	24 07 SUSPEN	ISE Brooks 10/29/07 JURE NSL PKUR0730230646
		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 - Engineering Bureau - - Strait State Un it th
		ADMINISTRATIVE APPLICATION CHECKLIST 5747
TH	IIS CHECKLIST IS M	IANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
Applic.	[DHC-Dow [PC-Pc	ndard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] nhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] pol Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] Ilified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF AF [A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD
	Check [B]	Cone Only for [B] or [C] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
	[D]	Other: Specify
[2]	NOTIFICAT [A]	TION REQUIRED TO: - Check Those Which Apply, or Does Not Apply 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]		CURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE ATION 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.

Ocean Munds-Dry	Ocean Mundy-Dry	actor ney	10-24-07
Print or Type Name	Signature	Title 0	Date
		omundsdrytha	ollandhart. Com



Ocean Munds-Dry Associate omundsdry@hollandhart.com

30-025-38584

October 24, 2007

HAND-DELIVERED

Mark E. Fesmire, P.E. Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: Application of Yates Petroleum Corporation for Administrative/Approval of an Unorthodox Well Location for its Strait State Unit Well No. 6 located 660 feet from the North line and 2310 feet from the West line of Section 29, Township 10 South, Range 34 East, N.M.P.M., Lea County, New Mexico.

Dear Mr. Fesmire:

Sand Springs atoka - Monow

Pursuant to the provisions of Division Rule 104 F (2), Yates Petroleum Corporation ("Yates") hereby seeks administrative approval of an unorthodox well location for its Strait State Unit Well No. 6 located 660 feet from the North line and 2310 feet from the West line of Section 29, Township 10 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The N/2 of Section 29 will be dedicated to the well.

This location is unorthodox because it is governed by the Division's Statewide Rules and Regulations which provide for wells on 320-acre spacing to be located no closer than 660 feet to the outer boundary of the quarter section on which the well is located. The proposed location is unorthodox because it is only 330 feet from the eastern boundary of the quarter section on which the well is located. A standard 320-acre spacing and proration unit comprised of the N/2 of Section 29 will be dedicated to the well.

The unorthodox location is required by geologic conditions. As shown on the attached Basal Morrow Net Sand Isopach Map (attached as **Exhibit A**), a standard location would not be on the center of the channel. The proposed location would be near the center of the channel and encounter an estimated 40 feet of good sand. The productive lower Morrow wells are shown in purple. The adjacent wells are the Cash State Unit Well No. 5 (Section 19) and the Strait State Unit Well No. 5 (Section 20). These wells are located in the center of the channel and have thick sand. Yates has had poor results drilling on the edge of a channel. In addition to thinner sands, the porosity is not usually well developed on the channel edge. **Exhibit B** is Structural Cross-Section A-A'

HOLLAND&HART

Administrative Application Page 2

and shows these lower Morrow sands in yellow. Both the Cash State Unit No. 5 and the Strait State Unit No. 5 encountered good sand thicknesses, but with the center of the channel less than 1000 feet wide, a location several hundred feet away can be the difference between a good well and a poor well.

Attached hereto as **Exhibit C** is a plat as required by Rule 104.F (3). Section 29 is a part of the Strait State Unit. Therefore, Yates is also the offsetting operator upon which the well encroaches. Also, working interest ownership is common in each spacing unit. Therefore, there are no affected parties as defined by Rule 1210(A)(2) and no notice is required.

The proposed location is the most efficient and reasonable way to develop these potential reserves and would be in the best interest of conservation and the prevention of waste.

Your attention to this application is appreciated.

