

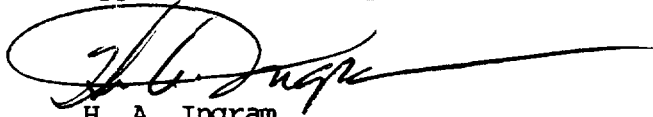
SUPPORTING STATEMENT  
Case No. 8397

Conoco supports Gulf's proposed Eunice Monument South Unit and recommends the Commission approve the application as submitted in Case No. 8397.

There are over 14,000,000 barrels of remaining primary reserves to be recovered from the proposed unit area. In view of the poor performance of the one existing waterflood in this pool, Texaco's Eunice Monument Unit, we believe the formula proposed is fair when consideration is given to risk associated with secondary recovery.

We also believe the assessing of a payment to be made by owners failing to contribute a useable well is fair since it partially compensates the unit for the extra expenditures it is forced to make in order to conduct secondary operations on the offending tract.

We therefore believe the agreements approved by majority agreement of the unit working interest owners are equitable and that the commission should approve Gulf's requests.

A handwritten signature in dark ink, appearing to read 'H. A. Ingram', with a long horizontal flourish extending to the right.

H. A. Ingram  
Conservation Coordinator

:mjs

STATEMENT FOR PRESENTATION TO  
THE NEW MEXICO OIL CONSERVATION COMMISSION  
IN SUPPORT OF  
GULF'S APPLICATION FOR THE PROPOSED EUNICE  
MONUMENT SOUTH UNIT,  
LEA COUNTY, NEW MEXICO

SHELL WESTERN E&P INC. BELIEVES THAT THE SUPPLEMENTAL RECOVERY PROJECT PROPOSED BY GULF WILL RESULT IN THE ECONOMIC PRODUCTION OF SIGNIFICANT VOLUMES OF ADDITIONAL OIL COMPARED WITH DEPLETION THROUGH PRESENT METHODS OF OPERATION. THIS ADDITIONAL RECOVERY WILL BENEFIT EACH ROYALTY INTEREST OWNER AND WORKING INTEREST OWNER IN THE PROPOSED UNIT.

SHELL WESTERN ALSO BELIEVES THAT THE PROPOSED PARTICIPATION FORMULA IS A REASONABLE COMPROMISE THAT PROVIDES EQUITY TO ALL INTERESTS. IT RECOGNIZES THAT SIGNIFICANT PRIMARY OIL RESERVES REMAIN IN THE PROPOSED UNIT, AND THAT PRODUCTION AND REVENUES WILL ALMOST EXCLUSIVELY BE FROM THESE RESERVES FOR THE NEXT SEVERAL YEARS AS WATERFLOODING GETS UNDERWAY. CONSIDERING THE TIME-VALUE OF MONEY, THE REVENUE FROM THESE EARLY YEARS HAS A BIG IMPACT ON THE OVERALL ECONOMICS OF THE PROJECT. THEREFORE, REMAINING PRIMARY RESERVES AND CURRENT PRODUCTION DESERVE TO RECEIVE STRONG CONSIDERATION IN THE PARTICIPATION FORMULA ADOPTED. WE BELIEVE THE PROPOSED FORMULA STRIKES A REASONABLE BALANCE BETWEEN THESE FACTORS AND THE SUPPLEMENTAL OIL RECOVERY, WHICH WILL BE RECEIVED IN LATER YEARS.

WITH REGARD TO ASSETS CONTRIBUTED BY WORKING INTEREST OWNERS, WE BELIEVE THAT UNIFORM ASSESSMENTS AGAINST CONTRIBUTORS OF UNDERDEVELOPED ACREAGE IS A REASONABLE APPROACH. THIS ENCOURAGES THE CONTRIBUTION OF AVAILABLE WELLS AND TENDS TO EQUALIZE THE DEGREE TO WHICH INDIVIDUAL PROPERTIES HAVE BEEN DEVELOPED.

AS WITH ANY PROJECT INVOLVING A NUMBER OF DIFFERENT INTERESTS, THERE ARE MANY ALTERNATIVES, EACH OF WHICH MIGHT CHANGE THE DEGREE OF BENEFIT TO ANY GIVEN PARTY. WE BELIEVE THE CONSIDERATIONS PROPOSED BY GULF FAIRLY ACCOUNT FOR THE FACTS AND EACH INDIVIDUAL'S INTERESTS. EACH PARTICIPANT WILL EQUITABLY SHARE IN A PROJECT THAT WILL RESULT IN IMPROVED OPERATING EFFICIENCY AND INCREASED RECOVERY OF OIL AND GAS.

