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October 7, 2005

Mr. William Jones NM Oil Conservation Division 1220 South St. Francis Drive Santa Fe NM 87505

VIA FEDERAL EXPRESS

RE:

RESPONSE TO YOUR LETTER OF SEPTEMBER 16, 2005,

REGARDING DUKE ENERGY FIELD SERVICES:

C-108 APPLICATION FOR LINAM

Dear Mr. Jones:

Geolex, Inc. (Geolex) reviewed your correspondence dated September 16, 2005, regarding Duke Energy Field Services' (DEFS) application to inject (C-108) in Unit K, Section 30, T13S, R37E.

It is our understanding that the Commission will set this matter for hearing. DEFS counsel, Bill Carr (Holland and Hart) will contact your office to schedule a hearing and to determine its scope. With respect to your specific recommendations or questions regarding our application, we would like to address each of your points in this letter. We would ask that the information contained in this response be provided to the Commissioners along with your letter and the full application and made part of the hearing record. We can provide additional copies upon request.

1. Injection pressure limit calculation: Our Application for Authorization to Inject proposes (VII.3) that the wellhead injection pressure would range from 2700 to 2800 pounds per square inch (psi). As discussed in that section of our Application, we provided the information that the Specific Gravity (SG) of injection fluid would be approximately 0.8, as opposed to the SG of 1.04 for slightly saline water.

If the reservoir fluids in the target zone of the Lower Bone Springs are at hydrostatic equilibrium, the pressure gradient for water would be 0.433 psi/foot, yielding bottom hole pressures from 3767 psi to 3854 psi at the perforation zone of 8700 to 8900 feet. Using the OCD recommended overpressure of 0.2 psi/ft; this would allow 1740 psi to 1780 psi wellhead pressure for injection of water in this injection zone.

However, the injection fluid is acid gas, not water, and has a SG of approximately 0.8 as opposed to 1.0 for pure water. Therefore the proposed believing well does not have the same hydrostable pressure as a water-filled well. With no additional pressure at the wellhead the initial bottom hole static pressure for such a fluid would range from 3014 psi to 3083 psi at the 8700 to 8900 foot zone.

phone: 505-842-8000 fax: 505-842-7380 500 Marquette Avenue NW, Suite 1350 email: aag@geolex.com
Albuquerque, New Mexico 87102 email: aag@geolex.com
web: www.geolex.com

To correct the injection pressure to the lower SG of the acid gas, the formula would be:

Corrected Pressure = ((Hydraulic Gradient + Overpressure Gradient) – (Acid Gas SG x Water Hydraulic Gradient)) x Feet

Corrected Pressure = $((0.433 \text{ psi/ft} + 0.2 \text{ psi/ft}) - (0.8 \times 0.433 \text{ psi/ft})) \times \text{Feet}$

Corrected Pressure = (0.633 - 0.3463) x Feet

Corrected Pressure = $0.3166 \times Feet$

This yields corrected wellhead injection pressure of 2754 psi to 2818 psi for injection of acid gas at 8700 to 8900 feet. A step test will be performed to verify that the formation will not be fractured. We hereby request the Commission approve a requested wellhead injection pressure limit of 2750 psi, pursuant to a successful formation test.

2. Amendment of Application for Injection into Lower Bone Springs only: We would propose that the Commission approve our C-108 application for injection in the Lower Bone Spring. During drilling, we will test and evaluate the properties of the Brushy Canyon and/or other formations. If we determine that we would like NMOCD to consider the use of other formations, we will submit a separate application to inject for any other zones above the Lower Bone Spring.

3. Additional Notices:

- 3.1: Attachment A to this letter is the affidavit of publication for the permit application published by the *Hobbs News-Sun* on Tuesday, September 13, 2005.
- 3.2: Attachment B contains copies of return receipts of notification of operators in the affected area notified with original application on 9/13/05
 - Chevron, USA
 - Marathon Oil Company
 - Conoco Phillips Company
 - Amerada Hess Corporation
 - Southwest Royalties, Inc.
- 3.3: The surface owners of the land (State of New Mexico) has been notified of the filing of this application since we have been in negotiations for an easement for injection on the applicable lease. To assure that the State Land Office has all the information in the same form as NMOCD, we will provide a copy of the application (9/13/05), your letter of 9/16/05, and this response.
- 3.4 Mr. Jerry King of the NM State Land Office conveyed to us in our negotiations regarding the easement that the NM State Land Office would be contacting the existing grazing lessee with respect to the requirements for the surface easement.
- 3.5 Appropriate notice will be provided to the City of Hobbs and others.

Mr. William Jones October 7, 2005 Page 3

- 4. H₂S Contingency plans are in place for the Linam Ranch Plant; however, the contingency plan for the wellhead and pipeline will be developed and submitted when approval for the well if obtained and a permit application made for approval of the flow line from the plant to the wellhead. As I explained in our conversation, we have phased the project to accomplish work on an as-needed critical path basis, including following elements in the following sequence:
 - Obtain C-108 permit
 - Obtain NM SLO easement
 - Drill and test well
 - If well test favorable, design pipeline
 - Obtain pipeline permit
 - Conduct/complete well and pipeline according to final approved specifications
- 5. Composition of Injection Fluid: The injected fluid is acid gas from natural gas processing. Compositional analyses ranges for the acid gas stream from the Linam Plant were provided in the original application document in Section VII Supplemental Information for Section VII Injection Fluid Analyses. These ranges are based on the average of 17 individual compositional analyses over the last four years of operation, which can be provided upon request. None of the injected fluids are subject to regulation under Subtitle C of RCRA. These fluids are specifically exempted under the "petroleum exclusion" under RCRA. DEFS certifies that no wastes subject to RCRA Subtitle C will be disposed of in the proposed well.
- 6. Additional information on water content and tubing type. In the original application "Supplemental Information for Section VII Injection Fluid Analyses", we presented three sets of average analyses for the current acid gas at Linam Ranch. The first two are a dry basis and an actual wet or water saturated basis at the inlet or suction of the proposed compressor, which contains up to 12% water. The third set that we presented is the composition for the injection gas from the discharge or outlet of the compressor (wet gas composition discharge) with approximately 0.6% water. We intend to only inject dried gas (less than 1% residual water). For this reason, we would propose a similar system without plastic-coating in the tubing as you recommended to Agave Energy Company in your September 16, 2005, correspondence and as we use in the Artesia Duke AGI #1 already permitted by NMOCD.
- 7. Dry Gas Fluid Injection: As discussed in VII.3, the proposed wellhead injection pressure limit is 2750 psi. The temperature at the compressor aftercooler outlet, in the pipeline to the well, and at the wellhead will typically range from 60° to 100° Fahrenheit. Once the gas enters the tubing the temperature will increase further. Dehydration is accomplished by condensation, by cooling as the gas is compressed to intermediate pressures in the compressor. These facilities would be located at the Linam Plant facility. At these operating temperatures and pressures, the dew point for water would be approximately 30° Fahrenheit; normally 30 to 70 degrees below the injection temperatures. Normal compression practices will keep free water from occurring in the gas stream. The intermediate and outlet pressure and temperature would be monitored and controlled to prevent condensation. The compressor intercoolers and aftercooler would include

