Dec 1977
30-015-20667		BURCH C	195	S:30, T:17S, R:30E	3.29	5.61	Jan 1979	2.35	27.87	Dec 1993
30-015-20667		BURCH C	195	S:30, T:17S, R:30E	84.60	118.37	Aug 1972	3.32	10.81	Dec 1977
30-015-33277	MARBOB ENERGY CORP	BURCH KEELY UNIT	367	S:30, T:17S, R:30E	38.67	41.97	Oct 2004	1.77	86.19	May 2007
30-015-32973	MARBOB ENERGY CORP	BURCH KEELY UNIT	366	S:30, T:17S, R:30E	78.73	103.43	May 2004	10.74	44.29	May 2007
30-015-32974	MARBOB ENERGY CORP	BURCH KEELY UNIT	368	S:30, T:17S, R:30E	32.06	32.35	Dec 2004	10.26	114.26	May 2007
30-015-00000	PRORATION G-2	BRUCH B	009	S:30, T:17S,	32.79	0.00	Jan 1949	3.19	0.00	Dec 1957

				R:30E							
30-015-00000	PRORATION G-2	BURCH B	010	S:30, T:17S, R:30E	20.00	0.00	Jan 1948	5.48	0.00	Dec 1957	
30-015-00000	PRORATION UNIT G-2	BURCH B	011	S:30, T:17S, R:30E	44.00	0.00	Jan 1948	4.65	0.00	Dec 1957	
30-015-00000	PRORATION UNIT G-2	BURCH B	012	S:30, T:17S, R:30E	10.17	0.00	Jan 1948	5.71	0.00	Dec 1957	
30-015-00000	PRORATION UNIT G-2	BURCH B	018	S:30, T:17S, R:30E	16.96	0.00	Jan 1953	10.70	13.40	Apr 1969	
30-015-00000	PRORATION UNIT W-1	BURCH "C"	009	S:30, T:17S, R:30E	0.00	0.00	Jan 1947	4.61	6.65	Dec 1971	
30-015-00000	GEN AMERICAN PRORATE	BURCH B FED	009	S:30, T:17S, R:30E	40.00	0.00	Jan 1947	2.97	5.35	Dec 1964	
30-015-00000	GEN AMERICAN PRORATE	BURCH B FED	010	S:30, T:17S, R:30E	31.82	0.00	Jan 1947	3.06	4.65	Dec 1962	
30-015-00000	GEN AMERICAN PRORATE	BURCH B FED	011	S:30, T:17S, R:30E	17.64	0.00	Jan 1947	4.55	0.00	Dec 1963	
30-015-00000	GEN AMERICAN PRORATE	BURCH B FED	012	S:30, T:17S, R:30E	12.57	0.00	Jan 1947	5.06	7.68	Dec 1962	
30-015-30300	GEN AMERICAN PRORATE	BURCH B FED	015	S:30, T:17S, R:30E	14.46	0.00	Jan 1950	3.00	4.74	Dec 1965	
30-015-00000	PRORATION UNIT G-2	BURCH B	013	S:30, T:17S, R:30E	16.32	0.00	Jan 1950	4.84	15.71	Dec 1960	
30-015-00000	PRORATION UNIT G-2	BURCH B	018	S:30, T:17S, R:30E	41.07	0.00	May 1950	17.81	0.00	Dec 1951	
30-015-00000	PRORATION UNIT G-1	BURCH B	018	S:30, T:17S, R:30E	19.76	0.00	Jan 1952	16.61	0.00	Dec 1952	
30-015-00000	TEXAS CO.	STATE N	001	S:30, T:17S, R:30E	8.89	0.00	Jan 1945	3.71	0.00	Dec 1945	
30-015-00000	THE TEXAS CO.	STATE N	002	S:30, T:17S, R:30E	19.32	0.00	Jan 1945	16.94	0.00	Dec 1945	
30-015-00000	THE TEXAS CO.	THE TEXAS CO.	003	S:30, T:17S, R:30E	20.04	0.00	Jan 1945	14.29	0.00	Dec 1945	
30-015-00000	THE TEXAS CO.	STATE N	004	S:30, T:17S, R:30E	19.32	0.00	Jan 1945	12.42	0.00	Dec 1945	
30-015-30300	PRORATION UNIT G-2	BURCH B	015	S:30, T:17S, R:30E	25.97	0.00	Aug 1949	5.55	0.00	Dec 1957	
30-015-00000	PRORATION UNIT G-2	BURCH B	016	S:30, T:17S, R:30E			Dec 1949	1.26	0.00	Dec 1953	
30-015-00000	GRAYBURG OIL CO.	BURCH B	009	S:30, T:17S, R:30E	44.00	0.00	Jan 1948	30.94	0.00	Dec 1948	

