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GARY E. JOHNSON GOVERNOR

JENNIFER A. SALISBURY cabinet secretary

April 25, 2000

Lyn Hebert Legal Counsel Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505

Subject: Case 12401, Docket No. 12-00 May 4, 2000

Dear Ms Lyn Hebert

I have reviewed the application of Ocean Energy Resources, Inc. for Pool Creation and Special Pool Rules, Pool Contraction, and Cancellation of Overproduction, Lea County, New Mexico (Case 12401). As the District I Geologist for the Division, I would like to state my opposition to this application as it is advertised. In paragraph (i) and (ii) of this applicant seeks the following: to contract the horizontal limits of the South Big Dog-Strawn Pool by severing the S/2 SE/4 of Irregular Section 2 and the NE/4 of Section 11, both in Township 16 South, Range 35 East and the creation of a new pool for the production of oil from the Strawn formation to comprise this severed acreage.

If a new pool is created by the above contraction, the acreage in the NW/4 of Section 12 would no longer be contiguous with other acreage in the South Big Dog-Strawn (see attached pool map). I believe the acreage in the NW/4 of Section 12 should be included in the new pool.

Yours very truly,

Oil Conservation Division

Paul F. Kautz

Paul F. Kautz Petroleum Engineering Specialist

cc: Lori Wrotenbery Chris Williams

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