November 24, 1998

Lori Wrotenbery, Director New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe. New Mexico 87505

Re:

Request for Administrative Approval of an Unorthodox Location

Basin Fruitland Coal Pool Stanolind Gas Com D #2 S/2 Section 17-32N-12W

San Juan County, New Mexico

5 miles past by west of ha Plata, Nas

74.

Gentlemen:

Cross Timbers Operating Company hereby requests administrative approval of the following unorthodox location:

Well Name:

Stanolind Gas Com D #2

Pool:

Basin Fruitland Coal

Location:

790' FSL & 790' FEL

Acreage Dedication:

S/2 Section 17-32N-12W, containing 320 acres, more or less

County/State:

San Juan County, New Mexico

Pool Rules:

Well location in NE/4 or SW/4

Attached is the following support and documentation for said application:

- 1. C-102 Plat
- 2. Geologic discussion
- 3. Copy of certified letter sent to offset operators/owners
 - A. Plat of offset operators
 - B. List of offset operators

We look forward to your approval and please call me at (817) 877-2336 with any questions.

Yours very truly,

Edwin S. Ryan, Jr.

Win Elan

cc: Bobby Smith - CTOC Midland

Gary Burch

Robin Tracy

NMCOD - Aztec District Office 1000 Rio Brazos Road Aztec, New Mexico 87410

Offset Operators

2915 687 0862 CRUSS ALLES CONTROL CONT

2002/003

District II PO Crawer DO, Artesia. NM 88211-0719

OIL CONSERVATION DIVISION PQ Box 2088 Santa Fe. NM 87504-2088

Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

Revised February 21, 1994

District III 1000 Rio Brazos Rd. Aztac. NM 87410

AMENGED REPORT

District IV PO 80x 2088, Santa Fe. NA 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

AP ; Number				Pool Cod	8	FRUITLAND COAL				
Property Code		STANOLIND GAS COM D				v,		1911 Number		
167067		CROSS TIMBERS OPERATING COMPANY					Elevation 5989			
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38 28 2635 2645 Signature Printed Name 5 6 8 Title Date "SURVEYOR CERTIFICATION I hereby contly that the wall location shown on this plants of plants from the feels noting of actual surveys sees by see on whom my substitution and that the some is true and connect to the best of my beller. 12 11 10 9 SEPTEMBER 28. _1998 90 Date of Survey O'EDWA 2616. <u> 190'</u> W MEYICO 6857 15 13 14 16 140 4996.86

STANOLIND GAS COM "D" #2 GEOLOGIC SUMMARY

The Stanolind Gas Com "D" #2 is a proposed 2000' Fruitland Coal test to be located 790' FSL and 790' FEL of Section 17-T32N-R12W San Juan County, New Mexico. There is currently no Fruitland Coal production in the section.

The Fruitland Coal in this area can be divided into an upper coal sequence, which is actually 3 or more 5-10 ft. thick coals over a 50-100 ft. interval, and a lower coal, which is 30-35 ft. thick in the prospect area, and overlies the Pictured Cliffs Formation.

The propsed well lies within a NE-SW trending structural flexure (see attached structure map). To the NW of the axis of structural flexure, the beds are steeply dipping to the SE. To the SE of the flexure, the beds are gently dipping to the SE. The axis of flexure, in theory, should be an area of intense fracturing, which in turn would correspond to highly productive Fruitland Coal wells. Outstanding coal production has been established along this trend 2 mi. to the NE and 3 mi. to the SW.

The primary risk in this area is in the amount of water production associated with the coal gas. The Fruitland Formation outcrops approximately 2 mi. NW of the producing trend, and is a recharge area for water which flows down towards the producing wells. Wells nearer to the outcrop (and structurally higher) produce more water. The water inhibits gas production, and consequently, wells that are too far updip produce too much water and too little gas to be economic. This effect can be seen on resistivity logs; as the water saturation increases, the amount of resistivity greater than 80 ohms (used as a cutoff for gas production) decreases.

