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		[D]				proval by BLM or S Public Lands, State Land Offi				
		[E]	For	all of the above	, Proof of Notif	fication or Publication	on is A	ttached, ar	nd/or,	
		[F]	🗌 Wa	ivers are Attach	ed					
3]	SUBMI	Т АСС	URATE	AND COMPL	ETE INFORM	IATION REQUIR	RED TO) PROCE	SS 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: Sta	itement must be completed by a	an individual with mai	nagerial and/or supervis	sory capacity.
Ocean Mund	5- Dry Ocean V	Number	attor ne	6-29-10
Print or Type Name	Signature		Title	Date
		v	omundsdr e-mail Address	yehollandhart, com



Ocean Munds-Dry Associate omundsdry@hollandhart.com

June 29, 2010

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 Cash "BNG" State Unit Well No. 3 located 1400 feet from the South line and 1605 feet from the West line of Section 18, Township 10 South, Range 34 East, N.M.P.M., Lea County, New Mexico.

Dear Mr. Fesmire:

Pursuant to the provisions of Division Rule 19.15.15.13, Yates Petroleum Corporation ("Yates") hereby seeks administrative approval of an unorthodox well location for its Cash "BNG" State Unit Well No. 3 located 1400 feet from the South line and 1605 feet from the West line of Section 18, Township 10 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The SW/4 of Section 18 will be dedicated to the well.

This location is unorthodox because it is governed by the Special Rules and Regulations for the Vada-Pennsylvanian Pool which provide for wells on 160-acre spacing to be located 150 feet of the center of a single governmental quarter-quarter section. The proposed location is unorthodox because it is outside the 150 foot window. A standard 160-acre spacing and proration unit comprised of the SW/4 of Section 18 will be dedicated to the well. **Exhibit A** is a revised C-102 as well as the previous C-102s filed for the well.

Yates originally drilled this well as a Missippian gas test. It was then plugged back and re-completed as an Atoka gas well. The well has now become uneconomic to produce and Yates would like to re-complete the well as a Vada-Upper Pennsylvanian oil well. It would be economic to test the Vada-Upper Penn zone in the existing wellbore rather than drill a new well and will avoid having to plug and abandon this well.

Yates also plans to test the Basal Abo and Wolfcamp (oil) formations which, if successful, will require 40-acre spacing. Therefore, Yates also seeks approval of a non-standard location for the Basal Abo and Wolfcamp formations.

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



Attached hereto as **Exhibit B** is a plat as required by Division rules. Yates is also the offset operator towards which the well is encroaching and working interest ownership is common in each spacing unit. Therefore, there are no affected parties as defined by Division rules 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,

Dean Munds-1

Ocean Munds-Dry CATTORNEY FOR YATES PETROLEUM CORPORATION

Enclosures

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

OCD - Hobbs

District 1 1625 N. French Dr., Hobbs, NM 88240 District H 1301 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

State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Number -025-3674			² Pool Code						
⁴ Property (Code				⁵ Property	Name		6 .	⁶ Well Number	
					Cash "BNG	G" State			3	
⁷ OGRID	No.				⁸ Operator	Name			⁹ Elevation	
02557	5		Yates Petroleum Corporation						4205	
	I				¹⁰ Surface	Location				
UL or lot no	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County	
К	18	10S	34E		1400	South	1605	West	Lea	
	1	L	¹¹ Bo	ottom Ho	le Location I	f Different From	m Surface		<u> </u>	
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County	
² Dedicated Acre 160	s ¹³ Joint o	r Infill ¹⁴ C	onsolidation	Code ¹⁵ Or	der No.	I				

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.

16				¹⁷ OPERATOR CERTIFICATION
				I hereby certify that the information contained 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 a mineral or working
				interest, or to a voluntary pooling agreement or a compulsory pooling
				order heretofore entered by the division.
				Clifte May 6/25/2010
				Signature Date
				Clifton May
				Printed Name
				¹⁸ SURVEYOR CERTIFICATION
				I hereby certify that the well location shown on this
V 5543				plat was plotted from field notes of actual surveys
i				made by me or under my supervision, and that the
				same is true and correct to the best of my belief.
				Refer to Original Plat
				Date of Survey
				Signature and Seal of Professional Surveyor:
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1625 N. French Dr., Hobbs, NM District II

State of New Mexico NM 88210 NM 88210 NM 88210

Form C-102 Revised October 15,2009 Submit one copy to appropriate District Office

District III JAN 1 9 2010 1000 Rio Brazos Rd., Aztec. NM 87410 District IV

1301 W. Grand Avenue, Artesia, NM 88210

HOBBSUCD

1220 South St. Francis Dr.

Santa Fe, NM 87505

AMENDED REPORT

1220 S. St. Francis Dr., Santa Fe, NM 87505 WELL LOCATION AND ACREAGE DEDICATION PLAT

30-			² Pool Code			³ Pool Na Wildcat; Atol				
⁴ Property C	Code				⁵ Property I	Name	·· <u>···································</u>		⁶ Welt Number	
37522	:				Cash BNG St	tate Com			3	
'OGRID I	No.			,	⁸ Operator I	Name	· <u>·····</u> ····		⁹ Elevation	
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² Dedicated Acres 320	¹³ Joint o	r Infill ¹⁴ C	onsolidation	Code ¹⁵ Or	rter No.	I	L			

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

16					¹⁷ OPERATOR CERTIFICATION
					I hereby certify that the information contained herein is true and complete to
					the best of my knowledge and belief, and that this organization either owns a
	ĺ				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 a mineral or working interest,
					or to a voluntary pooling agreement or a compulsory pooling order
,					heretofore entered by the division
					Alling 1/13/10
					Signature Date
					Allison Barton
					Printed Name
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					I hereby certify that the well location shown on this plat was
					plotted from field notes of actual surveys made by me or
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					under my supervision, and that the same is true and correct
				-	to the best of my belief
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					Date of Survey
					Signature and Seal of Professional Surveyor
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					Certificate Number

FROM : GENERAL SURVEYING CO 1625 H. French Dr., Hobbs, Mit 88840 DISTRICT II 811 South First, Artenia, NM 88210 DISTRICT III 1000 Rio Bresos Rd., Astec, NM 87410 DISTRICT IV 2040 South Pacheco, Santa Pe, NM 87505

FAX NO. : 5053930023

rgy. Minerale and Natural Resources Department

Jun. 29 2004 04:49AM P1

correct to the best of my ballef.

Revised March 17, 1989 instruction on back Submit to Appropriate District Office State Lease - 4 Copies Per Lease - 3 Copies

OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT API Number Pool Code Pool Name WILDCHT MISSISSIPPIAN Property Code Property Nam Well Number CASH STATE UNIT 3 OGRID No. Operator Name Rievation YATES PETROLEUM CORPORATION 025575 4205 Surface Location UL or lot No. Section Township Range Lot Ide Feet from the North/South Hae Feet from the East/West line County κ 18 SOUTH 105 34E 1400 1605 WEST LEA Bottom Hole Location If Different From Surface UL or lot No. Section Feet from the North/South line Township Range Lot Ida Feet from the East/West line County Dedicated Acres Joint or Infill Consolidation Code Order No. 317.924/2 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 the the information ntained herein is true and complete to the best of my knowledge and better. Signature 39.42 CLIFTON R. Printed Name REGULATORY AGENT Title 1-5543 129/04 41 Date SURVEYOR CERTIFICATION I haveby cartify that the well idention sh N.32*28'36.8" on this plat was plotted from field notes of W.103°30'26.4" netwol surveys made by me or under my N.889850.3 supervises, and that the same is irve and E.752119.4

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