WE SUPPORT GULF'S APPLICATION FOR THIS UNIT, AND BELIEVE THAT ITS TIMELY APPROVAL WILL BE IN THE BEST INTERESTS OF THE ROYALTY AND WORKING INTEREST OWNERS AS WELL AS THE STATE OF NEW MEXICO.

*Donald H. Fane*  
*Production Administration Advisor*  
*Shell Western E & P, Inc.*

*November 7, 1984*




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		<u>ACREAGE</u>	<u>PERCENTAGE</u>
	FEDERAL LANDS	2,734.76	19.27 %
	STATE LANDS	8,274.80	58.32 %
	PATENTED LANDS	3,180.28	22.41 %
	<b>TOTAL</b>	<b>14,189.84</b>	<b>100.00 %</b>

UNIT OUTLINE      ③ TRACT NUMBER



NOTE: UNLESS OTHERWISE INDICATED, THE VARIOUS SECTIONS ON THIS PLAT CONTAIN 640.00 ACRES.

**EXHIBIT "1"**

# EUNICE MONUMENT SOUTH UNIT AREA

**LEA COUNTY, NEW MEXICO**

**GULF OIL CORPORATION**  
MIDLAND, TEXAS



R 36 E

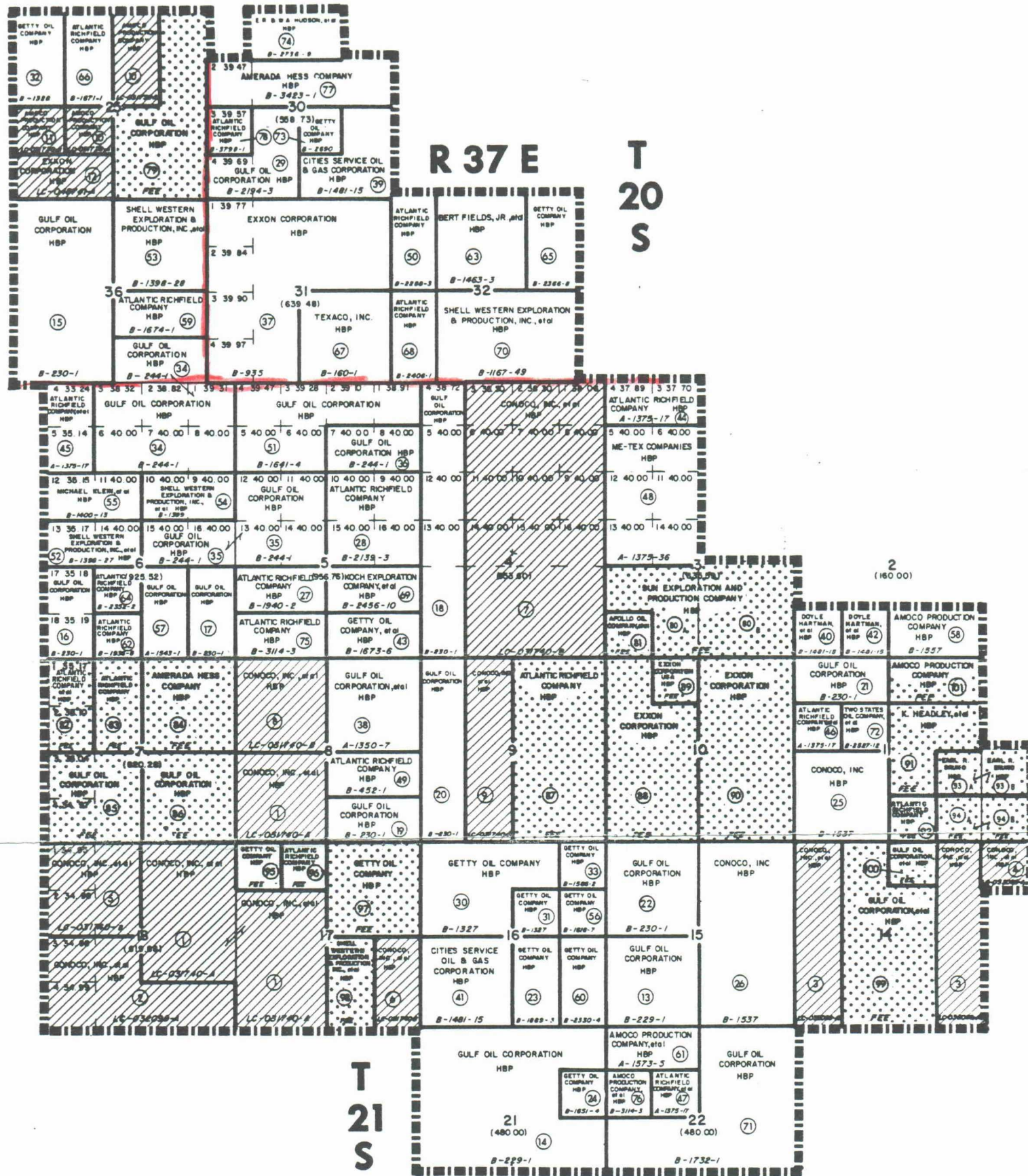
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EXHIBIT "1"