Sincerely,

Lean Munder 12

Ocean Munds-Dry Attorney for Yates Petroleum Corporation

Enclosures

cc: Mr. Robert Bullock Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88201

OCD - Hobbs

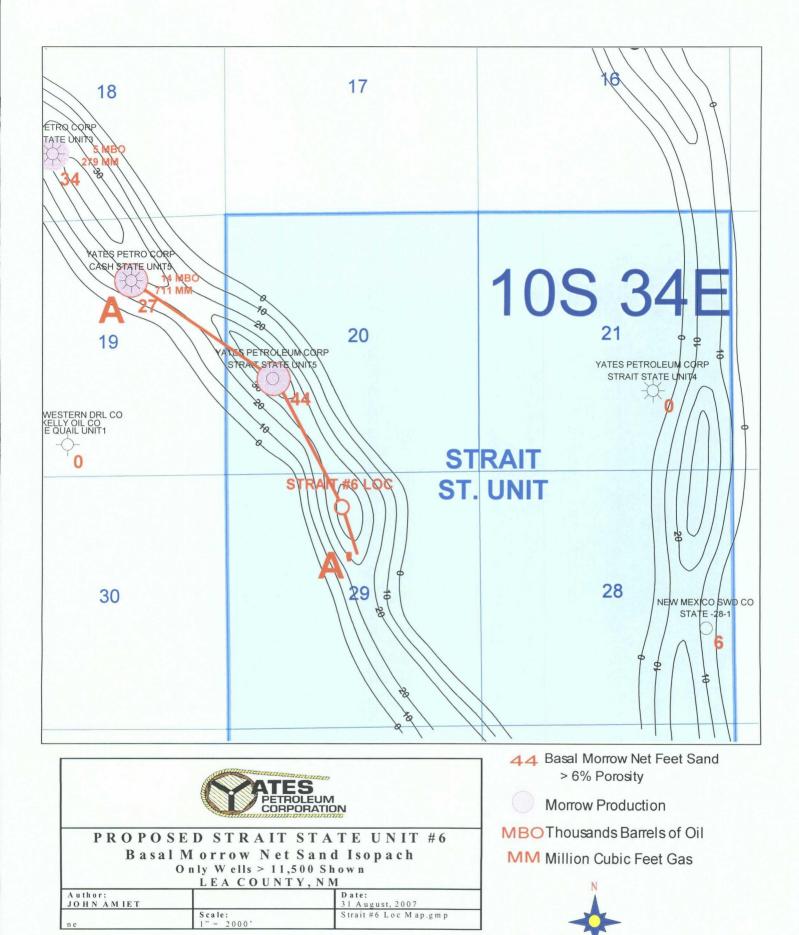
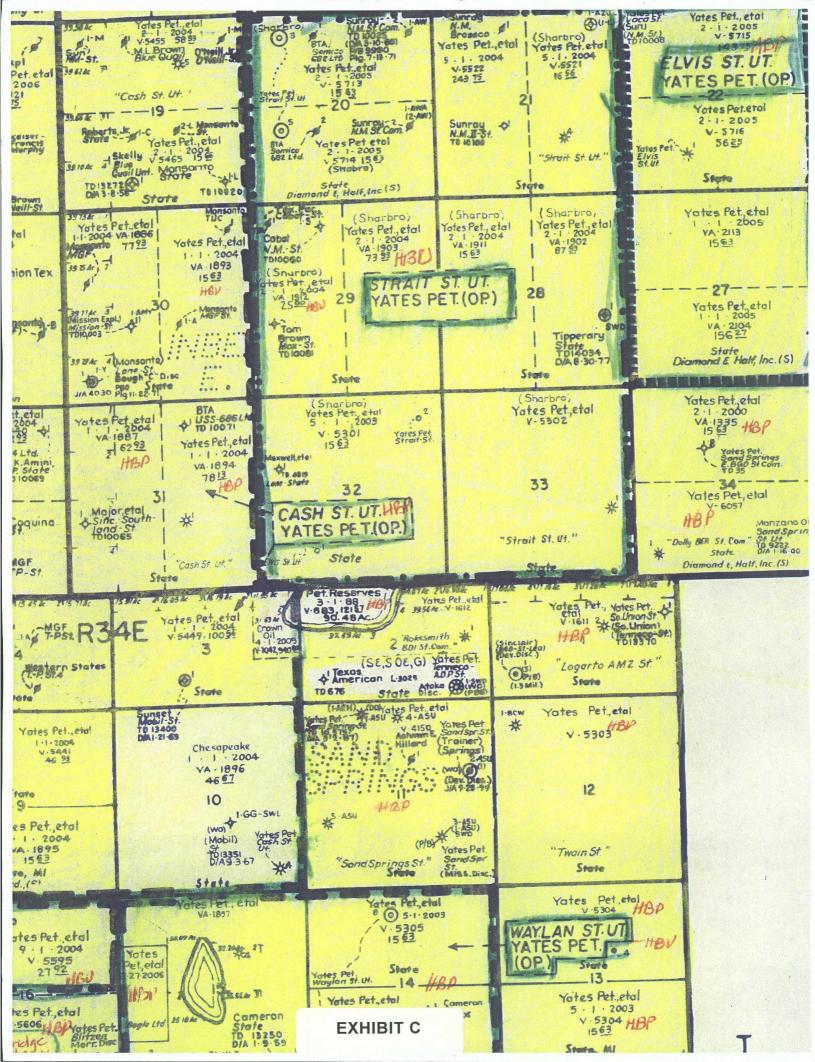


