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Ms. Lori Wrotenberg, Director
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, New Mexico 87505

**CASE 12745: Burlington Resources Oil & Gas Company and Conoco Inc.
application to amend Special Rules and Regulations for the Basin-Dakota Gas Pool
to increase well density and amend well location requirements
San Juan, McKinley, Sandoval and Rio Arriba Counties, New Mexico**

BP supports the application by Burlington and Conoco to the New Mexico Oil Conservation Division for 80-acre infill development in the Basin Dakota pool. We have reviewed the results from their pilot infill wells and believe the 80-acre infill wells are economically viable and necessary to recover additional gas reserves that would otherwise be left behind.

BP also supports the creation of well location rules for the Basin Dakota pool that are identical to the rules for the Blanco Mesaverde pool. This will facilitate recovery of additional gas reserves using downhole commingling, thereby requiring fewer wellbores, and minimizing surface impacts associated with wellpads and pipelines.

BP believes NMOCD approval of the application for 80-acre infill in the Basin Dakota will be in the best interests of all parties by allowing recovery of additional gas reserves while protecting the correlative rights of all owners and minimizing surface impacts of development.

Sincerely,

Bill Hawkins
San Juan Regulatory Consultant