

The proposed East Blinebry-Drinkard Units, if approved, will unitize the Blinebry and Drinkard reservoirs of the unit area. Sandwiched between these two reservoirs is the Tubb formation which is productive of gas. Also immediately underlying the Drinkard is found the Wichita Albany-Abo formation which is an established source of supply of oil and gas from the unit area.

In the case of the Eubanks lease (Tract 13 to the Unit) some 46.5% of the known reserve is credited to the Tubb formation and 21.4% credited to the Abo formation. Therefore, we find 67.9% of the proven and productive reserve in formations which are adjacent to the proposed unitized formations and recoverable from bore holes that are also necessary for prosecution of the proposed plan of operation of the units.

The Unit Operating Agreements for which approval is being considered here provides through Paragraph 11.1 on page 17 that the operators of each 40 acre tract of the proposed unit contribute a usable well bore for that tract or be assessed an amount of money up to \$200,000 for each such well bore not so contributed. There is no provision for the Unit Working Interest Owners or its operators to compensate the contributing Working Interest Owners for loss of access to usable well bores in existence at the time of unitization that have been designed and planned for unitization in the recovery of Tubb or Abo reserve underlying the tracts included in this Unit.

The Eubanks lease contains four (4) well bores providing access to Blinebry, Tubb, Drinkard and Abo formations. If the terms of the Unit Operating Agreement are approved as they are presented here the Working Interest Owners of Tract 13 will be denied existing bore hole access to 67.9% of these proven and productive reserve or be assessed a major economic penalty. It is evident from this that the Unit Operating Agreement contains provisions allowing the Unit interest to confiscate valuable property without compensation.

It should also be pointed out that proven and producing natural gas reserves represented by the Tubb formation underlying the Eubanks (Tract 13) lease, as well as others of the area, are dedicated to El Paso Natural Gas Company through a Certificate of Necessity granted by the Federal Power Commission. If this access to producing Tubb gas is denied or damaged the owners of this lease will be faced with the obligation of providing a new bore hole through which the so dedicated gas may be delivered.

The economic implication of the proposed bore hole delivery or economic penalty requirement results in severe economic penalties to the owners of the Eubanks (Tract 13) lease, as well as assessable liability for loss of reserves dedicated to an interstate market under the rules of the Federal Power Commission.

Futhermore, the loss of bore hole accessibility will require major capital expenditures to recover known Abo reserves. These penalties alone could be severe enough to prohibit the recovery of known reserve and thereby cause the loss of valuable oil and gas reserves.

It is evident that the owners of leases occupying the eastern one half of the proposed unit are operating properties that are near economic limit of primary recovery from the Blinebry and Drinkard formations. We concur that these operators should consider some form of enhanced recovery to force the production of the natural resources known to remain in those formations. Those leases in the western portion of the unit are producing at rates substantially greater than the economic limit of primary production. At present rates of decline, some five to ten years will be required for the western wells to reach the present level of production experienced by the eastern wells.

The eastern portion of the proposed units do not appear to represent the significant volumes of Tubb or Abo reserves that are known to exist in the western portion of the area in question. Therefore, the economic loss of access to valuable natural resources in that eastern portion of the area may not be as great as that of the western part of the unit area.

Therefore, if applicable any attempt at conducting an enhanced recovery program should by all reasonable logic be confined to the eastern portion of the proposed unit area and prosecuted to a point that would prove without doubt that such methods of recovery are truly applicable and efficient before consideration is given to expansion of the unit operating area and methods of recovery are allowed to expand into the western area of significant remaining primary reserves and resources contained in Tubb and Abo formations.

The plan of operation for the proposed unit area as considered here is founded upon sound techniques that have been successful in other reservoirs. The only similar operation in the area of the proposed unit, however, is that of Gulf Oil Corporation in their Central Drinkard Unit.