temperature control of the outlet gas and the injection line would have a pressure control valve to continuously maintain pressure control throughout the compressor.

- 8. Corrosion Protection: We do not plan to use plastic-coated tubing in this injection well. We do, however, plan to fill the annulus from the top of the packer (8700 feet) to the surface with diesel fuel to exclude water and protect the casing and tubing from corrosion. This is the same procedure recommended by you to Agave in your September 16, 2005, correspondence and used at the Duke AGI #1 in Artesia.
- 9. Recordkeeping and Reporting: DEFS will record continuous, recorded levels of pressure in the tubing and the annulus, and will record the injection rate. Copies will be provided to OCD on a quarterly basis.
- 10. Well bore 30-025-05519: The location we provided for the proposed injection well was approximate as a standard location. We do not propose to re-enter, use, or otherwise disturb the existing, plugged borehole 30-025-05519.
- 11. A revised well bore diagram is included as Attachment C. This well bore diagram is for schematic and specification purposes. Actual depths of completion, etc., to be determined after well is drilled and tested. The surface casing will be set well below the base of the Ogallala and properly cemented per NMSEO and NMOCD rules.
- 12. Well bore and Plugging diagram for the wells within the area of review were provided with the original application.
 - 12a: Well #30-025-05512 plugging records and diagrams are included (3 pages with plugging diagram) as Tab A in Section VI of the original 9/13/05 application.
 - 12b: Well #30-025-03976, as shown in the original application on Supplemental Map 1 for C-108 Section V: This well shown in its appropriate location in Section 25, T18S, R36E. This location is approximately ¼-mile outside the ½-mile radius area of review. For this reason, the plugging data for the well was not included in the original application; however, the data associated with the well is included in supplemental tabular information for Section VI (line 4, page 3 of table). Plugging data are included as Attachment D to this letter.
 - 12c: Well #30-025-21832: In our original application on the Supplemental Map 1 for C-108 Section V, this well is shown in its appropriate location in Section 31, T18S, R37E. This well is approximately ¼-mile outside the ½-mile radius area of review. For this reason, plugging data for this well is included in the supplemental tabular information for Section VI (line 19, page 3 of table). Plugging data available for this well have been attached as Attachment E to this letter.

Mr. William Jones October 7, 2005 Page 4

I trust this provides you with all of the additional data, information, and clarification needed to evaluate our application. Please contact me immediately if you have additional questions or concerns prior to the hearing.

Sincerely, Geolex, Inc.

Alberto A. Guttérrez, C.P.G.

President

AAG/lh

Enclosures

cc (w/enclosures): Joshua Epel, Esq. – DEFS

Mr. Chris Root - DEFS

William Carr, Esq. – Holland & Hart Hobbs District Office of NMOCD

D:\Projects\05-005\C108 Application\Response Letter and Attachments\jones003.ltr.doc

AFFIDAVIT OF PUBLICATION

State of New Mexico, County of Lea.

I, KATHI BEARDEN

Publisher
of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.
of1
Beginning with the issue dated
September 13 2005
and ending with the issue dated
September 13 2005
Publisher Sworn and subscribed to before
me this 13th day of
September 2005
Notary Public. My Commission expires February 07, 2009

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

OFFICIAL SEAL DORA MONTZ NOTARY PUBLIC STATE OF NEW MEXICO

My Commission Expires:

(Seal)

LEGAL NOTICE September 13, 2005

Application of Duke Energy Field Services, LP for Authorization to Inject, Lea County, New Mexico. Duke Energy Field Services, LP has filed an Administrative Application for Authorization to up to 2300 barrels per day of acid gas at a maximum pressure of 2800 psi into the Lower Bone Spring Formation between approximately 8700 and 9100 feet through Duke's proposed Linam AGI Well #1, to be drilled approximately 1980 feet from the south line and 1980 feet from the west line of Section 30, Township 18S, Range 37E, NMPM, Lea County, New Mexico. In addition, Duke Energy Field Service, LP will test the Brushy Canyon Member of the Delaware Group at approximately 5000' for consideration as a potential secondary injection target. The proposed well will be located approximately 4 miles west of Hobbs, in Lea County, New Mexico. Duke Energy Field Services, LP may be contacted through its representative, Mr. Alberto Gutierrez, 500 Marquette Avenue NW, Suite 1350, Albuquerque, New Mexico 87102 (505) 842-8000, Interested parties must file objections or requests for hearing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive; Santa Fe, New Mexico 87505 within fifteen (15) days. #21799

