NSL

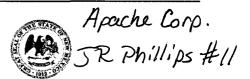
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



	ADMINISTRATIVE APPLICATION CHECKLIST 5914
TI	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
Applic	cation 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
	Check One Only for [B] or [C]
	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
	[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.
	CERTIFICATION: I hereby certify that the information submitted with this application for administrative eval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this cation 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.
Bruce	
	ew Mexico 87504 jamesbruc@aol.com e-mail Address

JAMES BRUCE ATTORNEY AT LAW

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(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

August 11, 2008

Hand Delivered

Mark E. Fesmire, P.E. Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule 104.F(2), Apache Corporation applies for administrative approval of an unorthodox oil well location for the following well:

Well Name:

J.R. Phillips Well No. 11

Well Location:

1310 feet FNL & 1310 FEL

Well Unit:

NE1/4NE1/4 of Section 1, Township 20 South, Range 36 East,

N.M.P.M., Lea County, New Mexico

The well will test the Monument-Paddock, Monument-Blinebry, and Monument-Tubb Pools. The pools are developed on statewide rules, with 40 acre spacing, and wells to be located no closer than 330 feet to a quarter-quarter section line.

The application is based on geologic and engineering reasons. A complete discussion, with exhibits, is attached as Exhibit A. The well is located equidistant from several existing wells. The well data shows that existing wells drain less than 40 acres. Therefore, the proposed location will recover undrained reserves.

Exhibit B is a land plat. The J.R. Phillips (fee) Lease, which has common ownership, covers the NE¼ of Section 1. No offset owner is adversely affected by the application, and notice has not been provided to anyone.

Please call me if you need any further information on this matter.

Very truly yours,

James Bruce

Attorney for Apache Corporation

Application of Apache Corporation for Administrative Approval of an Unorthodox Well Location

40 acres – 1310' FNL & 1310' FEL
Section 1, Township 20 South, Range 36 East, NMPM
Lea County, New Mexico

PRIMARY OBJECTIVES: Paddock, Blinebry, Abo

In support:

- 1. Apache Corporation is the operator of the proposed J.R. Phillips #10 well (Exhibit 1).
- 2. The pool rules that apply to the proposed location are the Monument; Paddock, the Monument; Blinebry, and the Monument; Abo pools. The proposed unorthodox location encroaches on spacing units B, G, and H. The working and royalty interests are common in all four spacing units (Exhibit 2). The production values posted in Exhibit 2, Exhibit 3, and Exhibit 4 represent cumulative Paddock, Blinebry, and Abo production respectively. The operator's working interest is 100% in all zones and all four offset proration units.



3. The proposed J.R. Phillips #10 location is necessitated by access to the largest undrained area common to all offset proration units.

a. Geology

The Paddock, Blinebry, and Abo are members of the Permian Leonardian aged carbonates of the central basin platform. The formations are a shallow marine carbonate consisting primarily of dolomite. Anhydrite can occur throughout the interval. Porosity and permeability are low. Wells are not generally capable of drainage of a full 40 acre spacing unit.

API					Cum Through 03/2008	Daily
30025	Op.	Well	Location	Pool	O/G/W	O/G/W
					(mbo/mmcfg/mbw)	(bopd/mcfgpd/bwpd)
04134	Apache	J.R.	660'FNL	Monument;	204.7/0/0	NA
		Phillips	660'FEL	Paddock,	15.3/0.130/6.1	4/3/1
		5		Monument;		
				Abo		
04135	Apache	J.R	751'FNL	Monument;	331.0/0.319/1745.1	37.4/201.6/558.6
		Phillips	1909'	Paddock		
		6	FEL			
04138	Apache	J.R.	660'	Monument;	112.5/0.143/388.1	39/155/0
		Phillips	FNL	Paddock,	3.1/0/0	NA
		9	360'	Monument;	27.4/0.026/9.1	NA
			FEL	Blinebry,		
				Eunice		
				Monument;		
				Grayburg-		
				San Andres		
04136	Apache	Phillips	1980'	Monument;	141.2/0.024/106.3	NA
		7	FEL	Paddock,	60.8/0.130/9.1	
			760'	Monument:		
			FNL	Abo		