# EUNICE MONUMENT SOUTH UNIT AREA

LEA COUNTY, NEW MEXICO



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PATENTED LANDS	3,180.28	22.41 %
TOTAL	14,189.84	100.00 %

UNIT OUTLINE (3) TRACT NUMBER

SCALE IN MILES  
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NOTE: UNLESS OTHERWISE INDICATED, THE VARIOUS SECTIONS ON THIS PLAT CONTAIN 640.00 ACRES.

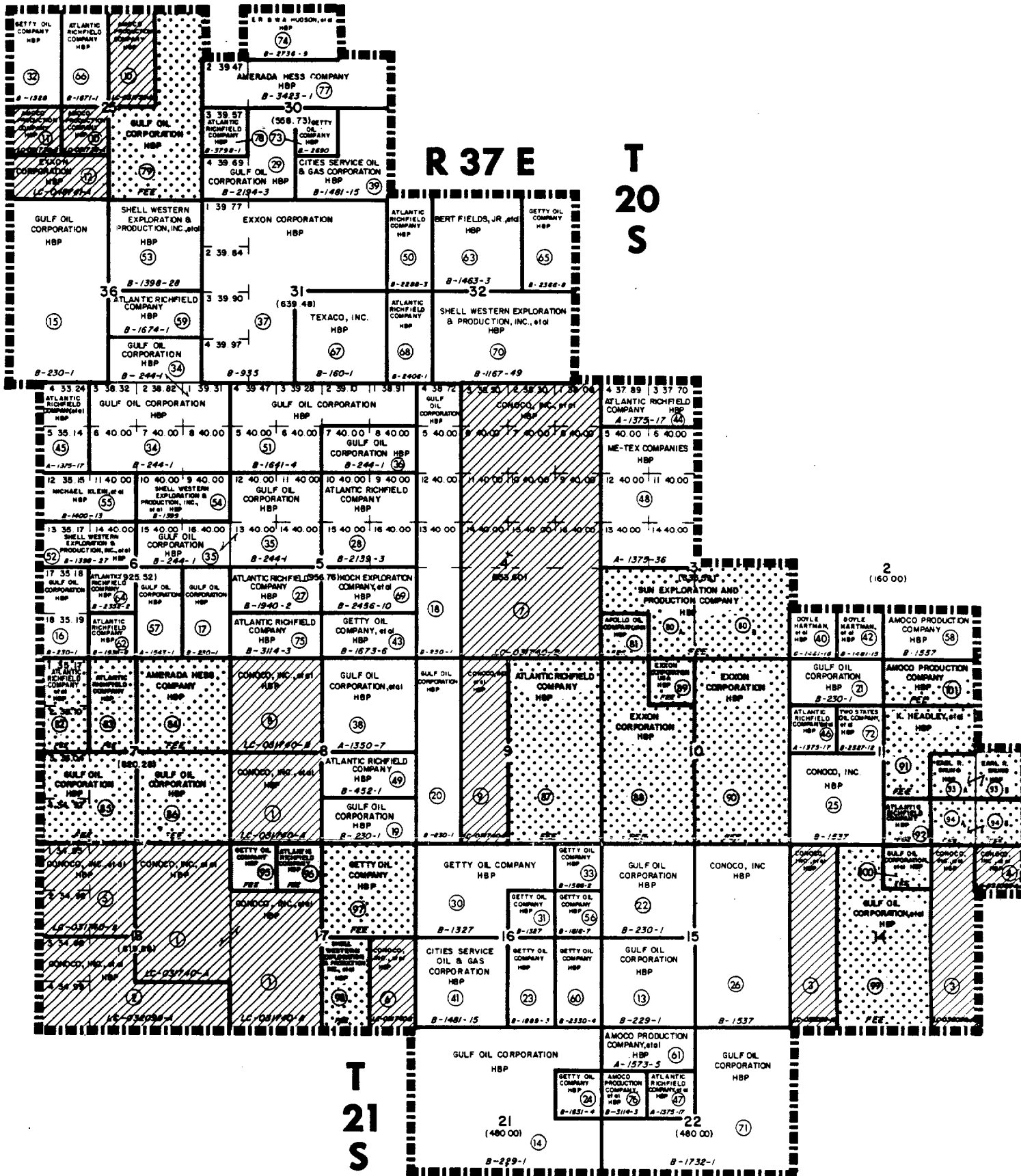
**GULF OIL CORPORATION**  
MIDLAND, TEXAS

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

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	ACREAGE	PERCENTAGE
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	STATE LANDS	8,274.80 58.32 %
	PATENTED LANDS	3,180.28 22.41 %
	TOTAL	14,189.84 100.00 %

UNIT OUTLINE      ③      TRACT NUMBER



SCALE IN MILES

NOTE: UNLESS OTHERWISE INDICATED, THE VARIOUS SECTIONS ON THIS PLAT CONTAIN 640.00 ACRES.