67101169000 67533247 GEOLEX, INC. 500 MARQUETTE AVE. NW SUITE 1350 ALBUQUERQUE, NM 87102

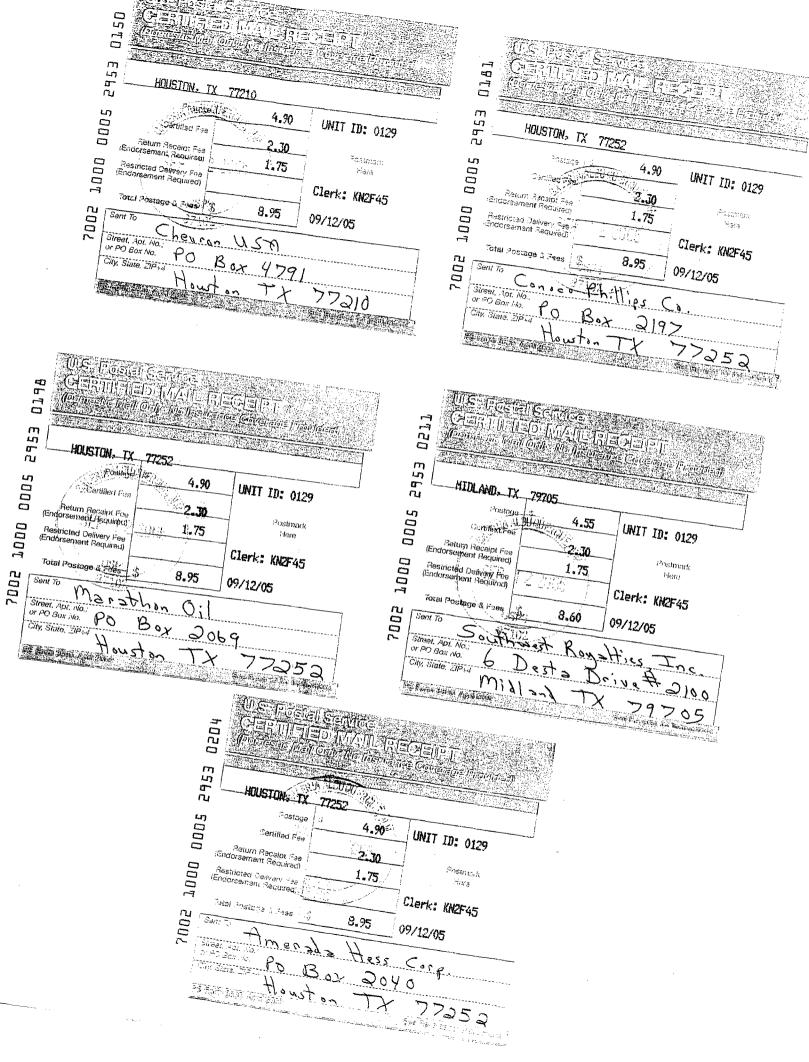
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so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	B. Received by (Printed Name) C. Date of Delivery GUY S. RUSSELL # 521
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DISTRIBUTION			Supersedes Old
SANTA FE	NEW MEXICO OIL CONS	ERVATION COMMISSION	C-102 and C-103 Effective 1-1-65
FILE	1		
U.S.G.S.	7		Sa. Indicate Type of Lease
LAND OFFICE	7		State Detent Fee
OPERATOR			5. State Oti & Gas Lease No.
SUND IDO NOT USE THIS FORM FOR RE USE "PAPPLICA	RY NOTICES AND REPORTS ON	WELLS ACT TO A DIFFERENT RESERVOIR. H PROPOSALS.)	
OIL SAS WELL SAS	OTHER-		7. Unit Agreement Name
2. Hane of Operator	al oil com	pany	8. Farm of Lease Name
3. Address of protect 4/00	Halle 71.70	rico	9. Weil No. 3 Formally
4. Location of Well	100	h 1980	10. Finld and Pool, or Wildeat
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	15. Elevation (Show whether 375	DF, RT, GR, egc.)	12. Cougy
	Appropriate Box To Indicate N		ner Data REPORT OF:
		3000E40EN1	ALPONT OF.
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PULL OR ALTER CASING	CHANGE PLANS	CASING TEST AND CEMENT JOB	
	(OTHER	
OTHER	L		
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APPROVED BY	Parameter Title		**** 1972
CONDITIONS OF APPROVAL DISAN	Supr.		DEC NO DIE
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HO, OF COPIES RECEIVED	7	•	•
DISTRIBUTION	NEW MEXICO OIL CONS	ERVATION COMMISSION	Form C-101
SANTAFE	-	•	Hevised 1-1-65
FILE	_		SA. Indicate Type of Leans
U.S.G.S.			51 State Oil & Gas Louis No.
LAND OFFICE	_		5. state Oil & On Loane fro.
OPERATOR			WINDSTONE TO THE STATE OF THE S
APPLICATION FO	OR PERMIT TO DRILL, DEEPEN,	OR PLUG BACK	
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Recommend	DEEPEN	PLUG BACK	Farmer
b. Type of Well	0021211		8. Farm of Leane Name
Well Mell Mell	OTHER	SINGLE MULTIPLE ZONE	Sortenen No 3 () 35
2. Name of Operator	C		9. Well No.
Continental Oil	Company		
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4. Location of well UNIT LETTER	G LOCATED 1980'	PEET FROM THE	(
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		19, Proposed Depth 19A, Forma	tion 20. Hotory or C.T.
<u> Tillillillillillilli</u>			
21. Devations (Show whether DE, R.I.		21B. Drilling Contractor	22. Approx. Date Work will start
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23.	PROPOSED CASING AN	D CEMENT PROGRAM	
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· - 1 Co smekes C	loss c cement	from 8500 up.	L to I 8500! Cale come top ent W/ 250 socks 8121,16121:581,621
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Jose C Comment	1 41'45', 50' and	- 7953 . Acid F	roce perta willow
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I hereby certify that the information abo	ove is true and complete to the best of my i	mowledge and belief.	
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Signed			Date
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CONDITIONS OF APPROVAL, IF CHE			DATE
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NMOCC (5) Fil	le		
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NEW CICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102 Supersedes C-128 Effective 1-1-65

-0 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc? If answer is "yes," type of consolidation . If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.)_ No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. certify that the well location shown on this plat was platted from field under my supervision, and that the same is true and correct to the best of my Date Surveyed Registered Professional Engineer and/or Land Surveyor Certificate No. 1320 1650 1980 2310 2640 2000