EXHIBIT A



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DATE IN	SL	SPENSE	ENGNEER	LOGG	EDIN	ТҮРЕ	RECHARMED
			- Engir	CONSER	RVATION DI RVATION DI Ureau - Santa Fe, NM 8		ACT 24 PM 4 34
		ADMI	NISTRAT	IVE AP	PLICATIC	DN C	CHECKLIST
Tł	HIS CHECKLIST				LICATIONS FOR EX AT THE DIVISION L		ONS TO DIVISION RULES AND REGULATIONS
(ppilo	[DHC-D [РС	Standard Loo ownhole Coo Pool Comm [WFX-Wa [SW]	mmingling] [ingling] [OL: terflood Expar /D-Salt Water [CTB-Lease S - Off-Leas Ision] [P Disposal]	Commingling] Se Storage] MX-Pressure M [IPI-Injection] [PL [OLM-(Mainter Pressu	5D-Simultaneous Dedication] LC-Pool/Lease Commingling] Off-Lease Measurement] nance Expansion] Ire Increase] sitive Production Response]
1]	TYPE OF [A] Locatio		it - Simulta	th Apply for [A] neous Dedication		
	Ch [B]] Commi	y for [B] or [C] ngling - Storag IC [] CTB	e - Measure] OL	.s 🗌 olm
	[C				rease - Enhanc D 🗌 IPI [
	[D] Other:	Specify				
2]	NOTIFIC. [A		-		ose Which App ling Royalty Int		Does Not Apply Owners
	[B]] 🗌 Of	fset Operators,	Leaseholde	ers or Surface O	Owner	
	[C] 🗌 Ar	plication is On	e Which Re	equires Publish	ed Leg	gal Notice
	[D] [] No U.S.	otification and/o Bureau of Land Manag	or Concurre gement - Commiss	ent Approval by sioner of Public Lands,	BLM State Lan	or SLO nd Office
	[E]	Fo	r all of the above	ve, Proof of	f Notification or	r Publi	cation is Attached, and/or,
	[F]	W	aivers are Attac	hed			
3]			E AND COMP NDICATED A		FORMATION	REQ	UIRED TO PROCESS THE TYPE
	val is accura t	te and compl	ete to the best of	of my know		ndersta	th this application for administrative and that no action will be taken on this Division.

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

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Ocean Munds.	Dry_	Ocianda	ndi-Drug	actor	- ney	10-24-07
Print or Type Name		Signature	0	Title	J	Date
				<u>Omon</u> e-mail Add	<u>dsdry@h</u>	ollandhart.com



Ocean Munds-Dry Associate omundsdry@hollandhart.com

October 24, 2007

HAND-DELIVERED

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Holland & Hart LLP

110 North Guadalupe Suite 1 Santa Fe, NM 87501 Mailing Address P.O.Box 2208 Santa Fe, NM 87504-2208

Aspen Billings Boise Boulder Cheyenne Colorado Springs Denver Denver Tech Center Jackson Hole Salt Lake City Santa Fe Washington, D.C. 🙃