30-015-00000	WESTERN PROD. CO.	BURCH C	009	S:30, T:17S, R:30E	0.00	0.00	Jan 1948	6.06	0.00	Dec 1957
30-015-00000	GEN. AMERICAN	BURCH B	009	S:30, T:17S, R:30E	2.86	5.00	Jan 1965	0.97	0.39	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH B	010	S:30, T:17S, R:30E	3.00	5.48	Jan 1964	3.87	1.55	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH B	011	S:30, T:17S, R:30E	4.07	7.45	Jan 1964	11.10	4.55	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH B	012	S:30, T:17S, R:30E	3.93	7.17	Jan 1964	1.45	0.58	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	016	S:30, T:17S, R:30E	61.48	109.16	Feb 1971	17.00	24.48	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH C	018	S:30, T:17S, R:30E	67.43	62.57	May 1971	43.84	63.13	Dec 1971
30-015-31958	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP 30 FEDERAL	001	S:30, T:17S, R:30E						
30-015-31958	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP 30 FEDERAL	001	S:30, T:17S, R:30E	10.29	225.61	Jan 2006		10.87	May 2007



Brooks, David K., EMNRD

From: Phyllis Edwards [PEdwards@conchoresources.com]
Sent: Thursday, October 04, 2007 11:13 AM
To: Brooks, David K., EMNRD
Subject: RE: Continental A State No. 13 and State S-19#33

David,

I will get you the required information – thanks for your help !!!

Also, will these wells require simultaneous dedication, and if so, do you need anything from COG ?

Continental A State #13 1650 FNL & 330 FWL	Section 30, T17S, R29E	Lot 2
Continental A State # 9 2310 FNL & 580 FWL	API 30-015-32302 Section 30, T17S, R29E	Lot 2
State S-19 #33 1650 FSL & 1250 FWL	Section 19, T17S, R29E	Lot 3
State S-19 #19 2310 FSL & 550 FWL	API 30-015-35242 Section 19, T17S, R29E	Lot 3

Thanks,
Phyllis Edwards
 COG Operating LLC
 Fasken Tower II
 550 W. Texas Avenue, Suite 1300
 Midland, TX 79701
 432-685-4340 P
 432-685-4399 F
 pedwards@conchoresources.com

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us].
Sent: Thursday, October 04, 2007 12:50 PM
To: Phyllis Edwards
Subject: Continental A State No. 13 and State S-19#33

Phyllis

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

I realize that Rule 1210A(3) only requires notice to owners of tracts within the quarter/quarter section that are omitted from the unit, of which there are none. However, Rule 104.D(2)(b) allows the Director to grant exceptions for whole subdivisions having less than 70% of the normal acreage "after notice and opportunity for hearing." If no notice requirement other than that specified in Rule 1210.A(3) applied, the rules would be contradictory. And it absolutely makes sense to require notice to offsets in these cases because your application will permit you to drill

10/4/2007

up to 4 wells on 27 acres. I note that Rule 1210.A(3) requires notice to other persons as the Division requires.

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Please call me if you have questions.

David K. Brooks
Legal Examiner
505-476-3450

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10/4/2007

Phyllis Edwards

TO: DAVID
BROOKS

From: Phyllis Edwards
Sent: Thursday, October 04, 2007 1:02 PM
To: Brent Robertson; Stuart Dirks
Subject: FW: Continental A State No. 13 and State S-19#33

RECEIVED

2007 OCT 26 PM 3 30

Brent / Stuart,

Please let me know who I need to send notices to – thanks !!!