	PIES PECEIVES						4				
FILE U.S.G.S.		NE	W WEXICO O	IL CONSER	HOITAV	COMMISSION	FORM C-103 (Rev 3-55)				
TRANSPORTER	MISCELLANEOUS REPORTS ON WELL SOL										
SPENATION OF	The state of the s	(Submit	to appropriate [District Office	as per Cum	mission Rule 110	96) ; O				
Name of Com						7 PH 2 1					
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Date Work Pe	erformed	Pool Wildcat			County		30-				
			REPORT OF: (Check appropri							
Beginni	ng Drilling Operation	15 Casi	ng Test and Cem	ent Job	Other (F	explain):					
Pluggin	B	Reme	edial Work								
Detailed acc	ount of work done, na	iture and quantity of	materials used,	and results obt	ained.						
JOE		-19-62。	Position		Company						
	R. O. Dahars		Drlg. Po			intal Oil C	ompany				
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NEW MEXICO OIL CONSERVATION COMMISSION FORM C-103 (Rev 3-55) MISCELLANEOUS REPORTS ON WELLS (Submit to appropriate District Office as per Commission Rule 1106) Address Box 427 - Hobbs, New Mexico Continental Oil Company Section Township Well No. Unit Letter Range 36E 1 G 185 Goodwin etal 25 Pool Date Work Performed County Lea 8-10-61 THIS IS A REPORT OF: (Check appropriate block) Beginning Drilling Operations Casing Test and Cement Job Other (Explain): Remedial Work Temporarily abandoned Plugging Detailed account of work done, nature and quantity of materials used, and results obtained. Well was drilled to TD of 85821. No commercial productive oil formations were encountered. Well was temporarily abandoned on 8-10-61, by installing blind flange on head. Location suita le for TA only. A Form C-103, approved by NMOCC 8-23-61, specified that the status and future plans for this well must be reported every six months. At this time we have no plans to alter the status of this well. Another form C-103 will be filed on August 10, 1962, unless we develop additional plans prior to the filing. Position Drilling Foreman Witnessed by Continental Oil Company V. W. Davidson FILL IN BELOW FOR REMEDIAL WORK REPORTS ONLY ORIGINAL WELL DATA PBTD D F Elev. TD Producing Interval Completion Date Tubing Depth Tubing Diameter Oil String Diameter Oil String Depth Perforated Interval(s) Open Hole Interval Producing Formation(s) RESULTS OF WORKOVER Oil Production BPD Gas Production Date of Water Production BPD Gas Well Potential MCFPD GOR Test Cubic feet/Bbl Before Workover After Workover I hereby certify that the information given above is true and complete to the best of my knowledge. OIL CONSERVATION COMMISSION Approved by Title Position

Date

District Superintendent

Continental Oil Company

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Mail to	District Off	ice, Oil Com	scrvation Commissi	ion, to which For	a C-101	was sen	t not				\neg	
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AS WE	LL: The	production	n during the first 2	4 hours was		M.C.F. p	lus	barrels
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						-CBI 10790		APHICAL SECTION OF STATE)
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ALLACA SEPARALE SHEEL IF	ADDITIONAL SPACE IS NEEDED
as can be determined from available records.	a complete and correct record of the well and all work done on it so fa
	August 30, 1961
Company or Operator	AddressBox 427 - Hobbs; New Mend co
Name / Francisco	Position Title District Superintendent
More the way were	

NUMBER OF COP	ES ÉCEIVES												
BANTA FE													
F4L E.				NE	W MEXI	CO O	IL C	DNSER	MOITAY	COMMI	SSION		FORM C-103 (Rev 3-55)
LAND OFFICE	Ot)				MICCEL	LAM	Enii	C DED	ORTS O	M WE	116		(Kev 3-33)
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Name of Comp		ntina	ntal Oil	Company	,		Addres		1100 427. H	obbs.	New Man		15
Lease			110000 0000		ell No.	Unit	Letter		Township			inge	
GOOL	WIN E	TAL	25		1	1	G	25		18 S			36 B
Date Work Per	formed		Pool						County				
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After					+					 		+	···
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Date							Compa		trict Su	hat,TIII	Sugar		
							·	•	inental	Oil (Company		

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U.S.G.S.			⊣ "	ET MEAIC	, oir c	UNJEK	MOLIA	COMMISSION		FORM C-103 (Rev 3-55)
TRANSPORTER	OIL GAP		1	MISCELL	ANEDU	S REF	ORTS O	NELLS	EO	
OPERATOR	FICE		(Submi	t to appropria	ta Distric	office	-	umission Rule 1		7_2_63
Name of Com	pany				Addre	58	1961	du s A	6	?=3-61
		inental	Oil Compa		1	30x 42°	7, Hobbs,			
Lease Goo	dwin et a	1 25		Well No. U	nit Letter G	Section 25	Township		361	3
Date Work Pe 6-29-61	ríormed	Po	wildcat				County	Lea		
			THIS IS	A REPORT OF	: (Cbeck	appropri	ate block)			
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Pluggin	В		☐ Rea	nedial Work	•					
Detailed acco	unt of work d	one, natur	e and quantity o	of materials use	ed, and res	ults obta	uned.			
neat a	round sho cament @	e. Plu	ig down at	8:35 P.M.	6-29-63	L. Ra	n temper s	and 100 sad ature survey 30 min. T	r 6-3	Incor 30-61,
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Witnessed by			·····	Position			Company			
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<u> </u>	·		FILL IN BEL		AEDIAL V		EPORTS OF	NLY		
D F Elev.		TD		PBTD	- WELL	/A I A	Producing	Interval	Com	pletion Date
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Perforated In	erval(s)									
Open Hole int	erval				Produci	ng Form	stion(s)			· · · · · · · · · · · · · · · · · · ·
				RESULTS	OF WOR	OVER				
Test	Date of Test		Oil Production BPD	Gas Proc		Water I	Production PD	GOR Cubic feet/Bb		Gas Well Potential MCFPD
Before Workover										
After Workover										
	OIL CONS	ERVATIO	ON COMMISSION		I here to the	by certi	fy that the in my knowleds	formation given a	above	is true and complete
Approved by	Lest	; %	1/1/1	. L	Name	, 13	1 44			
Title	25-200		- com	· VALO	Positi	OB				
Date	······································	- · -			Compe	ıny.		strict Super	cint	endent
}			ئور	-	Cor	ntinen	tal 011	Company		

HUMBER SP C	OPIES RECEIVED		 						
PANTA FO			= ,,,	EW 1/EVICO	o., co	MEERI	W. T. ON.		
U.B.G.S.				EM WEXICO	OIL CO	M2EK	VALION	COWWI2210	N FORM C-103 (Rev 3-55)
THAMSPORTE	945			MISCELLA	NEOUS	REP	ORTS O	N WEBESO	FFICE OCC
CHERATOR	PPICE		(Submit	to appropriate	District	Office	as per Cum	mission Rule	
Name of Con		ntinen	tal Oil Comp	anv	Address			New Mexi	0 ;
Lease							Township.		Range
Go	odwin et	<u>_</u>		1 0		25	185		36E
Date Work P 6-24-61	erformed		Pool Wildcat			ľ	County	Lea	i
•			THIS IS	A REPORT OF:	(Check a	рргоргіа	te block)		
Beginn	ing Drilling O	perations	Cas	ing Test and Ce	ment Job		Other (E	xplain):	
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W				Position		······································			
V. W. D				Drilling 1	9		Company	tinental C	
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Company