HOLLAND&HART



Administrative Application Page 2

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Enclosures

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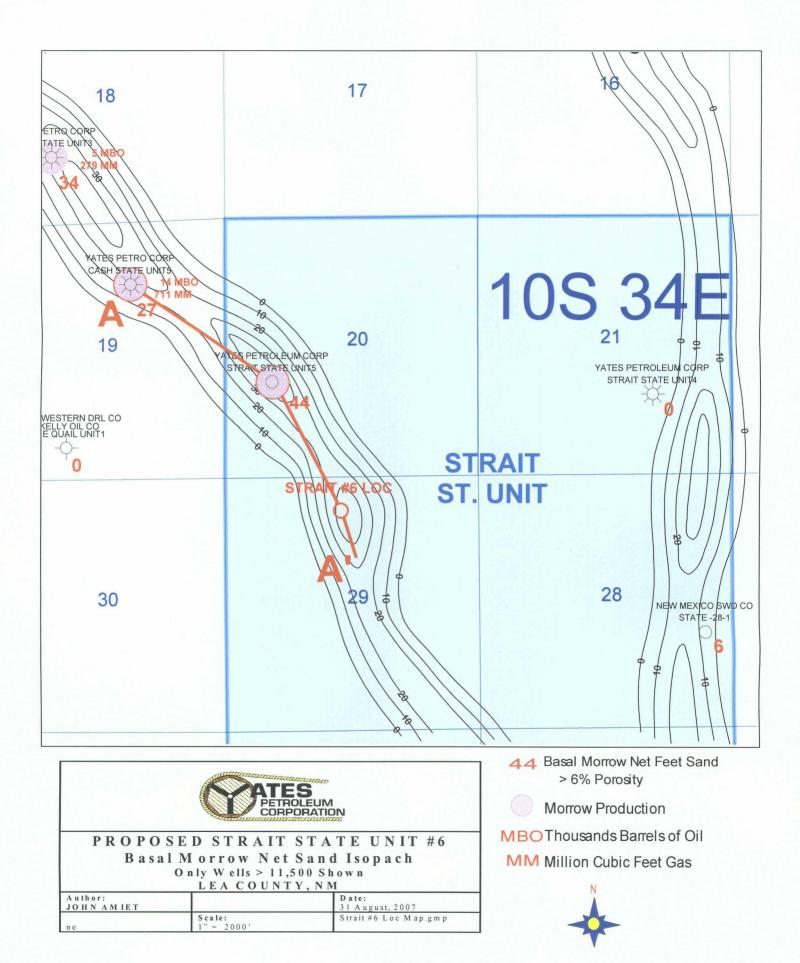
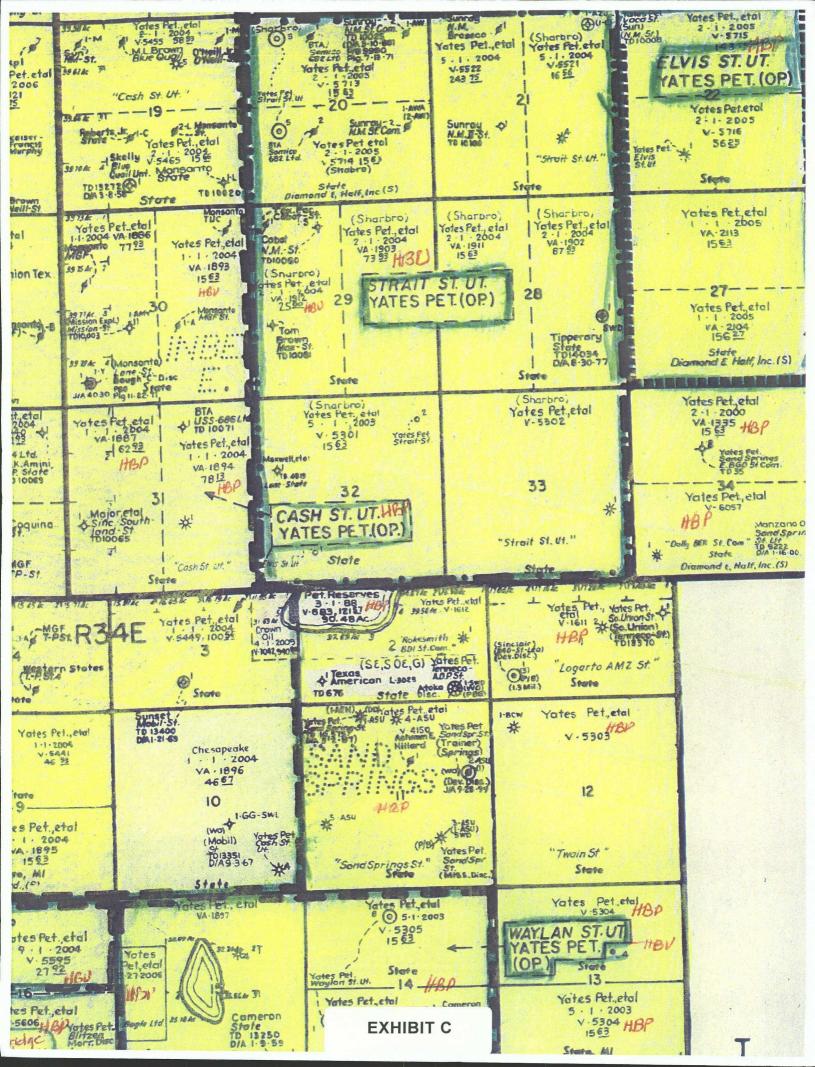


EXHIBIT A



Well File Search - Select API Number to View

Please select the API Number you wish to view from the list below by clicking the radio button next to the API Number. Then click the "Continue" button to see the thumbnails for the API you selected. The search results are broken out by groups of 25 on each page. Switching pages can be done by clicking the "Next 25" or "Previous 25" links.