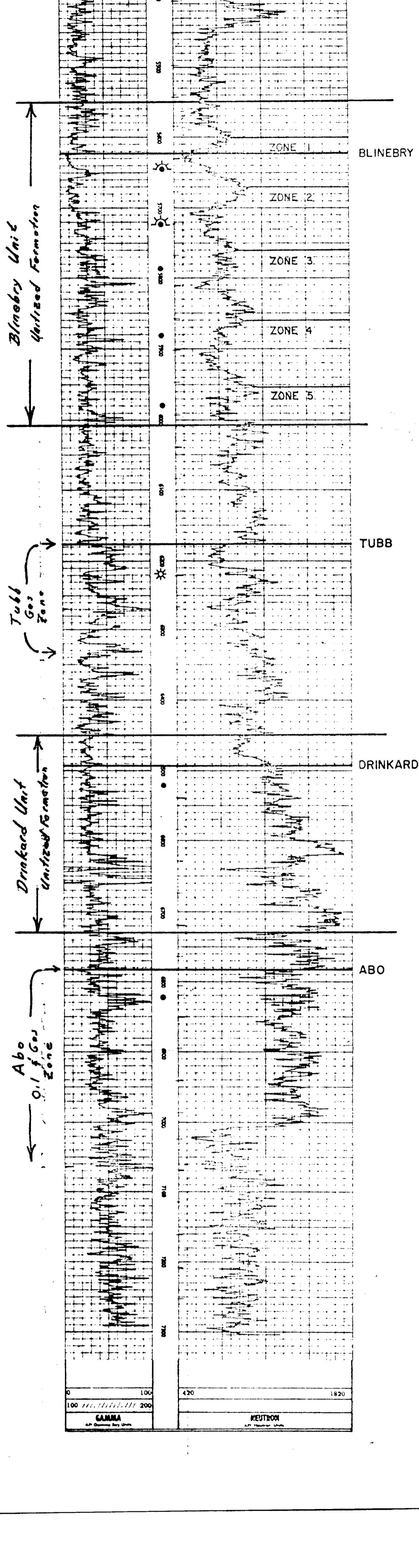
The Central Drinkard Unit occupies an area, the center of which is four miles southwest from that of the proposed unit area. The Central Drinkard Unit is of comparable size to that of the Units being considered here. This size being 2,600 acres with 53 producing wells and 3,080 acres with 60 proposed producing wells respectively.

The Central Drinkard Unit should have been expected to have performed in a manner similar to that expected for the proposed East Blinebry-Drinkard Units. Yet in some five years of operation it has performed to an extent of only 25.5% of that hoped for in the area under consideration. This failure of effectiveness of the Central Drinkard Unit further emphasizes the advisability of slow orderly development of such a program from a pilot flood operation only as sound results can dictate.

If the proposed unit operations are successful to an extent of twice that thus far indicated by the Central Drinkard Unit a severe economic as well as natural resource loss for the area will result.

FIGURE 3
ATLANTIC RICHFIELD COMPANY
ROY BARTON NO. 3
1980' FNL, 660' FEL, SEC. 23
T-21-S, R-37-E
LEA COUNTY, NEW MEXICO
EL. 3455'
T.D. 7993'

Exhibit 2



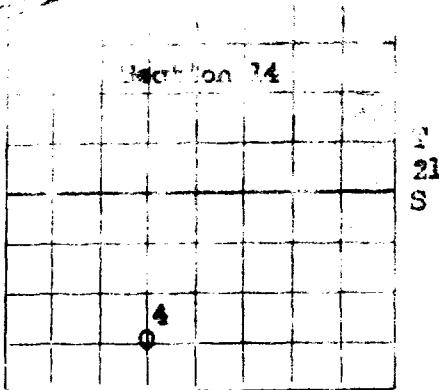
CONE ET AL - EUBANKS LEASE
ECONOMIC POTENTIAL SUMMATION
PRIMARY AND UNITIZED OPERATION