EXHIBIT "1"

# EUNICE MONUMENT SOUTH UNIT AREA

LEA COUNTY, NEW MEXICO

GULF OIL CORPORATION  
MIDLAND, TEXAS

Jason Kellahin  
W. Thomas Kellahin  
Karen Aubrey

KELLAHIN and KELLAHIN  
*Attorneys at Law*  
El Patio - 117 North Guadalupe  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265

Telephone 982-4285  
Area Code 505

September 27, 1984

RECEIVED

OCT 3 - 1984

Mr. Richard L. Stamets  
Acting Director  
Oil Conservation Commission  
P. O. Box 2088  
Santa Fe, New Mexico 87501

OIL CONSERVATION DIVISION

"Hand Delivered"

Re: Gulf Oil Exploration and Production Company

*Case*  
8399

Dear Mr. Stamets

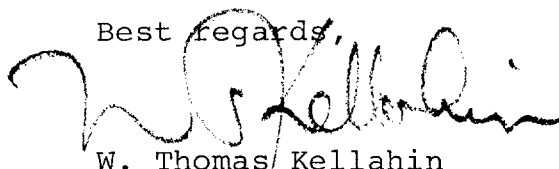
On behalf of Gulf, please find enclosed the following three applications:

- (1) Application of Gulf Exploration and Production Corporation for Statutory Unitization, Eunice Monument South Unit, Lea County, New Mexico;
- (2) Application of Gulf Exploration and Production Company for Authority to Institute a Waterflood Project for the Eunice Monument South Unit, Lea County, New Mexico; and
- (3) Application of Gulf Exploration and Production Corporation for Extension of the Vertical Limits of the Eunice-Monument Oil Pool underlying the Eunice Monument South Unit, Lea County, New Mexico.

Also, in connection with the Waterflood Project Application, please find enclosed the completed Division Order C-108 with enclosures.

I would appreciate you scheduling this applications for a Commission hearing on November 8, 1984. If that date is not convenient for you, please let me know so that we can discuss an alternate date.

Best regards,

  
W. Thomas Kellahin

WTK:ca  
Enc.

KELLAHIN and KELLAHIN

Mr. Richard L. Stamets  
September 27, 1984  
Page 2

cc: John Frank  
Gulf Oil Corporation  
P. O. Box 1150  
Midland, Texas 79702

David Berlin  
Gulf Oil Corporation  
P. O. Box 1150  
Midland, Texas 79702



STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY AND MINERALS  
OIL CONSERVATION DIVISION

RECEIVED

OCT 3 - 1984

APPLICATION OF GULF OIL CORPORATION  
FOR EXTENSION OF THE VERTICAL LIMITS  
OF THE EUNICE-MONUMENT OIL POOL UNDERLYING  
THE EUNICE MONUMENT SOUTH UNIT  
LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

Case No. 8399

A P P L I C A T I O N

Gulf Oil Corporation hereby applies to the New Mexico Oil Conservation Commission for an order providing for the extension of the vertical limits of the Eunice-Monument Oil Pool under the Eunice Monument South Unit, Lea County, New Mexico, and in support of its application states:

1. Gulf Oil Corporation (Gulf) is a Pennsylvania corporation authorized to transact business in the State of New Mexico, and is engaged in the business of, among other things, producing and selling oil and gas.

2. The proposed area (the "Unit Area") for which application is made is known as the Eunice Monument South Unit and consists of 14,189.84 acres, more or less, in Lea County, New Mexico and is more particularly shown in Exhibit No. 1 attached hereto and incorporated herein by reference.