Phyllis Edwards
COG Operating LLC
Fasken Tower II
550 W. Texas Avenue, Suite 1300
Midland, TX 79701
432-685-4340 P
432-685-4399 F
pedwards@conchoresources.com

DAVID :

AS YOU REQUESTED

THANKS !

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]
Sent: Thursday, October 04, 2007 12:50 PM
To: Phyllis Edwards
Subject: Continental A State No. 13 and State S-19#33

Phyllis

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

I realize that Rule 1210A(3) only requires notice to owners of tracts within the quarter/quarter section that are omitted from the unit, of which there are none. However, Rule 104.D(2)(b) allows the Director to grant exceptions for whole subdivisions having less than 70% of the normal acreage "after notice and opportunity for hearing." If no notice requirement other than that specified in Rule 1210.A(3) applied, the rules would be contradictory. And it absolutely makes sense to require notice to offsets in these cases because your application will permit you to drill up to 4 wells on 27 acres. I note that Rule 1210.A(3) requires notice to other persons as the Division requires.

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**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

B P American Production Company
P O Box 3092
Houston, TX 77253-3092

Re: Request for Unorthodox Well Location

To Whom It May Concern:

This letter will serve as notice under Rule 104.F (3) that COG Operating LLC has requested administrative approval from the Oil Conservation Division in Santa Fe, NM for a Non-standard spacing Empire: GLORIETA-YESO oil well.

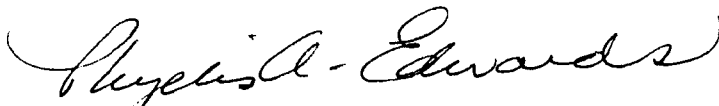
**CONTINENTAL A STATE #13
Eddy County, NM**

1650' FNL & 330' FWL Sec 30, T17S, R30E

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may allow COG to produce from the unorthodox location after the well is drilled, if no objection has been made within the 20 days after the application has been received.

Sincerely,

COG Operating LLC



Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Dominion Oklahoma Texas
Exploration & Production Inc.
14000 Quail Spring Parkway, Suite 1600
Oklahoma City, OK 73134

Re: Request for Unorthodox Well Location

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Sincerely,

COG Operating LLC



Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Marathon Oil Company
P O Box 3128
Houston, TX 77210-3128

Re: Request for Unorthodox Well Location

To Whom It May Concern:

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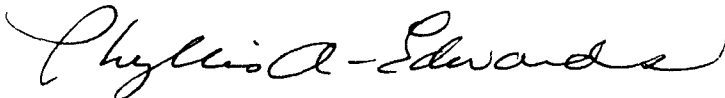
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Sincerely,

COG Operating LLC



Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Yates Petroleum Corporation
105 South Fourth Street
Artesia, NM 88210

Re: Request for Unorthodox Well Location

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Sincerely,

COG Operating LLC



Phyllis A. Edwards
Regulatory Analyst

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>B P American Production Co P O Box 3092 Houston, TX 77253-3092</p>		<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i> <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Delivery</p> <p>OCT 18 2004</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label) 7005 0390 0000 6041 6180</p> <p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Dominion Oklahoma Texas Exploration & Production Inc. 14000 Quail Spring Parkway Oklahoma City, OK 73134 Suite 1600</p>		<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i> <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery</p> <p>LEMANNA 10-19</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label) 7005 0390 0000 6041 6203</p> <p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

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<p>2. Article Number (Transfer from service label) 7005 0390 0000 6041 6197</p> <p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

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<p>2. Article Number (Transfer from service label) 7005 0390 0000 6041 6210</p> <p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Monday, November 12, 2007 4:45 PM
To: 'Phyllis Edwards'
Subject: RE: Continental A State No. 13 and State S-19#33

I received the information. Processing is slow due to time necessarily devoted to the pit rule hearing.