	Bbl	Mcf	Value
<u>Continued Primary Operation</u>			
Remaining Reserve			
Blinebry	83,065	2,492,000	\$1,941,353
Drinkard	38,340	268,000	533,249
Tubb	49,870	3,955,000	3,578,300
Abo	102,900	668,000	1,646,810
	274,175	7,383,000	\$7,699,712
Cost to recover 240 mo. @ \$2,100			(504,000)
Net Value			\$7,195,712
<u>Proposed Unitized Operation</u>			
Remaining Reserve			
Blinebry Phase I	79,220	658,531	\$1,270,860
Drinkard Phase I	35,713	296,868	572,912
Blinebry Phase II	372,397	604,372	4,273,775
Drinkard Phase II	413,593	671,229	4,746,556
	900,923	2,231,000	\$10,864,103
Cost to develop			(498,917)
Cost to recover 240 mo.			(\$ 1,862,288)
Net Value			\$ 8,502,898
Net Increased Value by Unitization			
Risk due to failure to recover 37%	(333,324)	(825,470)	(\$3,337,554)
Net Increased (Decreased) including risk	567,581	1,405,530	(\$2,030,367)
Tubb Reserve	49,870	3,955,000	\$3,578,300
Abo Reserve	102,900	688,000	1,646,810
Cost to Develop			(600,000)
Cost to Operate 240 mo. @ \$600			(144,000)
			\$2,450,743
Risk of loss due to water flood operation 50%			(\$2,612,500)
			(\$ 161,757)

Exhibit 4

Cleveland 1/1/1958
(Form C-101)

Section 14



Mail to Blinshley Oil and Drilling Company to which Form C-101 was sent no later than twenty days after completion of well. For instructions in Rules and Regulations of the Commission, see section QUINTUPLETAL. If State Land submit 6 copies.

AREA 640 ACRES
LOCATE WELL CORRECTLY

Marcham, Cone & Redfern

(Company or Operator)

Subbanks

(Lease)

Well No. 4, in SE 1/4 of SW 1/4, of Sec. 14, T-21-S, R-37-E, NAD 1983

Blinshley Oil and Drilling

Prop.

Les.

Well is 660 feet from South line and 1980 feet from West

of Section 14. If State Land the Oil and Gas Lease No. is Patented Land

Drilling Commenced October 30, 1959 Drilling was Completed December 15, 1959

Name of Drilling Contractor Sittren & Norton Drilling Company
Address Lubbock, TexasElevation above sea level at Top of Tubing Head 3409 THP; 3406 Gr; The information given is to be kept confidential unless
Not confidential 3414 DP; 3417 KBBlinshley OilOIL SANDS OR ZONESDrinkard Oil

No. 1, from 3688, 3702, 3750, 3769 & 3782 (total 30 holes perforated with	No. 4, from 6530-6568; to 6573-6578;
The Western Co. (Perforator)	No. 5, from 6581-6584; to 6587-6595;
No. 3, from to No. 6, from 6600-6608; & to 6615-6645	(all perforated 4 jet holes/foot)

IMPORTANT WATER SANDS

Include data on rate of water inflow and elevation to which water rose in hole.

No. 1, from None tested - rotary drilled hole to feet.
No. 2, from to feet.
No. 3, from to feet.
No. 4, from to feet.

CASING RECORD

SIZE	WEIGHT PER FOOT	NEW OR USED	AMOUNT	KIND OF SHOE	CUT AND PULLED FROM	PERFORATIONS	PURPOSE
9-5/8	36	New	1300'	Guide			Press str shut-off
7	20 - J	New	86.31	Pack-off			Production
7	23 - J	New	1931.27				
7	23 - M	M & SH	4620.95				
7-inch floating equipment			5.97				

MUDGING AND CEMENTING RECORD

SIZE OF HOLE	SIZE OF CASING	WHERE SET	NO. SACKS OF CEMENT	METHOD USED	MUD GRAVITY	AMOUNT OF MUD USED
13-3/8	9-5/8	1319	150 & 150	Pump & plug	9.5	Stage collar @ 2958
6-3/4	7	6568	440 & 500	Pump & plug	9.7	Stage collar @ 3703
5-5/8"X15' 6568	5-5/8"X15' 6570	Bottom hole, 5 retainer prod. pack with expandable plug set @ 5780'.				
5-5/8"Hydril 6570	5-5/8"Hydril 6570	Bottom hole, 14 retainer production packer set @ 6365'.				

Hydril tubing string latched to EUE tubing string with back parallel string anchor.

RECORD OF PRODUCTION AND STIMULATION

(Record the Process used, No. of Qu. or Gals. used, interval treated or shot.)