3. The southern portion of the Eunice-Monument Oil Pool was formerly designated the Eunice (Penrose, Grayburg, San Andres) Pool. The Eunice Pool was discovered March 21, 1929 upon completion of the Continental Oil Company's Lockhart B-31 Well No. 1 in Section 31, Township 21 South, Range 36 East, Lea County, New Mexico. All oil

wells within the Unit Area were classified as Eunice oil wells until the New Mexico Oil Conservation Division created the Eumont Gas Pool overlying the Eunice and Monument Oil Pools by Order No. R-264, effective February 17, 1953. The Eumont Gas Pool vertical limits were then defined as extending from the top of the Yates formation to a point 200 feet below the top of the Queen formation thereby including all of the Seven Rivers formation. Order No. R-264-A, effective November 10, 1953, and Order No. R-1670, effective May 20, 1960, both amend the vertical limits of the Eumont Gas Pool to "extend from the top of the Yates formation to the top of the Grayburg formation, thereby including all of the Yates, Seven Rivers and Queen formations". This contracted the vertical limits of the Eunice and Monument oil pools to contain only the Grayburg and San Andres formations. This created a situation in which wells within the Unit Area had completion intervals overlapping the two pools.


4. To rectify the aforesaid would require workover operations on the subject wells within the Unit Area which would be expensive and would likely endanger the productivity of the subject wells, and would not allow for effective and manageable secondary recovery operations which is the purpose for the Unit.

5. A reasonable solution to the problem is to contract the vertical limits of the Eumont Gas Pool and to expand the vertical limits of the Eunice-Monument Oil Pool, upward, so as to be at a subsea datum of -100 feet or the top of the Grayburg formation, whichever is higher. This new vertical limits definition to the Eunice-Monument Oil Pool would apply only to the area underlying the Eunice Monument South Unit, Lea County, New Mexico. This adjustment will allow for a more manageable

Unit Area and a more effective waterflood of the entire oil column underlying the Unit Area which will prevent waste and should not impair correlative rights.

WHEREFORE, Gulf respectfully requests that this application be set for hearing before the Oil Conservation Commission at the earliest practicable date and that the Commission enter its order approving the extension of the vertical limits of the Eunice Monument Oil Pool underlying the Eunice Monument South Unit.

Kellahin & Kellahin

By   
W. Thomas Kellahin  
P. O. Box 2265  
Santa Fe, New Mexico 87501

Attorneys for Gulf Oil Corporation

# Gulf Oil Exploration and Production Company

WESTERN DIVISION

L. A. Turner  
GENERAL MANAGER  
U. S. PRODUCTION OPERATIONS

P. O. Drawer 1150  
Midland, TX 79702

September 24, 1984

RECEIVED

State of New Mexico  
Department of Energy and Minerals  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

OCT 3 - 1984

OIL CONSERVATION DIVISION

Attention: Mr. R. L. Stamets, Acting Director

*Case 8399*

Gentlemen:

Re: Applications for Commissioners'  
Hearing for  
Eunice Monument South Unit,  
Lea County, New Mexico

Gulf Oil Corporation respectfully requests that our attached applications concerning the proposed Eunice Monument South Unit, Lea County, New Mexico, be set for the earliest scheduled Commissioners' Hearing in November, 1984. The attached applications, each for separate docketing, are for Statutory Unitization, Authority to Institute a Waterflood Project, and the Extension of the Vertical Limits of the Eunice-Monument Oil Pool for the proposed Eunice Monument South Unit.

The proposed Eunice Monument South Unit area consists of 14,189.84 acres, more or less, comprising approximately 357 40-acre units divided into 101 individual tracts. The proposed vertical interval to be unitized shall include the formations from a lower limit defined by the base of the San Andres formation, to an upper limit defined by the top of the Grayburg formation or a -100 foot subsea datum, whichever is higher.

The purpose for forming the Eunice Monument South Unit is to provide for secondary recovery operations to substantially increase the ultimate recovery of oil and gas. Gulf projects that, as a result of unitized management, operation and further development of the "Unitized Interval" within the "Unit Area", the ultimate production will increase by approximately 64.2 million barrels of oil over a 30 year flood life.

To establish an effective and manageable waterflood project, the contraction of the vertical limits of the Eumont Gas Pool and the upward extension of the vertical limits of the Eunice-Monument Oil Pool under the proposed Unit Area is needed. This will allow for a more controllable waterflood of the entire oil column within the



Unitized Interval, thereby preventing waste and protecting correlative rights.

Submitted and attached to the enclosed applications are copies of the Unit Agreement and Unit Operating Agreement, various plats of the Unit Area, a table detailing ownership of oil and gas interests, percentages and participations in the Unit, a well log showing the vertical limits of the Unitized Interval, the OCD Form C-108, wellbore configurations of proposed injection wells, geologic data, fresh water source data, and schematic diagrams and other pertinent well data on all wells within the Unit boundary and one-half mile outside the Unit boundary.

The working interest owners, operators, and surface land owners within the Unit Area, as well as offset operators, the Commissioner of Public Lands of the State of New Mexico, and the District Director of the Bureau of Land Management are being notified of this request by a copy of this letter, a Unit Area plat, and each of the applications without their attachments.