District Superintendent

Continental Oil Company

Date

NEW M"TICO OIL CONSERVATION COMMIPTON Sauta Fe, New Mexico

Form G=101 Revised (12/1/55)

(Place) (Place) (Place) (IL CONSERVATION COMMISSION (INTA FE, NEW MEXICO) (Internal Oil Company (Company or Operator) (Company or)feet from ., NMPMCo
The status of plugging bond is. You are hereby notified that it is our intention to commence the Drilling of a well to be known as Continental Dil Company Company or Operator) Company or Operator)feet from ., NMPMCo
You are hereby notified that it is our intention to commence the Drilling of a well to be known as Continental Dil Company Goodwin at al 25 (Company or Operator) (Company or Opera)feet from ., NMPMCo
Continental Oil Company Goodwin at al 25 Company or Operator) Goodwin at al 25 Clease Clease Clease Applicate Company or Operator) Company or Ope)feet from ., NMPMCo
Control Cont)feet from ., NMPMCo
The status of plugging bond is Caltar Designation of Tax Tax Caltar)feet from ., NMPMCo
Fine of Section 22 T 13 R 32 IVE LOCATION FROM SECTION LINE) If State Land the Oil and Gas Lease is No. If patented land the owner is Mrs. Alm. Grodelia Address P.O. Box 17 Gobs, Now Mrs. Alm. Grodelia We propose to drill well with drilling equipment as follows: Rotary E F G H The status of plugging bond is District L K J I Drilling Contractor Cactus Drilling Contractor Of Tax PoO. Fox 348 San Argelo, Texas	fexcico
If State Land the Oil and Gas Lease is No. If patented land the owner is. Mrs. Alm. Genousia Address. P.O. BOX 17 . 1955s. Now Me propose to drill well with drilling equipment as follows: Rotary E F G H The status of plugging bond is. District L K J I Drilling Contractor Cactus Drilling Contractor On Tax PoO. FOX 348 San Aggelo. Texas	fextico.
If State Land the Oil and Gas Lease is No. If patented land the owner is. Mrs. Alice Geografic Address. P.O. Box 37 . 19508.3 Now Mrs. We propose to drill well with drilling equipment as follows: Rotary E F G H The status of plugging bond is. Oilciket L K J I Drilling Contractor Cactus Drilling Contractor of Tay P.O. FOX 348 San Aggelo, Rosas	fection
D C B A Address P.O. Box 17 Spbs. Men. Mrs. Alm. Grounds Address P.O. Box 17 Spbs. Men. Mrs. Alm. Grounds We propose to drill well with drilling equipment as follows: Rotary E F G H The status of plugging bond is bisrket L K J I Drilling Contractor Cactus Drilling Contractor of Tax PoO. Fox 348 San Argelo, Roxas	fextico
D C B A Address P.O. BOX 17 . 100003, New Me We propose to drill well with drilling equipment as follows: Rotary E F G H The status of plugging bond is	fextico
E F G H The status of plugging bond is bistaget L K J I Drilling Contractor Gactus Drilling Contraction of Tax PoOs Fox 348 San Angelo, Royas	
E F G H The status of plugging bond is blacket L K J 1 Drilling Contractor Gactus Drilling Contraction of Tax PoOs Fox 348 San Angelo, Texas	
The status of plugging bond is blacked: L K J 1 Drilling Contractor Cactus Drilling Content of Tay PoO. Fox 348 San Argelo, Royars	
L K J 1 Drilling Contractor Cactus Drilling Contention of Tay PoO. Fox 348 San Argelo, Repas	
P.O. Fox 348 San Argelo, Texas	
San Argelo, Texas	KAS.
***************************************	***********************
M N O P We intend to complete this well in the	
formation at an approximate depth of 6500	
CASING PROGRAM	
We propose to use the following strings of Casing and to cement them as indicated:	
Size of Hole Size of Casing Weight per Foot New or Second Hand Depth	Backs Cement
17-1/4" 13-3/6" 48 New 925 12-1/4" 9-5/8" 36 New 926(1)	250
	500
8=3/4* 7° 23 & 26 New 3501	1400

	WEI				RYATION C	•		Street	FORM C=1 Revised 5/1:
	SEE	INSTRUCTION			THIS FORM ON	THE RE	VERSE SIDE		
Operator				Legge	ON A	1981	JUN EO	PM	Yell You
•	NENTAL OIL C	OMPANY			GOODWIN ET		OUI 2()	Fit	1. 34
G.	Section 25	Township 18 So		Rac	**36 EAST	County	LEA		
	Location of Vell:								
1980	feet from the	NORTH	line and		leet	from the	EAST		line
Ground Level E	}	Formation		Pool				Dedic	isted Acresse:
	Abo			Wi	ldcat			L	40 Ac
. If the answe	r to question two i	a 'BO, ' list a	il the owners	and theu	Land Descript		7 :		
		SECT	ION B				7	CERT	TIFICATION
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COUNTY LEA FIELD	Goodwin	STA	ATE NM MN O	3976
OPR CONTINENTAL OIL CO			MA	P
3 Goodwin				
Sec 25. T-18-S. R-	36-E		co.o	RD
1980' FNL, 1980' F	EL of Sec			
Re-Spd 8-17-72		CLASS		
Re-Cmp 11-13-72	FORMATION	DATUM	FORMATION	DATUM
csg a sx . Tubing 13 3/8" at 332' w/550 sx 9 5/8" at 2925' w/760 sx 5 1/2" at 8025' w/250 sx				
LOGS EL GR RA IND HC A				
TEMPODARTI V A SANDONED	TD 8582':	PED 7920'	·	

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CONT. PROP DEPTH 8500 Type WO

F.R. 7-31-72; Opr's Elev. 3761' DF
PD 8500' WO (Drinkard)
(Orig. Continental Oil Go., #1 Goodwin "25",
PSA 4-20-62, OTD 8582')

8-21-72 TD 8582'; PBD 7988'; WOC
CO to 8029'
Ran 5 1/2" csg

8-28-72 TD 8582'; PBD 7988'; Swhg
Perf @ 7791', 7796', 7815', 7819', 7824';
7840', 7863', 7887', 7893', 7897', 7936',
7940', 7944', 7949', 7952' w/i SPI
Acid (7791-7952') 18,000 gals (28% NE)
Swbd 17 BO + 706 EW in 29 hrs