No natural tests. Tests after stimulation and load recovered as follows: Abo (open hole 6568-7350) - washed with 2000 gal; flowed 6.5 BOPH thru 3/4" choke; treated with 20,000 gal. Western Marifrac and 44,000 lbs. 20/40 sand; flowed 7 BOPH thru 3/4" choke. Drinkard perf 6530-6545; washed with 1000 gal; treated with 10,000 gal. Selufrac and 10,000 lbs. 20/40 sand; flowed 49 BOPD, GOR 1818. Blinshley Oil perf 5688-5782; treated with 30,000 gal. Selufrac and 42,000 lbs. 20/40 sand; flowed 270 BOPD thru 24/34" choke; GOR 1089; PCP 360; PIP 175.

Depth Cleaned Out 7350' TD
6700' PB

RECORD OF DRILL-STEM AND SPECIAL TESTS

If drill-stem or other special

or deviation surveys were made, submit description

of sheet and attach hereto.

TOOLS USED

Reamers were used from surface to **ID 7350**. Cutters were used from **ID 7350** to bottom. Total length of tools used from surface to bottom was 10,000 feet.

January 16, 1960 - Drinkard PRODUCTION

Put to Producing **January 25, 1960 - Blinberry 241**
49 - Drinkard **100**
278 - Blinberry Oil **100**

Oil Well: The production during the first 24 hours was 100 barrels of oil per day. The oil was 39.2° API. The water was 41.0° API. The water was 100% emulsion. The water was 100% sediment. A.P.I.

39.2° API - Drinkard; 41.0° API - Blinberry Oil

GAS WELL: The production during the first 24 hours was 100 barrels of gas per day. The gas was 100% oil. The gas was 100% water. The gas was 100% sediment. A.P.I.

DUAL OIL-OIL COMPLETION AUTHORIZED BY
 OCC Order No. DC 878 effective
January 27, 1960.

PLEASE INDICATE BELOW FORMATION TOPS (IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE):

Southeastern New Mexico

Northwestern New Mexico

1243	T. Devonian	1243	T. Alamogordo
1368	I. Shallow	1368	Kirtland-Fruitland
2505	T. Mancos	2505	Furnington
2561	T. Simpson	2561	Pictured Cliffs
3095	T. M. Keeler	3095	T. Permian
3228	T. Ellenburger	3228	Foothills Lookout
5155	T. Granites	5155	Wheeler
5435	T. OCC Blinberry Marker 5627	5435	Folsom
(?) 6083	T. ID 7350	(?) 6083	Alamo
(?) 6830	T. Devonian	(?) 6830	Alamo

FORMATION RECORD

Depth	Thickness In Feet	Formation	Time	Deviation In feet	Formation
0	11	Kelly bushing to ground			No drill stem tests were run in this well.
11	1243	Caliche & red beds			Deviation Record
1243	1232	Anhydrite			Depth Dev.
1232	1368	Salt with streaks anhydrite		226 1	Depth Dev.
1368	1137	Anhydrite, shale, salt		405 1/2	5580 3-3/4
1137	2505	and dolomite with streaks		806 3/4	5615 3-1/2
2505	2561	of sandstone		1250 1/4	5747 3-1/2
2561	3095	Dolomite and limestone		1319 3/4	5886 3-1/2
3095	3228	with thin streaks silt		1650 1/2	6036 3-1/2
3228	5155	and shale. Scattered		2556 1-3/4	6100 3-1/2
5155	5435	slight shows porosity		2741 2-1/4	6245 3-1/4
5435	(?) 6083	and oil staining from		8116 1	6311 3-1/2
(?) 6083	(?) 6830	5100 to 7350'.		8315 1/2	6347 3
(?) 6830				3648 1	6510 3
				3746 1	6633 2-3/4
				3855 1-1/4	6981 2-3/4
				4404 3/4	7196 2-1/4
				4557 3/4	
				4688 1/2	
				4874 3/4	
				4999 1	
				5103 1-1/2	
				5356 4	
				5377 4	
				5423 4	

A FORMER SEPARATE SHEET IF ADDITIONAL SPACE IS NEEDED

I declare or affirm that the information given herewith is complete and true to the best of my knowledge of the well and all work done on it so far completed and based upon available records.