One modern log, (Skelley "D" State 5 Sec 11) within section 1, was used to analyze pay throughout the Paddock interval. A structural map of the Paddock can be seen in **Exhibit 5**. Paddock economics justify completion of the J.R. Phillips #10 in not only the Paddock but the Blinebry and Abo as well. Due to the lack of modern logs through the Blinebry and Abo intervals, the given pay is unknown. This also leads to inconclusive drainage studies from these zones in offset wells. However, significant upside exists in completing the Blinebry and Abo

based upon production from these zones from other wells in the surrounding area.

- 1. Net Pay through the Paddock was read from a modern neutron-density log where cross-plotted porosity (XPOR) using a minimum of 5% and a maximum of 30%. Additionally, gamma ray (40 APIU in the Paddock) and water saturation (10%-50%, using a standard equation with a=1 and m=n=2) cutoffs were also employed.
- 2. Average porosity and water saturation was calculated for intervals meeting those criteria and was found to be 9.4% and 34% respectively.
- 3. Oil saturation is the additive inverse of water saturation

This analysis requires modern neutron-density and resistivity logs. Although water saturations can be adequately estimated from offset modern wells, many had to be excluded from analysis because of the vintage or type of porosity logs. This procedure has proved successful for Apache in recent drilling in this area.

b. Drainage

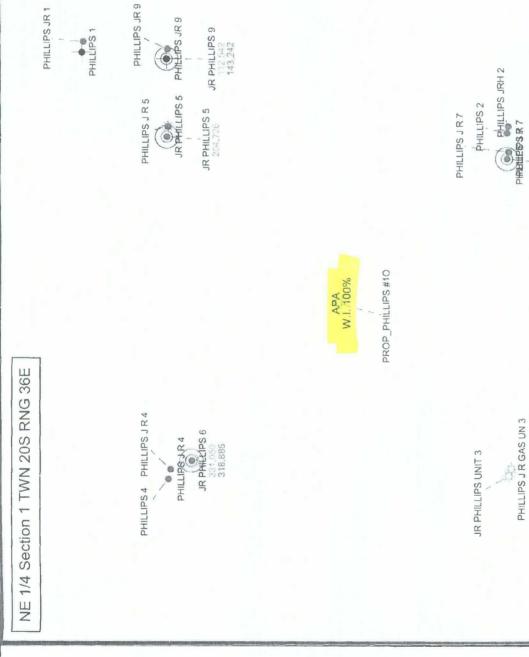
The following table calculates drainage areas based upon log interpretation of the Skelley "D" State 5 and forecasted estimated ultimate recovery of offset Paddock producing wells affected by the proposed J.R. Phillips #10.

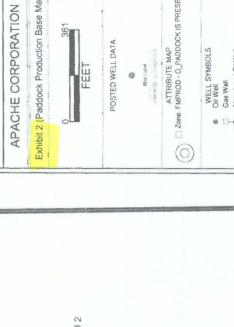
				H	Area	EUR	EUR	
Operator	Well	Location	Reservoir	Ft	A	MBO	MMCFG	
Apache	JR Phillips 5	660'FNL 660'FEL	Paddock	95	14.8	204.7	0.0	
Apache	JR Phillips 6	751'FNL 1909' FEL	Paddock	95	34.7	480.0	1.12	
Apache	JR Phillips 9	660' FNL 360' FEL	Paddock	95	8.1	112.5	0.143	
Apache	Phillips 7	1980' FEL 760' FNL	Paddock	95	10.2	141.2	.025	

Reserves for the proposed location were calculated by determining a field wide recovery factor based upon virgin Gas/Oil ratio (GOR) and cumulative GOR. Total net pay was 95 ft and was utilized in volumetric calculations. Drainage area was calculated by averaging field wide drainage areas and accounting for competitive drainage between offset producers. The reserves are as follows:

				H	Area	EUR	EUR
Operator	Well	Location	Reservoir	Ft	A	MBO	MMCFG
Apache	J.R. Phillips	1310' FNL	Paddock	95	10	138	0.322
_	#10	1310' FWL					

- 4. Notice the J.R. Phillips #10 encroaches the spacing within the proration unit of each of the aforementioned offset wells—each of which having produced from at least one of the proposed reservoirs being requested for development in the J.R. Phillips #10.
- 5. Approval of this application will afford interest owners in these spacing units opportunity to recover oil and gas which would not otherwise be recovered and to do so without violating correlative rights.
- **6.** The unorthodox location does not encroach on other parties outside of Apache corporation, therefore no party notification is required.





PHILLIPS 7

JR PHILLIPS 8 JR PHILLIPS 8

JR PHILLIPS 8



PHILLIPS JR 9 PHILLIPS JR 1 JR PHILLIPS 5 PHILLIPS JR 9 PHILLIPS 1 JR PHILLIPS 5 JR PHILLIPS 9 PHILLIPS JRH 2 PHILLIPS JR5 PHILLIPS 2 PHILLIPS JR7 PHILLIPS 7 PROP_PHILLIPS #10 NE 1/4 Section 1 TWN 20S RNG 36E JR PHILLIPS 8
JR PHILLIPS 8 PHILLIPS 4 PHILLIPS JR4 PHILLIPS JR GAS UN 3 PHILLIPS J R 4
JR PHILLIPS 6 JR PHILLIPS UNIT 3

APACHE CORPORATION

Exhibit 3 (Binebry Production Base Map)