23 R	ecords Found	Displaying So	creen 1 of 1	
0		ULSTR P -25-29N-11W Der: EATON A No. 001 RICA PRODUCTION COMPAN	Footages 790 FSL & 790 FEL Y	NT
0		L -25-29N=11W ber: SULLIVAN-No. 004 MB OIL & GAS INC	1450 FSL & 1045 FWL	N.,
0	3004507813 Well Name & Numb Operator: MANAN	J -25-29N-11W ber: SULLIVAN No. 001 A GAS INC	1600 FSL & 1450 FEL	- Bloomfield I=MN
5		E-25-29N-11W Der: PRE-ONGARD WELL No-00 NGARD WELL OPERATOR	1945 FNL & 660 FWL	·
0	3004507901 Well Name & Numb Operator: EL PAM	B -25-29N-11W Der: SULLIVAN No. 006 ICO INC	950 FNL & 1650 FEL	PC
Õ	3004507914 Well Name & Numb Operator: XTO EN	C-25-29N-11W ber: SULLIVAN-A No. 001 ERGY,-INC	790 FNL & 1850 FWL	-
0		G -25-29N-11W Der: PRE-ONGARD WELL No. 00 NGARD WELL OPERATOR	7750 FNL & 1600 FEL 08	
0		G~25-29N-11W Der: PRE-ONGARD WELL No. 00 NGARD WELL-OPERATOR	4640 FNL & 1580 FEL 06A	
0	3004523354 Well Name & Numb Operator: EL PAM	G -25-29N-11W ber: SULLIVAN No. 006B ICO INC	1650 FNL & 1580 FEL	PC
0	3004523757 Well Name & Numt Operator: MANAN	I -25-29N-11W ber: AUNT MAGGIE No. 001 A GAS INC	1675 FSL & 790 FEL	PC
0		Der: PRE-ONGARD-WELL_No. 00 NGARD_WELL-OPERATOR	1575 FSL & 790 FEL	
0		P -25-29N-11W Der: EATON COM B No. 001 RICA PRODUCTION COMPAN	1040 FSL & 790 FEL Y	no
Ô	3004524437 Well Name & Numl	B -25-29N-11W ber: EATON A No. 001E	1020 FNL & 1450 FEL	MV

	Operator: XTO ENERGY, INC		
6	3004524446 C -25-29N-11W	530 FNL & 1990 FWL	
1000	Well Name & Number: BRUCE-SULLIVAN COM E	3 No. 001	
	Operator: BP AMERICA PRODUCTION COMPA	NY	
O	3004524498 9 M-25-29N-11W	990 FSL & 810 FWL	
	Well Name & Number: SULLIVAN-A No. 001E		
<u> </u>	Operator:-XTO-ENERGY, INC		>
\odot	3004525094 J -25-29N-11W	1600 FSL & 1700 FEL	Fruitland Lan
	Well Name & Number: AUNT MAGGIE No. 003		1 run a
	Operator: MANANA GAS INC		
Ō	3004525744 L -25-29N-11W	1700 FSL & 510 FWL	
	Well Name & Number: RRE-ONGARD WELL No.	3	
	Operator: PRE-ONGARD WELL-OPERATOR		
\bigcirc	3004527546 C -25-29№-11W	730 FNL & 2180 FWL	
	Well Name & Number: SULLIVAN JB No. 001	×	
۲``	Operator: HOLCOMB OIL & GAS INC		
$\overline{\bigcirc}$	3004531894 P -25-29N-11W	985 FSL & 820 FEL	FC
	Well Name & Number: GHOSTRIDER No. 001		
•	Operator: EL PAMCO INC		_
Õ	3004532220 M -25-29N-11W	660 FSL & 695 FWL	-
	Well Name & Number: SULLIVAN No. 090		
	Operator: DUGAN PRODUCTION CORP		
\bigcirc	3004533223 L -25-29N-11W	1535 FSL & 1050 FWL	
	Well Name & Number: J B SULLIVAN No. 004Y	_	
	Operator: HOLCOMB OIL & GAS INC		
\odot	3004533224 C -25-29N-11W	680 FNL-& 1960 FWL	
	Well Name & Number: J B SULLIVAN No. 002		4.0
	Operator: HOLCOMB OIL & GAS INC		the upper
\odot	3004534457 J -25-29N-11W	1975 FSL & 2090 FEL	this well
	Well Name & Number: EATON A No. 001R		
	Operator: XTO ENERGY, INC		

23 Records Found

Displaying Screen 1 of 1

Continue Go Back