Your consideration and granting of the attached applications for a Commissioners' Hearing in November, 1984, regarding the proposed Eunice Monument South Unit, will be greatly appreciated. If you should need additional information or have any questions concerning this, please contact Mr. D. T. Berlin at (915) 687-7339 or Mr. A. W. Bohling at (915) 687-7336.

Yours very truly,

A handwritten signature in black ink, appearing to read "L. A. Turner", with a stylized, flowing script.

L. A. TURNER

AWB:ac

Enclosures

cc: Enclosed List  
W. Thomas Kellahin  
P. O. Box 2265  
Santa Fe, New Mexico 87501

## STATE AND FEDERAL AGENCIES

United States Department of the Interior  
Bureau of Land Management  
Roswell District Office  
P. O. Box 1397  
Roswell, New Mexico 88201

Attention: Mr. Roy Stovall

State of New Mexico  
Commissioner of Public Lands  
P. O. Box 1148  
Santa Fe, New Mexico 87504

Attention: Mr. Jim Baca

State of New Mexico  
Department of Energy and Minerals  
Oil Conservation Division  
District 1  
P. O. Box 1980  
Hobbs, New Mexico 88240

Attention: Mr. Jerry Sexton



WORKING INTEREST OWNERS

Amerada Hess  
P. O. Box 2040  
Tulsa, Oklahoma 74102  
Attn: Mr. J. C. Hefley, Mgr.  
Joint Venture-U.S., Onshore

Amoco Production Company (USA)  
P. O. Box 3092  
Houston, Texas 77253  
Attn: Mr. Bruce A. Landis, Jr.

Apollo Oil Company  
P. O. Box 1737  
Hobbs, New Mexico 88240  
Attn: Mr. Alan Ralston

ARCO Oil and Gas Company  
P. O. Box 1610  
Midland, Texas 79702  
Attn: Mr. C. R. Leggott

Mr. Kenneth R. Boss  
East Star Route  
Box 9-B  
Lovington, New Mexico 88260

Brady Production Company  
P. O. Box 9128  
Midland, Texas 79708

Mrs. Ethel T. Dennis  
c/o Crane Oil Company  
P. O. Box 1764  
Midland, Texas 79702

Earl R. Bruno  
P. O. Box 5456  
Midland, Texas 79704

Mr. John Catron  
Catron Working Interest Accts.  
Catron, Catron and Sawtell  
P. O. Box 788  
Santa Fe, New Mexico 87501

Chevron U.S.A., Inc.  
P. O. Box 1660  
Midland, Texas 79702  
Attn: Mr. W. A. Goudeau

Cities Service Company  
P. O. Box 1919  
Midland, Texas 79702  
Attn: Mr. K. D. Van Horn

Conoco, Inc.  
P. O. Box 460  
Hobbs, New Mexico 88240  
Attn: Mr. Mark K. Mosely

Estate of Herman R. Crile, Sr.  
c/o Mr. Bernard Johnston  
P. O. Box 880  
Roswell, New Mexico 88201

Mr. Thomas W. Ellison  
2502 Cimmaron  
Midland, Texas 79705

Exxon Company, U.S.A.  
P. O. Box 1700  
Midland, Texas 79702  
Attn: Mr. R. R. Hickman

Bert Fields, Jr.  
11835 Preston Road  
Dallas, Texas 75230  
Attn: Mr. Jerry H. Doughman

First National Bank  
105 North Main  
Wichita, Kansas 67202  
Attn: Mr. Steven Woods, Trust Dept.  
U/W of Wm. E. Perdeu

Getty Oil Company  
P. O. Box 1231  
Midland, Texas 79702  
Attn: Mr. Raymond H. Blohm

Mr. Doyle Hartman  
P. O. Box 10426  
Midland, Texas 79702

Mr. Kenneth Headley  
P. O. Box 569  
Tijeras, New Mexico 87509

John H. Hendrix Corporation  
525 Midland Tower  
Midland, Texas 79701  
Attn: Mr. John H. Hendrix

E. R. Hudson, Agent for the  
Charles H. Moore, et al, Interest  
1440 Interfirst Tower  
801 Cherry Street  
Fort Worth, Texas 76102

WORKING INTEREST OWNERS (cont.)