9-5-72 TD 8582'; PBD 7920'; Swbg
Swbd 7 BO + 198 EW in 10 hrs (7791-7952')
Sq.zd 7936-52' w/100 sx
Swbd 115 EF w/trace oil in 4 hrs (7791-7897')

LEA CONTINENTAL OIL CO. Goodwin 3 Goodwin NM Sec 25, T18S,R36F Page #2

TD 8582'; PBD 7920'; SI TD 8582'; PBD 7920'; TEMPORARILY ABANDONED COMPLETION REPORTED

11-18-72

Source Of Som Letter Operators Sundamental Control Sundamenta	LAND OFFICE OPERATOR SUNDR IDO NOT USE THIS FORM FOR PRI OIL GAR WELL CO 2. Name of Operator F. C. Box 460, Hob 4. Location of Well G 1	other Dry C mpany		S COIFFERENT RESERVOIR. SALS.)	5, State Oil 6 Gas Lec
Dry Completion Completion Company	2. Continental Oil Co. 3. Address of Cherator F. C. Box 460, Hob 4. Location of Well G 1	other Dry C mpany		S L DIFFERENT RESERVOIR. SALS.)	
OTHER OF PROPERTY AND THE STATE OF SET 9 3130° TOTHER OF PROPERTY AND THE STATE OF SET 9 3130° FERF PLUGS: SET 50 SX CLASS "C" CMF PLUG IROM 4735° - 4658', 50 SX W/ 1004 CACL IN & OUT OF 9 5/8" CSG FROM 3137 - 3049'. SET CIPF IN 9 CLASS "C" CMF PLUG FROM 1,000' - 940'. SET 25 FLUG & 370' - 340'. SET 10 SX CMT PLUG FROM 10.00'. SET 25 FLUG & 370' - 340'. SET 10 SX CMT PLUG FROM 10.00'. SPORT SET 25'. FRISTIL 260. PLUG AND 1.00'. SET 25'. FRISTIL 260. PLUG AND 1.00'. SET 25'. FRISTIL 260. PLUG & 300'. SET 25'. SET 20'. SET 25'.	2. Continental Oil Co. 3. Address of Operator F. O. Box 460, Hob	other- mpany	omplewion		1.7 Unit Agreement Nor
Continental Oil Company State Bi Allocation of Well G 1980 No. 1 1980 Line Section Line Section Check Appropriate Box To Indicate Nature of Notice, Report or Other Data Notice of Intention to: Subsequent Report of: Check Appropriate Box To Indicate Nature of Notice, Report or Other Data Notice of Intention to: Subsequent Report of: Check Appropriate Box To Indicate Nature of Notice, Report or Other Data Notice of Intention to: Subsequent Report of: Change Plans	3. Address of Operator 460, Hob 4. Location of Well G 1				
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INSTRUCTIONS

This from is to be filed with the appropriate District Office of the Commission not later than 20 days after the completion of dry newly-drilled or imperced well. It shall be accompanied by one popy of all electrical and radio-activity logs run on the well and a summary of all special tests continued, including drill seem tests. All depths reported shall be measured depths, in the case of directionally drilled wells, true vertical depths shall also be reported. For multiple completions, Items 30 through 34 shall be reported for each zone. The form is to be filled in quintuplicate except on state land, where six copies are required. See Bule 1105.

INDICATE FORMATION TOPS IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE

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FORMATION RECORD (Attach additional sheets if necessary)

