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NEW MEXICO OIL CONSERVATION DIVISION

		- Engineering Dureau -							
		ADMINISTRATIVE APPLICATION COVERSHEET							
-	THIS COVE	ERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS							
Applic	[P	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] C-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] Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]							
[1]	TYPE OF APPLICATION - Check Those Which Apply for [A]								
	[A]	Location - Spacing Unit - Directional Drilling NSL DNSP DD DSD JUL 17 1998							
	Check	One Only for [B] or [C]							
	[B]	Commingling - Storage - Measurement DHC DCTB DPLC DPC DOES DOEM							
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD IPI EOR PPR							
[2]	NOTIFICAT	TION 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]	INFORMAT	TION / DATA SUBMITTED IS COMPLETE - Statement of Understanding							

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I further verify that all applicable API Numbers are included. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

JAMES BRUCE P.O. BOX 1056						
SANTA FE, NM 87504						

Print or Type Name

Signature

JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

July 17, 1998

Hand Delivered

Michael E. Stogner Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Pursuant to Division Rule 104.F.(2), KCS Medallion Resources, Inc. applies for administrative approval of an unorthodox gas well location for the following well:

PDM Well No. 1 860 feet FSL & 660 feet FWL W½ §16, Township 19 South, Range 29 East, NMPM Eddy County, New Mexico

Attached as Exhibit A is a Form C-102 for the well. The well will be drilled to approximately 11,500 feet, to test the Morrow formation (Turkey Track-Morrow Gas Pool). Well spacing is 320 acres, with wells to be located no closer than 1650 feet to the end line and 660 feet to the side line of the unit.

Attached as Exhibits B and C are net isopach maps of the Morrow "A" and "B" Sands, respectively. The maps show that it generally takes more than 10 feet of net Morrow Sand to have a productive well: Most wells in the area that have 10 feet or less of porous sand are not commercial. The general trend of the Morrow formation in this area is northwest-southeast. The well could conceivably be moved further north of the proposed location, but that would place it too near the well in the SE¼NW¼ §16, which produced 1.5 BCF of gas before the Morrow was abandoned in 1995. Moving the well east from the proposed location increases the chances of encountering thinner and less porous sand. (The well in the SW¼SE¼ §16 had only 2 feet of net pay in the Morrow "A" Sand and 4 feet of net pay in the Morrow "B" Sand, and was non-commercial.) Drilling at the proposed location should enable the well to test approximately 13-14 feet of net sand, without being too close to the area drained by the well

to the north, and substantially increase the chances of drilling a successful well,

The only affected offset operator is Ocean Energy, Inc. ("Ocean"), the operator of the Parkway West Unit, which includes all of Sections 20 and 21. A notice latter has been sent to the offset. See Exhibit D. However, Ocean has verbally waived objection of the location. If you have any questions about the waiver, the landman at Ocean is Marcia Kehl, (303) 573-4634. Due to the waiver of objection, applicant requests that the 20 day notice period be waived.

This application is submitted in duplicate. Please call me if you need anything further on this matter.

Very truly yours,

James JBruce

Attorney for KCS Medallion Resources, Inc.

DISTRICT ! F.S. Best 1980, Hobbs, NM 08861-1960 State of New Mexico

Energy, Minerals and Maharal Resources Department

Perm C-102 Submit to Appropriate States of Control
State Lears - 4 Control
DEC 22 Control
3 Control