William A. and Edward R. Hudson  
1440 Interfirst Tower  
801 Cherry Street  
Fort Worth, Texas 76102  
Attn: Mr. Edward R. Hudson

Mr. Michael Klein  
One First City Center  
Suite 505  
Midland, Texas 79701

Ms. Suzanne H. Klein  
1980 South Post Oak  
Suite 1075  
Houston, Texas 77056

Koch Exploration Company  
P. O. Box 2256  
Wichita, Kansas 67201  
Attn: Mr. Jim Whisnand

George H. Landreth  
206 Bluff Crest  
San Antonio, Texas 78216

W. A. Landreth  
908 The Texas Building  
Fort Worth, Texas 76102

ME-TEX Companies  
P. O. Box 2070  
Hobbs, New Mexico 88240  
Attn: Mr. Burton Veteto

Mr. Carl R. Pfluger  
Box S  
Eden, Texas 76837

RepublicBank Dallas  
Oil & Gas Trust Dept.  
Jeanne Fields Shelby, et al, Agency  
No. 9591-00  
P. O. Box 241  
Dallas, Texas 75221  
Attn: Mr. Jim B. Brown  
Vice President

S & S Engineering  
P. O. Box 8923  
Midland, Texas 79708

Shell Oil Company  
P. O. Box 991  
Houston, Texas 77001  
Attn: Mr. B. G. Ratterree

Sun Exploration and Production Co.  
Campbell Center II  
P. O. Box 2880  
Dallas, Texas 75221  
Attn: Mr. J. W. Thornton

Fred Turner, Jr., Trust  
P. O. Box 910  
Midland, Texas 79702  
Attn: Mr. Ray Floyd

Two States Oil Company  
Suite 1401  
Mercantile Commerce Bldg.  
Dallas, Texas 75201  
Attn: Mr. Walter Crane

Mr. Bruce Wilbanks  
P. O. Box 763  
Midland, Texas 79702

The Wiser Oil Company  
P. O. Box 192  
Sistersville, W. VA. 26175  
Attn: Mr. Charles P. LaRue

## OFFSET OPERATORS

Adobe Oil & Gas Corp.  
1100 Western United Life Bldg.  
Midland, Texas 79701

Anadarko Production Co.  
P. O. Box 2497  
Midland, Texas 79702

Lewis B. Burleson, Inc.  
P. O. Box 2479  
Midland, Texas 79702

Campbell & Hedrick  
P. O. Box 401  
Midland, Texas 79701

El Paso Natural Gas Co.  
P. O. Box 1492  
El Paso, Texas 79978

Elliott Oil Co.  
P. O. Box 2159  
Abilene, Texas 79604

J. L. Evans  
P. O. Box 1125  
Eunice, New Mexico 88231

Hanson Operating Co.  
P. O. Box 1515  
Roswell, New Mexico 88202

Ernie L. Hegwer Co.  
P. O. Box 24  
Hobbs, New Mexico 88240

John H. Hendrix Corp.  
525 Midland Tower  
Midland, Texas 79701

Kern Co.  
3005 N. Big Spring  
Midland, Texas 79705

MKA Oil Properties  
One First City Center  
Suite 505  
Midland, Texas 79701

Marathon Oil Co.  
P. O. Box 552  
Midland, Texas 79702

Petro Lewis Corp.  
P. O. Box 2250  
Denver, Colorado 80201

Phillips Petroleum Co.  
4001 Penbrook  
Odessa, Texas 79762

Superior Oil Co.  
204 W. Illinois  
Midland, Texas 79702

Tenneco Oil Co.  
P. O. Box 2511  
Houston, Texas 77001

Trio Oil Co.  
c/o Oil Reports  
P. O. Box 763  
Hobbs, New Mexico 88240

Warrior, Inc.  
125 Midland Tower  
Midland, Texas 79701

Zia Energy, Inc.  
P. O. Box 603  
Hobbs, New Mexico 88240

SURFACE LAND OWNERS

Climax Chemical Co.  
Box 1595  
Hobbs, New Mexico 88240

Phillips Petroleum Co.  
4001 Pennbrook St.  
Room 206  
Odessa, Texas 79762

O. L. Coleman Estate  
c/o Emma Liston Archer Trust  
211 W. 6th St.  
Hale Center, Texas 79041

Mary Vern Ramson  
28890 Lilac Rd.; Space 148  
Valley Center, California 92082

Delbert D. Cooper  
Box 421  
Eunice, New Mexico 88231

Tommie Lou Cooper & Sons  
834 Gold  
Hobbs, New Mexico 88240

Millard Deck Estate  
c/o Kirkwood & Darby  
Continental Nat'l Bank Bldg.  
Fort Worth, Texas 76102

