(and 23/2-

HUMBLE OIL & REFINING COMPANY

CENTRAL REGION

POST OFFICE BOX 120 - DENVER 1. COLORADO

DENVER AREA JOHN D. KNODELL, JR. AREA ATTORNEY

August 9, 1961

Mr. A. L. Porter Secretary-Director New Mexico Oil Conservation Commission Post Office Box 871 Sante Fe, New Mexico

> Re: Application of Aztec Oil & Gas Company for Administrative Approval for a Non-Standard Proration Unit in the Cha Cha-Gallup Oil Pool, San Juan County, New Mexico

Dear Mr. Porter:

By letter dated July 13, 1961, Aztec Oil & Gas Company requested approval for an exception to Rules 2 and 3 of Order Number R-1800 entered in Case Number 2069 for approval of an unauthorized well location and a nonstandard proration unit for the Aztec Hagood Well Number 29-G in the Cha Cha-Gallup Oil Pool, San Juan County, New Mexico. According to Rule 2 of Order Number R-1800, the allocation unit must consist of two contiguous quarterquarter sections of a single governmental quarter section. Aztec Oil & Gas Company requests an allocation unit consisting of the SE_4^1 of the SW_4^1 and the SW_4^1 of the SE_4^1 , Sec. 30, T 29N, R 13W.

This exception, if granted, and other exceptions which will normally result if this exception is granted, will result in the drilling of unnecessary wells along the east line of Humble's Navajo L Lease. Humble will be required to drill unnecessary wells in order to protect its own correlative rights and the correlative rights of its royalty owners and to prevent drainage of oil from Humble's Navajo L Lease. Such drilling of unnecessary wells will result in well density greater than that necessary to effectively drain the reservoir and will constitute waste as defined in the Oil and Gas Conservation Act.

Humble, therefore, requests that the proration unit for the Aztec well described above be established as the southwest fractional quarter of Section 30, T 29N, R 13W, consisting of 92 acres, more or less. Please enter Humble Oil & Refining Company's objection to the application described above of Aztec Oil & Gas Company.

JDK:cc C.c. Mr. Howard C. Bratton Hervey, Dow & Hinkle Box 10 Roswell, New Mexico

Very truly yours, HUMBLE OIL & REFINING COMPANY Βv ohn D. Knodel

Mr. Kenneth A. Swanson Aztec Oil & Gas Company 920 Mercantile Securities Building Dallas 1, Texas