OPPRATIONED REPORT

DISTRICT II F.D. SPENSO DB, APRAMA, NW 08311-0710

DISTRICT IV

DISTRICT III 1000 No Brasse Rd., Astes, 100 87410

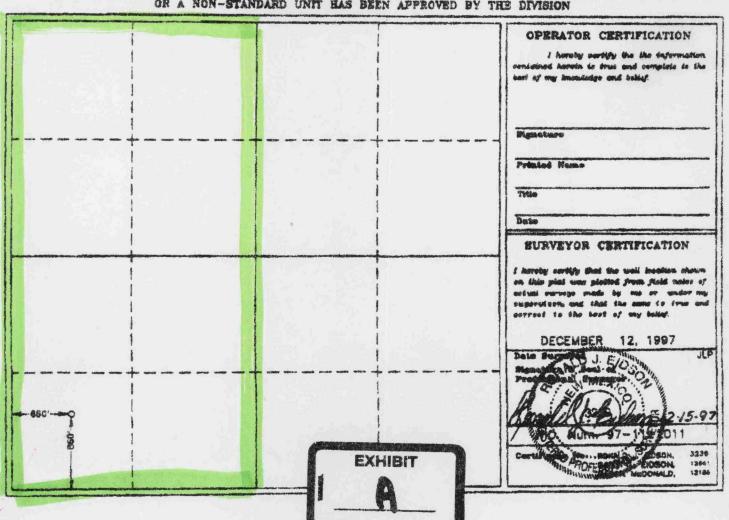
P.O. Box Mich. Santo Fe. NW 37504-2008

OIL CONSERVATION DIVISION P.O. Box 2088

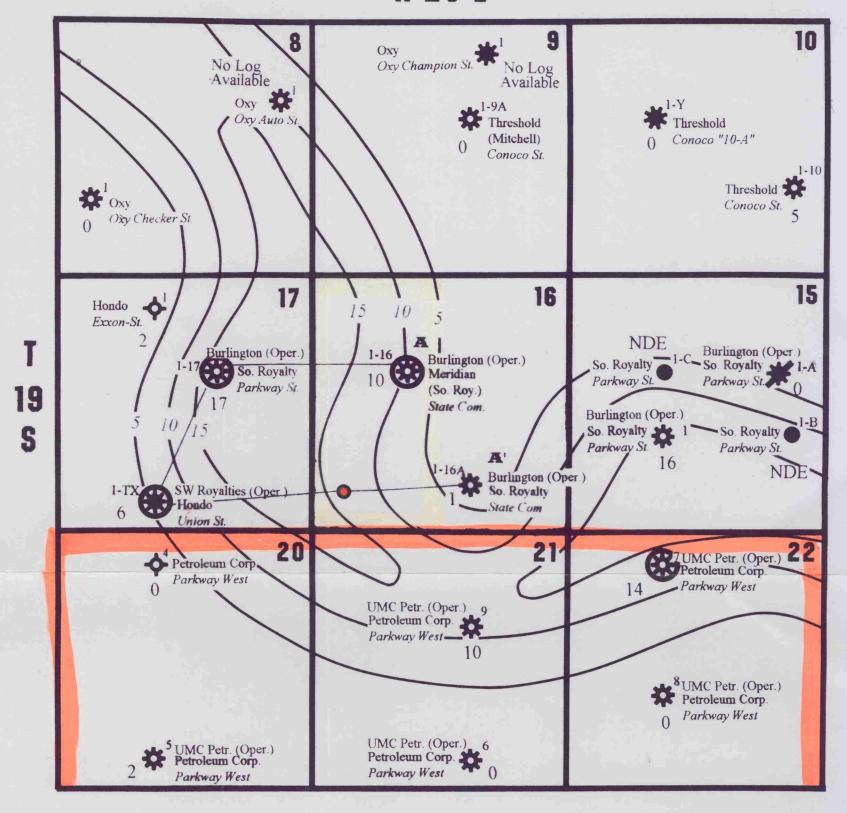
Santa Fe, New Mexico 87504-2088

APT	Humber			Pool Code		Pool Name				
Fraporty Code			Preparty Name PDM					Well Number		
OGMD N	3.		KCS MEDALLION RESOURCES, INC.						Blevetica 3341	
					Surface Loo	ation.			are an extensive	
JL or lot No.	16	19 S	Range 29 E	Let Ide	Feet from the 860	SOUTH	Feet from the 660	WEST	County	
			Bottom	Hole Lo	cation if Diffe	rent From Sur	face	A	production of statement	
A as lot No.	Section	Temaship	Runge	Let. Idn	Fact from the	North/South line	Feet from the	East/West line	County	
Dodicated Acres	Joint e	r Infili Con	solidation (ade Or	der No	L				

OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

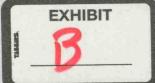


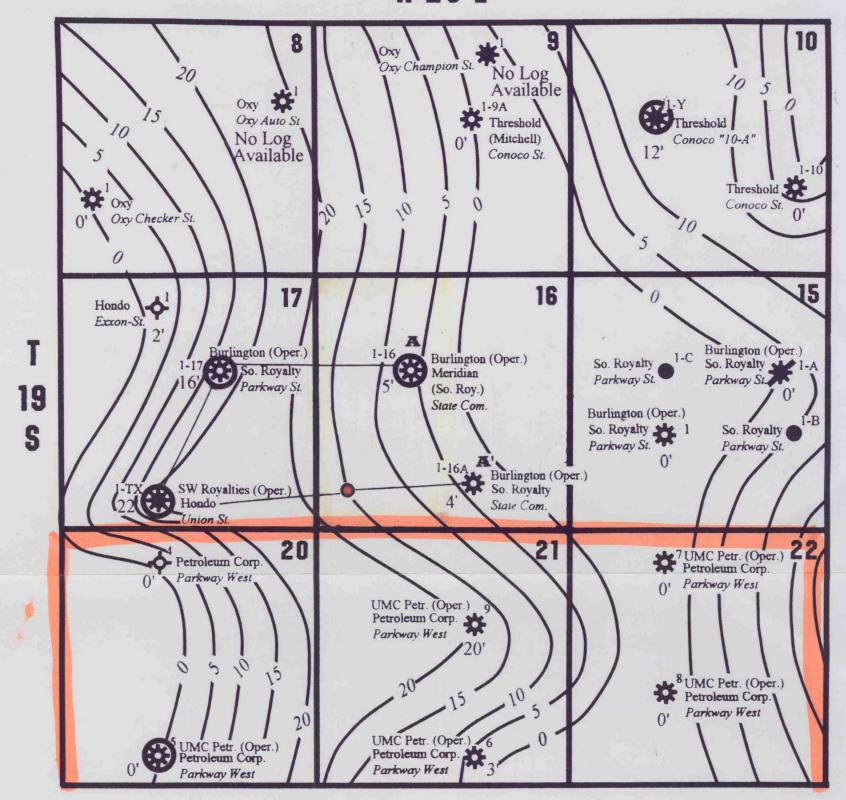
R-29-E



O MORROW "A" SAND PRODUCTION









O MORROW "B" SAND PRODUCTION

EXHIBIT C

JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

JuLY 17, 1998

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ocean Energy, Inc. Suite 1400 410 17th Street Denver, Colorado 80202

Attention: Marcia Kehl

Dear Marcia:

On July 17, 1998, KCS Medallion Resources, Inc. filed an application at the New Mexico Oil Conservation Division seeking administrative approval of an unorthodox gas well location for the PDM Well No. 1, located in the W½ of Section 16, Township 19 South, Range 29 East, NMPM, Eddy County, New Mexico. A copy of the application is enclosed. KCS Medallion's records show that OEI owns an interest offsetting the above well. If you object to the unorthodox location, you must notify the Division in writing no later than 20 days from the date of this letter. The Division's address is 2040 South Pacheco Street, Santa Fe, New Mexico 87505 (Attention: Michael E. Stogner).

Very truly yours,

James Bruce

Attorney for KCS Medallion Resources, Inc.