El Paso Natural Gas Co  
P.O. Box 1492  
El Paso, Texas 79978

A. C. Hooper Estate  
c/o Mrs. Aubrey F. Houston/Adm.  
712 W. Houston St.  
Sulphur Springs, Texas 75482

H.L. Houston  
712 W. Houston  
Sulphur Springs, Texas 75482

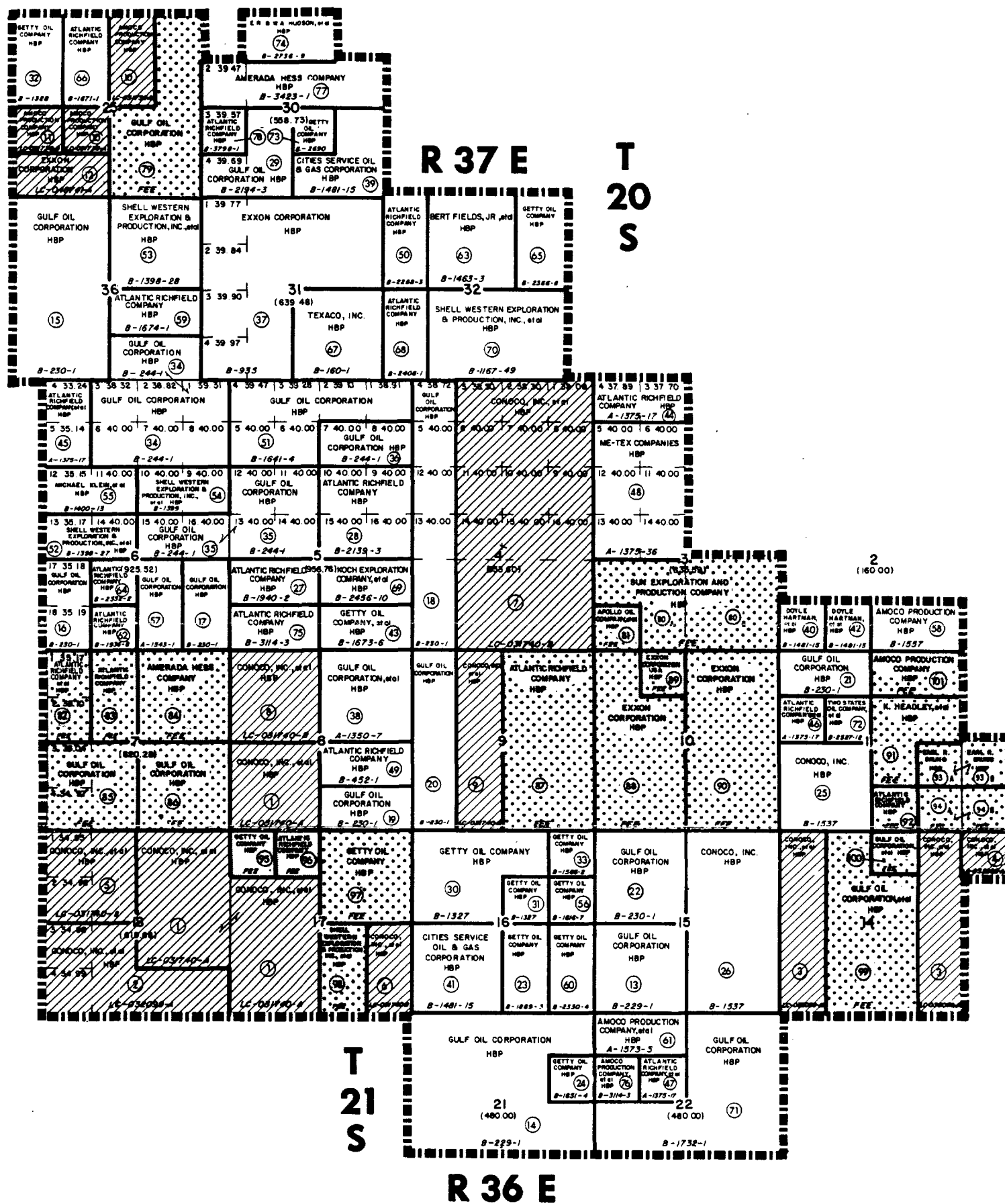
Tom Kennan  
Box 202  
Eunice, New Mexico 88231




Dallas McCasland, Inc.  
c/o W. J. McCasland  
P.O. Box 156  
Eunice, New Mexico 88231

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		<u>ACREAGE</u>	<u>PERCENTAGE</u>
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UNIT OUTLINE (3) TRACT NUMBER



NOTE: UNLESS OTHERWISE INDICATED, THE VARIOUS SECTIONS ON THIS PLAT CONTAIN 640.00 ACRES

**EXHIBIT "1"**

# EUNICE MONUMENT SOUTH UNIT AREA

LEA COUNTY, NEW MEXICO

**GULF OIL CORPORATION**  
MIDLAND, TEXAS