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NO. OF COPIES RECEIVED			Form C-103
DISTRIBUTION			. Supersedes Old
SANTA FE	NEW MEXICO OIL CONS	SERVATION COMMISSION	C-102 and C-103 Effective 1-1-65
FILE			116
U.S.G.S.		•	Sa. Indicate Type of Lease
LAND OFFICE			State X Fee.
OPERATOR			5. State Oil & Gas Lease No.
<u> </u>			
SUNDEN	NOTICES AND DEPORTS ON	LWELLS	mmmmmm -
(DO NOT USE THIS FORM FOR PROP	NOTICES AND REPORTS ON DEALS TO DRILL OR TO DEEPER OR PLUG (N FOR BUT - " (FORM C-101) FOR SU	BACK TO A DIFFERENT RESERVOIR.	
l.	N FOR PERMIT E- (FORM C-101) FOR BU	LR PROPOSALS.)	7, Unit Agreement Name
OIL GAS WELL	aruse there had a manada		
2. Name of Operator	other Dry hole pendir	ig further testing	A. Form or Leane Name
			state B-31 No. 1
Continental Oil Comp 3. Address of Operator	any	·	Formerly-Conocestate 9. Well No.
. Address of Operator			9, 4611 140,
P. O. Box 460, Hobbs	New Mexico		<u> </u>
Location of Well	_	_	10. Fleid and Pool, or Wildcat GOOdwin Field Drinkard Pool FROM
UNIT LETTER G	180 FEET FROM THE North	LINE AND 1980 PEET	FROM Drinkard Pool
			llillillillilli
THE East LINE, SECTION	31 TOWNSHIP 18S	RANGE 37E	MINIMINI MAN
	15. Elevation (Show whether	DF, RT, GR, etc.)	12. County
	3739 GL		Iea (IIIIIIII
6. Check A	ppropriate Box To Indicate N	Nature of Notice, Report of	Other Data
NOTICE OF INT			ENT REPORT OF:
		1	
PERFORM REMEDIAL WORK	PLUG AND ABANDON	REMEDIAL WORK	ALTERING CASING
TEMPORARILY ABANDON	_	COMMENCE ORILLING OPNS.	PLUG AND ABANDONMENT
	اسا		
	CHANGE DIANS 1	CASING TEST AND CEMENT ION	
PULL OR ALTER CASING	CHANGE PLANS	CASING TEST AND CEMENT JOB	
<u></u>		BDL THEMSO DE TEST PRICES	
other Assume Operation			
OTHER ASSUME Operation	s, PB & Complete X	OTHER	uding estimated date of starting any proposed
other ASSUME Operation 17. Describe Proposed or Completed Oper work) SEE RULE 1003.	S. PB & Complete X	OTHER	
Continenta Pennzoil Oil Company a TD of 11,675' and It is our Pennzoil Oil Company tained all rights ab in the Drinkard form (2) Run Drill Stem t complete; (3) Set pl (4) Run DST's in Cle casing, perforate, t	s, PB & Complete x ations (Clearly state all pertinent det 1 0il Company proports Conoco State Wel determined to be dr intentions to assum thange the name to ove 7700' in our Fa ation using the fol est in Drinkard, se ugs opposite Drinka arfork formation an	ails, and give pertinent dates, includes to assume open and plugged back to operation of the contract, where the state B-31 No. In the contract, where the state B-31 casing, and perforation, ind, if productive;	rations of the been drilled to k to 7112'. is well from 1 and since we ree plan to complete (1) Run microlog; if productive, and f not productive; (5) Run 4 1/2"
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NO. OF COPIES RECEIVED	<u> </u>		Form C-103
DISTRIBUTION			Superseded Old C-102 and C-103
SANTA FE	NEW MEXICO OIL CO	SERVATION COMMISSION	Effective 4-1-69
FILE	<u>.</u>		
U.S.G.S.	4		Sa. Indicate Type of Lease
LAND OFFICE	_		State X Fee.
OPERATOR	_		5, State Oil & Gas Lease No. B-1535\(\frac{1}{2} \)
SUND	RY NOTICES AND REPORTS O	N WELLS	
(DO NOT USE THIS FORM FOR P	ROPOSALS TO ORILL OR TO DEEPEN OR PLUI ATION FOR PERMIT -" (FORM C-101) FOR S	BACK TO A DIFFERENT RESERVOIR. UCH PROPOSALS.)	
OIL GAS WELL	OTHER. Drilling Wel	1.	7. Unit Agreement Name
2. Name of Operator			8. Farm of Lease Name
PENNZOIL COMP.	ANY		Conoco-State
3. Address of Operator 1007 Midland	Savings Building, Mi	dland, Texas 79701	9. Well No.
4. Location of Well			10. Field and Pool, or Wildcat
UNIT LETTER G	1980 PERT PROM THE NOTE	h LINE AND 1980 FEET FROM	Wildcat
222#	31 10	-S 37-E	
THE east LINE, SECT	TION 31 TOWNSHIP 18	RANGE 37-11 NMPM	
animinininini	15. Elevation (Show wheth	er DF, RT, GR, etc.)	12. County
	3740 GL		Lea
16. Check	Appropriate Box To Indicate	Nature of Notice, Report or Ot	her Data
	INTENTION TO:		T REPORT OF:
PERFORM REMEDIAL WORK	PLUG AND ABANDON	REMEDIAL WORK	ALTERING CASING
TEMPORARILY ABANDON		COMMENCE DESILLING OPHS.	PLUG AND ABANDONMENT
PULL OR ALTER CASING	CHANGE PLANS	CASING YEST AND CEMENT JOB X	
	_	OTHER	
OTHER			
17. Describe Proposed or Completed	Operations (Clearly state all pertinent of	etails, and give pertinent dates, including	estimated date of starting any proposed
work) SEE RULE 1703.			, , ,
enudded 17km	hole 12:00 noon 7-31	-66	
_		00.	
Drilled to 38		t- 2021	
		ing to 362' and cemen	nted to surrace
	s. Plug down at 3:5		
_		m. 8-1-66. Held o.k	•
Drilled 12¼"	hole to 3130' on 8-6	-66.	
Ran 101 jts 9	-5/8", 32.3# & 36# C	-55 casing to 3129'.	Cemented
w/385 sacks P	ozmix and 150 sacks	neat. Plug down at	8:45 p.m. 8-6-66.
		ent behind 9-5/8" cas	
		ites at 10:00 a. m. 8	
rested casing	w/1500# 101 50 M1M	ces at 10.00 a. m. 0	, oo. nerd oin.
18. I hereby certify that the information	on above is true and complete to the ber	t of my knowledge and belief.	
///	1		
SIGNED	soluck me I	rilling Superintende	nt 8-17-66
APPROVED BY	TITLE		DATE
CONDITIONS OF APPROVAL, IF AN	ıY:	-	

NO. OF COPIES RECEIVED :						
DISTRIBUTION SANTA FE	NEW	MEXICO OIL CONSE	RVATION COMMIS	SION	Form C-101 Revised 1-1-	85
FILE	 		- Cu	(.	SA. Indicat	Type of Lease
U.S.G.S.	+			1 63 Aleca	STATE	X res
LAND OFFICE	 			ំ ខិត្	.5. State OIL	& Gas Lease No.
OPERATOR					B-153	35 ½
					THIT	mmmini
	N FOR PERMIT TO	DRILL, DEEPEN,	OR PLUG BACK			
is. Type of Work					7. Unit Agre None	ement Name
DRILL X		DEEPEN	PL	UG BACK		-
b. Type of Weil			SINGLE T	MULTIPLE	8. Form or L	
OIL WELL GAS WELL 2. Name of Operator	OTHER		ZONE	ZONE	9. Well No.	:o-State
	ID A NIV				1	
PENNZOIL COM 3. Address of Operator	EWAT				10. Field on	id Pool, or Wildest
1 · ·	Savings Bui	lding			Wilde	
4. Location of Well		1000	1	N	iiiiii	mmmini
			EET FROM THE	LINE		
AND 1980 FEET FROM	THE Bast LIN	E OF SEC. 31	18-S	37-E		
					12. County	
					mm	HHHHH
	HHHHHH		9. Proposed Depth	19A. Formation	7777777	20, Rotary or C.T.
			L3,000	Ellenbu		Rotary
21. Elevations (Show whether DF,	RT, etc.) 21A. Kind		B. Drilling Contract			. Date Work will start
3740 G.L.	Blan	ket	Ard Drilli	ng Company	y 7-	-30 - 66
23.	Р	ROPOSED CASING AND	CEMENT PROGRA	M		
SIZE OF HOLE	SIZE OF CASING	WEIGHT PER FOOT	SETTING DEP	TH SACKS OF	CEMENT	EST. TOP
175	13-3/8	48	375	400		Circ.
124	9-5/8	36	3300	700		2000
8-3/4	5-1/2	17 & 20	13,300			o bring cmt
'		I	•	to bot	tom of	inter. csg.
			ATPACOV FOR 90 D DRILLING	ALL CHESS AND CHESS TOWNENCED,		
IN ABOVE SPACE DESCRIBE PRITIVE ZONE. GIVE BLOWOUT PREVENTE	R PROGRAM, IF ANY.		PLUG BACK, GIVE DAT			AND PROPOSED NEW PRODUC
Signed -	Ladie !	Title Drilline	g Supt.		. J ul	ly 21, 1966
		1 :(!e			ate Ju.	
(This space for S	tate Use)					
APPROVED BY		TITLE	<u></u>		ATE	
CONDITIONS OF APPROVAL, IF	ANV					