February 1, 1960
 1706 Great Plains Life Building
 Lubbock, Texas

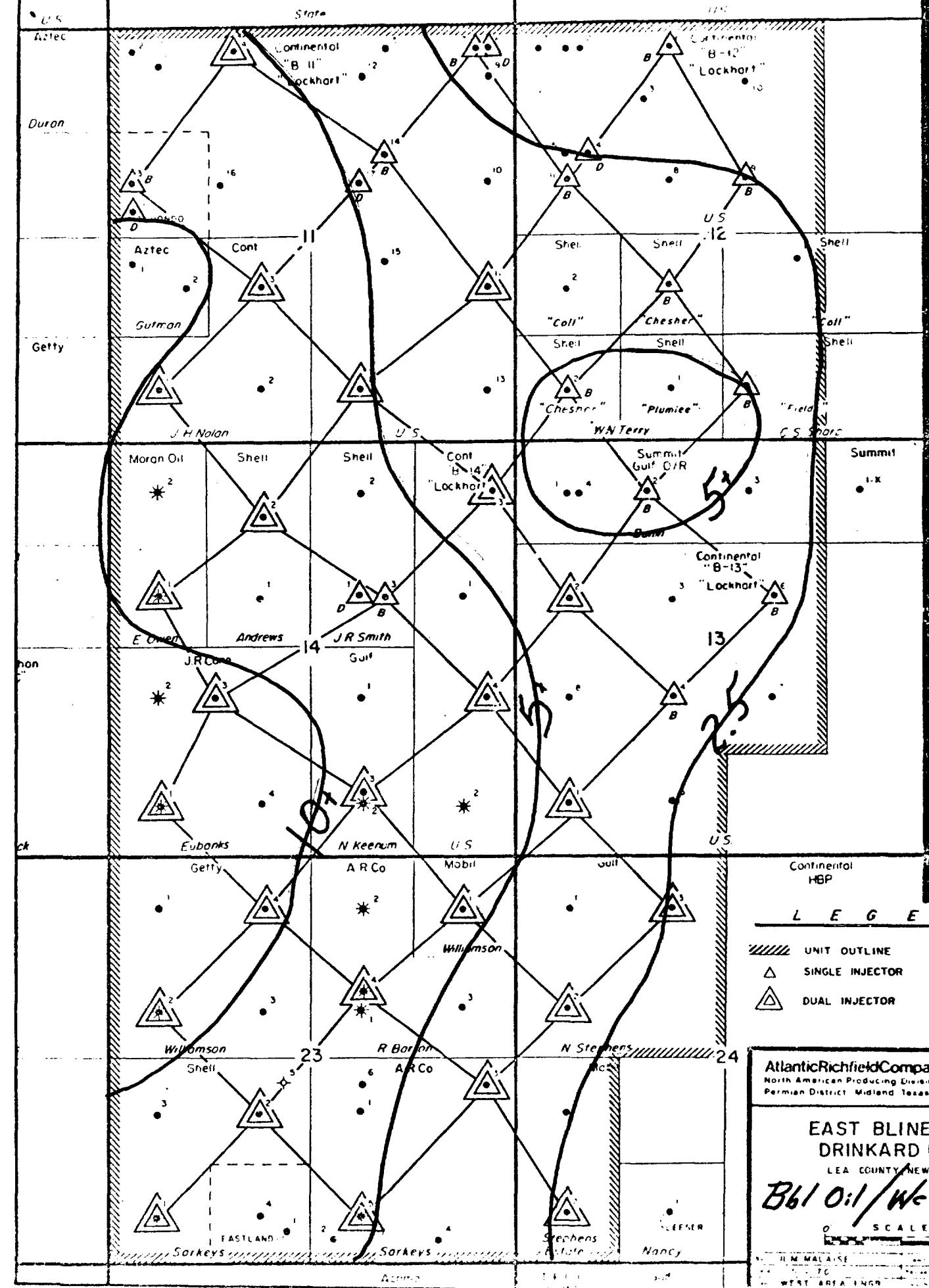
Markham, Cone & Redfern

Professional Engineer

L. O. Storm

Exhibit 5

R 37 E

T
21
S

LEGEND

- | | |
|---|-----------------|
| ■ | UNIT OUTLINE |
| △ | SINGLE INJECTOR |
| ▲ | DUAL INJECTOR |

AtlanticRichfieldCompany
North American Producing Division
Permian District - Midland, Texas