Stanolind Gas Com "D" #2 Geologic Summary Page 2

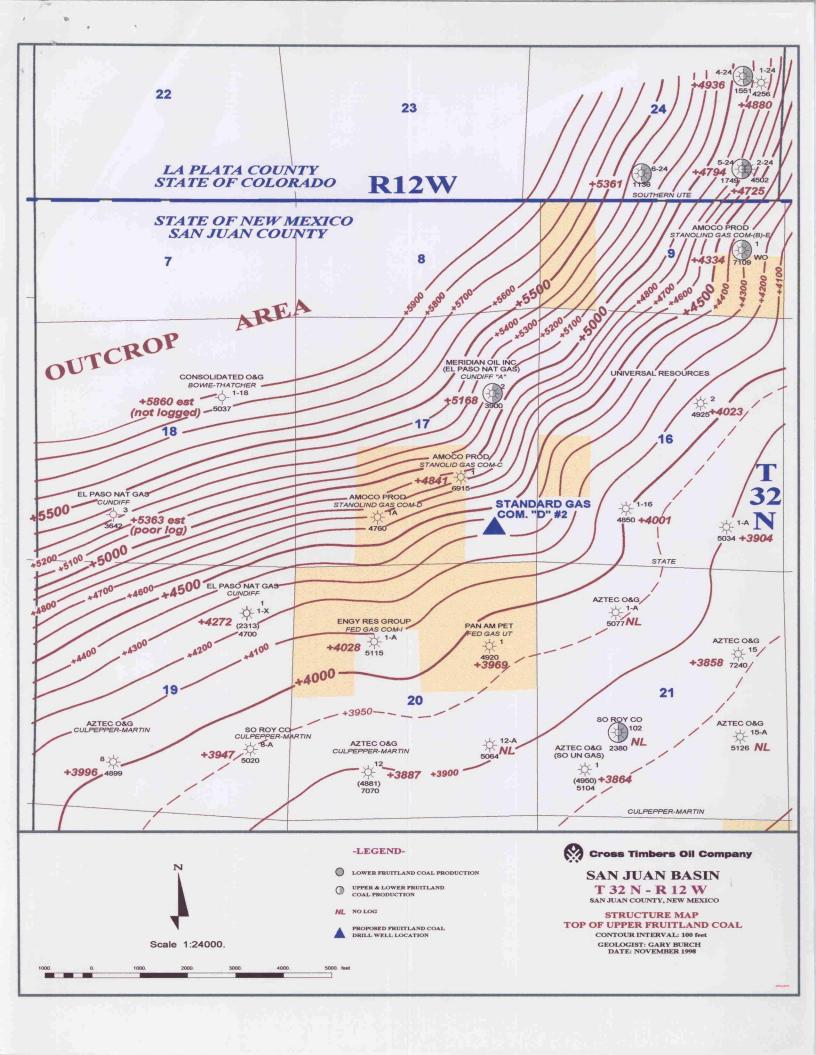
The following table shows the effect of structure on gas and water production rates on coal wells along trend to the NE:

	STRUCT. TOP OF FRUITLAND COAL	INITIAL STABILIZED GAS RATE (MCF/MO)	INITAL STABILIZED WATER RATE (BBL/MO)	CURRENT GAS RATE (MCF/MO.)	CURRENT WATER RATE (BBL/MO)
Southern Ute #6-24 SE SW Sec. 24-32N-12W La Plata Co., Colorado	+5361	10,000	20,000	15.000	12,000
Cundiff "A" #2 NE ¼ Sec. 17-32N-12W San Juan Co., NM	+5168	NA	NA	0*	0*
Stanolind Gas Com "B" #1E SE ¼ Sec. 9-32N-12W San Juan Co., NM	+4334			36,000**	1,800**
Southern Ute 32-11 #19-2 SW ¼ Sec. 19-32N-11W	+4175	30,000	6,000	120,000	1,000

^{*} Well was tested in the Fruitland, but never put online and is now inactive (assumed to be uneconomic).

The Cundiff "A" #2 tested the Fruitland Coal at a legal location in Sec. 17 and did not make an economic well and is now inactive. A well at a legal location in the SW ¼ of Section 17 would likely be wet in the upper coals and may produce a substantial amount of water from the lower coal. In our opinion, the most geologically favorable, lowest risk, and best location from an economic standpoint would be in the SE¼. Therefore, in order to best capture the reserves in the SE¼ of Section 17, an unorthodox location is necessary.

^{**} Well has just recently been put on-line.





November 24, 1998

Certified Mail - Return Receipt Requested

Burlington Resources Oil & Gas Company P.O. Box 4289 Farmington, New Mexico 87499

Dugan Production Corporation P.O. Box 420 Farmington, New Mexico 87499

Re:

Unorthodox Location Stanolind Gas Com D #2 S/2 Section 17-32N-12W San Juan County, New Mexico

Gentlemen:

Cross Timbers Operating Company filed the attached application for administrative approval of the above unorthodox location with the New Mexico Oil Conservation Division on November 24, 1998. If you object to the application, you must file a written objection with the Oil Conservation Division within 20 days of the date the application was filed.

Yours very truly,

Cross Timbers Operating Company

Edwin S. Ryan, Jr.

Win Ryan

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OFFSET OPERATORS/OWNERS UNORTHODOX LOCATION STANOLIND GAS COM D #2 S/2 SECTION 17-32N-12W SAN JUAN COUNTY, NEW MEXICO

Dugan Production Corporation P.O. Box 420 Farmington, New Mexico 87499

Burlington Resources Oil and Gas Company P.O. Box 4289 Farmington, New Mexico 87499