BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF POGO PRODUCING RECEIVED COMPANY FOR TWO UNORTHODOX OIL WELL LOCATIONS, EDDY COUNTY PER 26 1995 NEW MEXICO

Oil Conservation Division

Pogo Producing Company hereby makes application for an order approving two unorthodox oil well locations, and in support thereof states:

- 1. Applicant is the operator of the S½NE¼, NW¼, and S½ of Section 28, Township 24 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.
 - 2. Applicant proposes to drill the following wells:
 - (a) The Cedar Canyon 28 Fed. Well No. 1, at a location 230 feet from the North line and 2510 feet from the West line of the Section. The NE%NW% of Section 28 will be dedicated to the well; and
 - (b) The Cedar Canyon 28 Fed. Well No. 2, at a location 2410 feet from the North line and 2310 feet from the East line of the Section. The SW¼NE¼ of Section 28 will be dedicated to the well.

Each well will be drilled to a depth sufficient to test the Bone Spring formation (First Bone Spring zone) and the Delaware formation (Undesignated Cedar Canyon-Delaware Pool).

3. The locations of these two wells are based on topographic reasons, and applicant is also submitting applications for administrative approval of the well locations. However, due to an expiring lease applicant is setting these location requests for

hearing in the event of an objection by offset operators or lessees.

4. The granting of this application is in the interests of conservation and the prevention of waste, and will prevent the drilling of unnecessary wells.

WHEREFORE, Applicant requests that, after notice and hearing, the Division grant the relief requested above.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Post Office Box 2068

\$anta Fe, New Mexico 87504-2068

(505) 982-4554

Attorneys for Applicant

cedrcan.app