NEW BLA LO OIL CONSERVATION COMMISSION

WELL LOCATION AND ACREAGE DEDICATION PLAT

Superior (18 Cop. 3)

18-5 1980 WILDCAT ELLENBURGER 1. Outline the acreage delicated to the subject well by colored pencil or he foremarks to be 2. If more than one least is distracted to the well, outline each and acceptable the ownership is and floath as to working interest and recalities. 3. If more than one lease of different was rship is dedicated to the win horse an express of at was as been consults. dated by communitization, aritical on force qualific ex-It insures "yes," type of consolitation If answer is "not" lost the corners and tract descriptions which have actually been consolidated the coverse of heaf this form if necessary.._ No allowable will be assigned to the well until all interests base in a consolidated shy commutative lost antilization, forced-produce, or otherwise to most a non-standard unit of auton-PENNZOIL GULF

COUNTY - 1EA	EA FIELD Wildcat		STATE N		
OPR TOTAL OUT	L OUT COMPANY		MAP		
<u> </u>					
Sec. 31, 2-18-5, R-37-E		CO-ORD			
1980° UNI, 1980° SEL of 346.		MN 01832			
35331-66		CLASS		4	
<u>Cmp 10-6-66</u>	FORMATION	DATUM	FORMATION	DATUM	
CSG & SX - TUBING				ļ	
1.5 5 5 5 361 361 361 9 7 5 5 313 336					
LOGS EL GR RA IND HC	10 11675*			1	
ELUCIED & AFANDOMED			···		

CONT. 10WB Drlg. Co. PROP DEPTH 13.000° TYPE

E.R. 8-4-66; Opr's Elaw. 3739' GL FL 13,800° - Ellenburger Contt. - Lowe Drig. Co. AMEND OPERATOR & LEASE DESIGNATION: Formerly 10-30-66 FENNZOIL COMPANY, #1 Conoco-State.
TD 31303, WOO.
Drig. 59083 im & sd.
Drig. 78905.
Drig. 88364. 8-5-66 8-15-66 8-21-66 8-29-66 DSE 839:-84837, open 1 hr, rec 2407 DM, 2707 MG Salt Wtr + 907 Sli GC Sul Wir, 1 br ISEF 3230#, FP 33-304#, 1 br FSEF 2972#, MP 3825-3805#. DST 8721-8756*, open 1 br, rec 370* Sul Wtr CM + 7381* Salty Sul Wtr, 1 br ISEP 3425#, FP 446-3402#,

1 by 3875 3423#.



ConocoPhillips Company 4001 Penbrook Odessa, TX 79762 Phone 432-368-1266

NMOCD

1220 South St. Francis Drive Santa Fe, New Mexico 87505 VIA FED EX

RETURN RECEIPT REQUESTED

- marchine com To the State of

S 500.

RE:

ConocoPhillips Objection to

Administrative Application of Duke Energy Field Services, LP (Duke)

For Authorization to Inject Lea County, New Mexico

115

Dear Sir or Madam:

ConocoPhillips objects to the injection of acid gas as proposed by Duke in their attached letter of September 10, 2005. Duke proposes to inject in either the Lower Bone Springs Formation (primary horizon) at 8700 to 9100 feet or the Brushy Canyon Formation (secondary horizon) at 5000 to 5300 feet. There are many wells drilled through the Brushy Canyon in this area which could pose a communication risk for the disposed acid gas in either these wells or future wells to be drilled to the productive horizons below 5300 feet. Therefore, ConocoPhillips objects to injection in the Brushy Canyon Formation. In addition, ConocoPhillips requires more time to investigate injection of acid gas in the Lower Bone Springs relative to its impact on our offsetting leasehold. Therefore, we must also object to injection of acid gas into the Lower Bone Springs at this time.

Questions about these objections can be directed to Tom Atkins at 832-486-2642 or to the undersigned at 432-368-1670.

Sincerely,

Judith E. Roper ConocoPhillips

Attachment – Duke's Notification Letter

Xc: Alberto A. Gutierrez via Facsimile 505-842-7380

Consultant to Duke Energy Field Services, LP



RECEIVED

SEP 1 5 2005

Alberto A. Gutiérrez, C.P.C.

September 10, 2005

M-ABU - LAND

Conoco Phillips Co. PO Box 2197 Houston TX 77252

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE:

ADMINISTRATIVE APPLICATION OF DUKE ENERGY FIELD SERVICES, LP FOR AUTHORIZATION TO INJECT, LEA COUNTY, NEW MEXICO

To Whom It May Concern:

This letter is to advise you that Duke Energy Field Services, LP, (Duke) has filed the enclosed application with the New Mexico Oil Conservation Division (NMOCD) seeking administrative authorization to inject up to 2300 barrels per day of acid gas at a maximum pressure of 2800 psi into the Lower Bone Spring Formation between approximately 8700 and 9100 feet through Duke's proposed Linam AGI Well #1, to be drilled approximately 1980 feet from the south line and 1980 feet from the west line of Scction 30 Township 18S Range 37E, NMPM, Lea County, New Mexico. In addition, Duke will test the Brushy Canyon Member of the Delaware Group at approximately 5000' for consideration as a potential secondary injection target. The proposed well will be located approximately 4½ miles west of Hobbs, New Mexico.

Pursuant to NMOCD requirements, any objections or request for hearing must be filed with NMOCD, 1220 South St. Francis Drive; Santa Fe, New Mexico 87505 within fifteen (15) days of the date of this letter.

Sincerely, Geolex, Inc

Alberto A. Gutiérrez C.P.G.

President

Consultant to Duke Energy Field Service

AAG/lh

Enclosures

cc (w/o enclosures):

Joshua B. Epel, Assistant General Counsel - DEFS

D:\Projects\05-005\C108 Application\Conoco permit letter.doc

email: aag@geolex.com web: www.geolex.com

phone: 505-842-8000 fax: 505-842-7380