However, I have today written the NSP for the State 2-19 #33, and it should be issued tomorrow.

I noticed for the first time today that the application for the Continental A State No. 13 states the location is in T17S, R30E, though the plat says Range 29E. I assume Range 29E is correct, since Section 30 of 17S-30E is apparently not an irregular section.

However, I will need written confirmation that 30-17S-29E is the correct location.

Thanks

David Brooks
Legal Examiner
505-476-3450

From: Phyllis Edwards [mailto:PEdwards@conchoresources.com]
Sent: Monday, November 12, 2007 2:26 PM
To: Brooks, David K., EMNRD
Subject: RE: Continental A State No. 13 and State S-19#33

David,

I was checking to make sure you got the additional information for NSP that I show COG sent on 10-22-07. I was wondering when the NSP might be approved or if you needed anything else from COG.

Thanks for approving NSL 5695 for the State S-19 #33.

Thanks for your help !!!

Phyllis
Phyllis Edwards
COG Operating LLC
432-685-4340
pedwards@conchoresources.com

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]
Sent: Thursday, October 04, 2007 12:50 PM
To: Phyllis Edwards
Subject: Continental A State No. 13 and State S-19#33

Phyllis

11/12/2007

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

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11/12/2007

Brooks, David K., EMNRD

From: Phyllis Edwards [PEdwards@conchoresources.com]

Sent: Tuesday, November 13, 2007 9:00 AM

To: Brooks, David K., EMNRD

Subject: RE: NSL & NSP Applications

David,

The Continental A State 13 location is 30-17S-29E. The application that states Range 30E is incorrect and was my mistake. I am sorry for the mistake and thank you for catching that error.

Thanks for the update on processing time for applications. COG is awaiting approval on several applications that I have listed below. The applications are dated almost four weeks ago. I wondered if you needed anything else from COG for your review, and if you have an approximate wait time for the application approvals?

Continental A State 13	Eddy	1650 FNL, 330 FWL	Sec 30, T17S, R29E, UL E	App to Santa Fe 9-6-07
Edward State 4	Lea	1500 FSL, 2290 FWL	Sec 16, T17S, R32E, UL K	App to Santa Fe 10-25-07
Harper State 13	Eddy	375 FSL, 1500 FWL	Sec 16, T17S, R30E, UL N	App to Santa Fe 10-10-07
Juniper State 5	Eddy	990 FSL, 100 FEL	Sec 17, T17S, R30E, UL P	App to Santa Fe 10-22-07
Mimosa State 4	Eddy	1403 FSL, 1103 FWL	Sec 30, T17S, R29E, UL K	App to Santa Fe 10-16-07
Skelly Unit 942	Eddy	1210 FNL, 2195 FEL	Sec 22, T17S, R31E, UL B	App to Santa Fe 10-22-07
Skelly Unit 966	Eddy	1500 FSL, 1310 FWL	Sec 15, T17S, R31E, UL L	App to Santa Fe 10-19-07
Skelly Unit 967	Eddy	1250 FSL, 990 FEL	Sec 15, T17S, R31E, UL P	App to Santa Fe 10-19-07
Skelly Unit 969	Eddy	1290 FSL, 330 FWL	Sec 14, T17S, R31E, UL M	App to Santa Fe 10-19-07
Skelly Unit 971	Eddy	2310 FSL, 1525 FWL	Sec 14, T17S, R31E, UL K	App to Santa Fe 10-22-07
Texaco BE 9H	Eddy	890 FNL, 2510 FEL	Sec 16, T17S, R30E, UL B	App to Santa Fe 10-15-07

As always, thanks for your help !!!

Phyllis Edwards

COG Operating LLC

Fasken Tower II

550 W. Texas Avenue, Suite 1300

Midland, TX 79701

432-685-4340 P

11/19/2007

432-685-4399 F
pedwards@conchoresources.com

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]
Sent: Monday, November 12, 2007 5:45 PM
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Subject: RE: Continental A State No. 13 and State S-19#33

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COG Operating LLC
432-685-4340
pedwards@conchoresources.com

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Phyllis

11/19/2007

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