POSTED WELL DATA

ATTRIBUTE MAP

ATTRIBUTE MAP

ATTRIBUTE MAP

GAS Well

Advise Producer

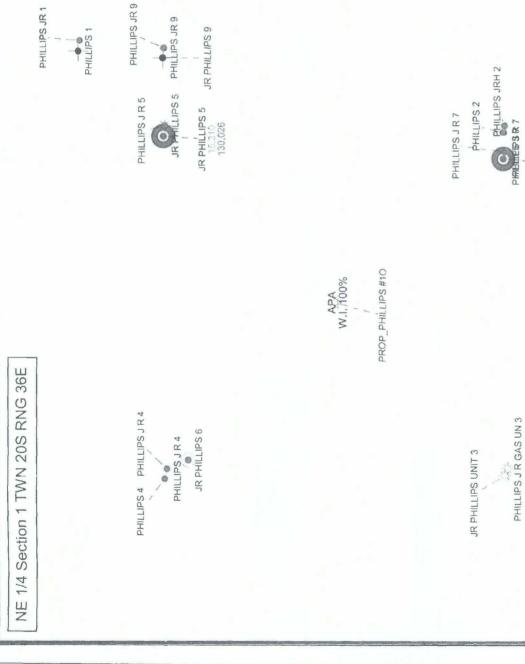
Advise Producer

Advise Producer

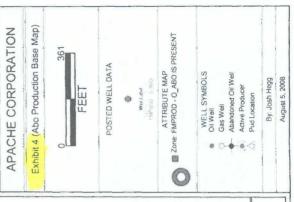
Advise Producer

By Josh Hegg

August 5, 2008

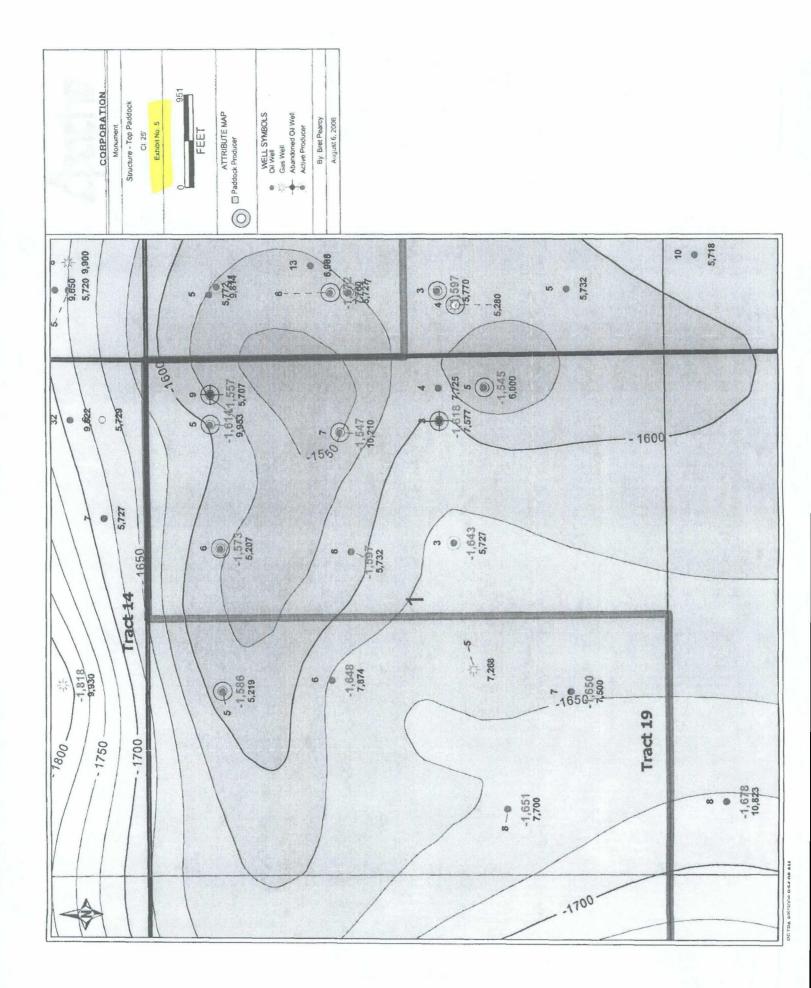


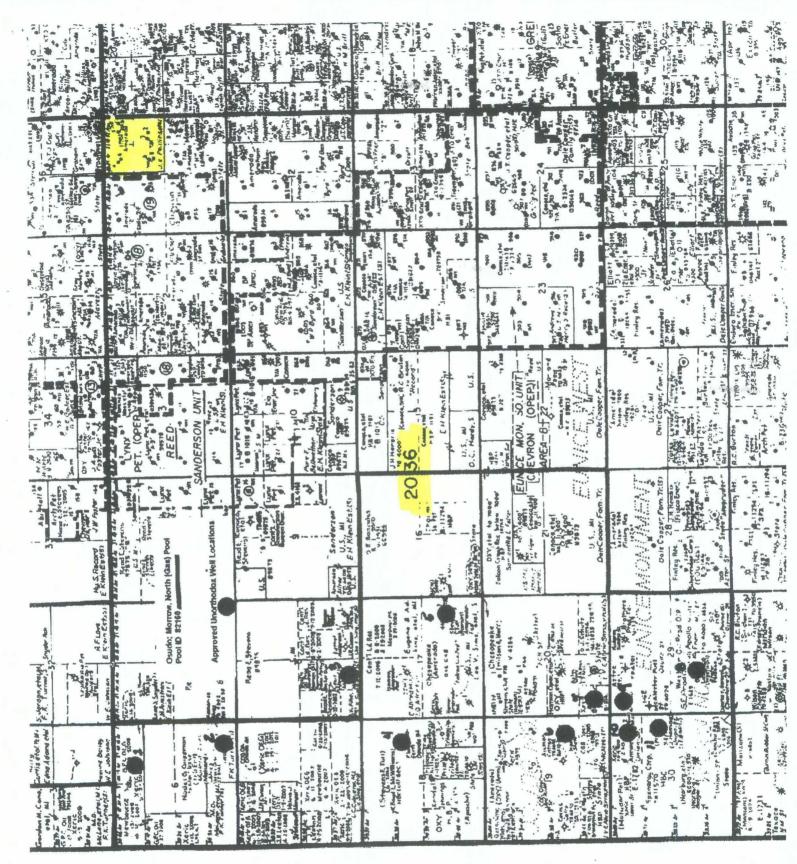




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