EAST BLINBRY &
DRINKARD UNITS

LEA COUNTY, NEW MEXICO

B6101/Well Day

0 SCALE 2000'

H M MALAISE
TC
WEST AREA ENGR

Exhibit 6

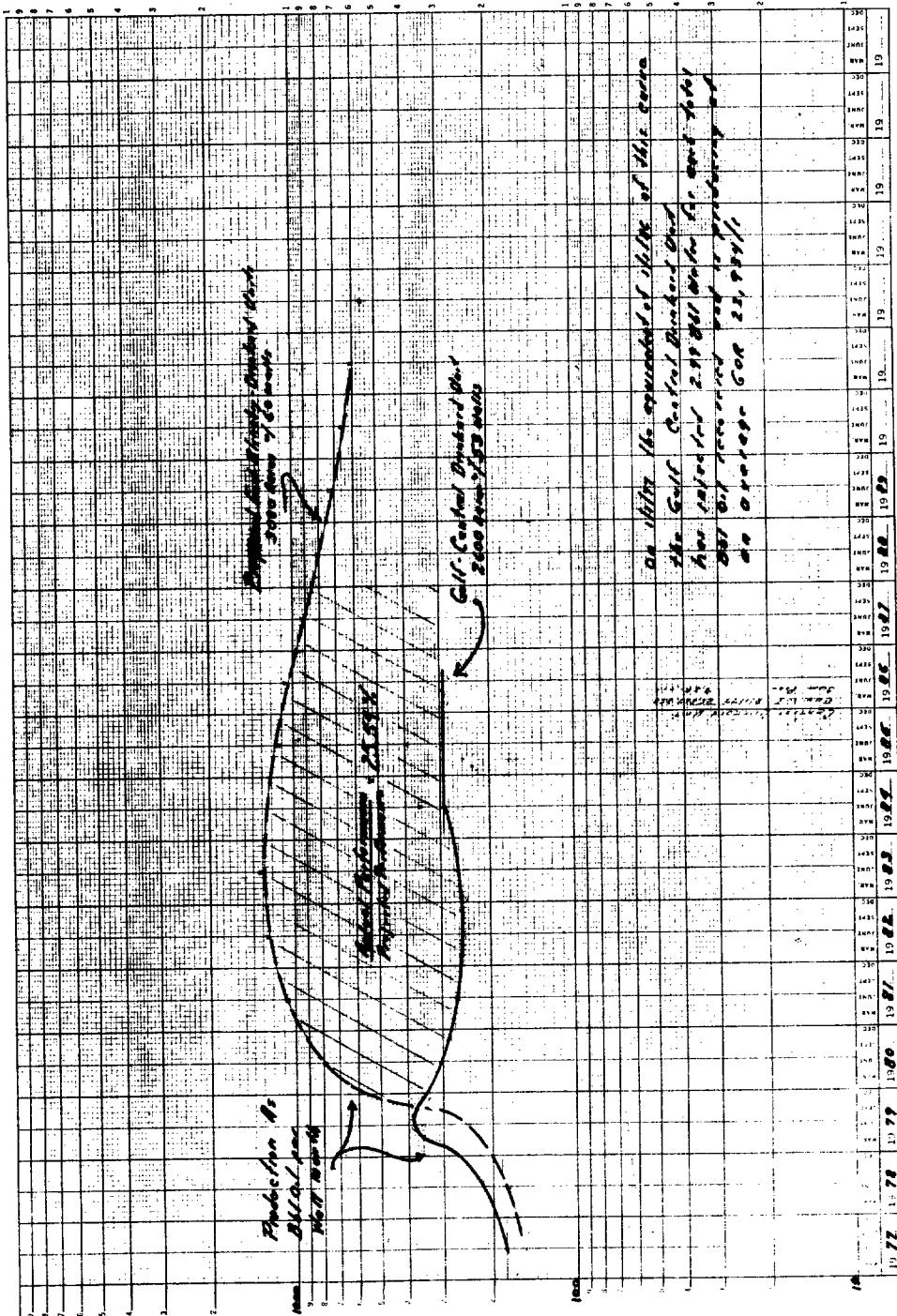
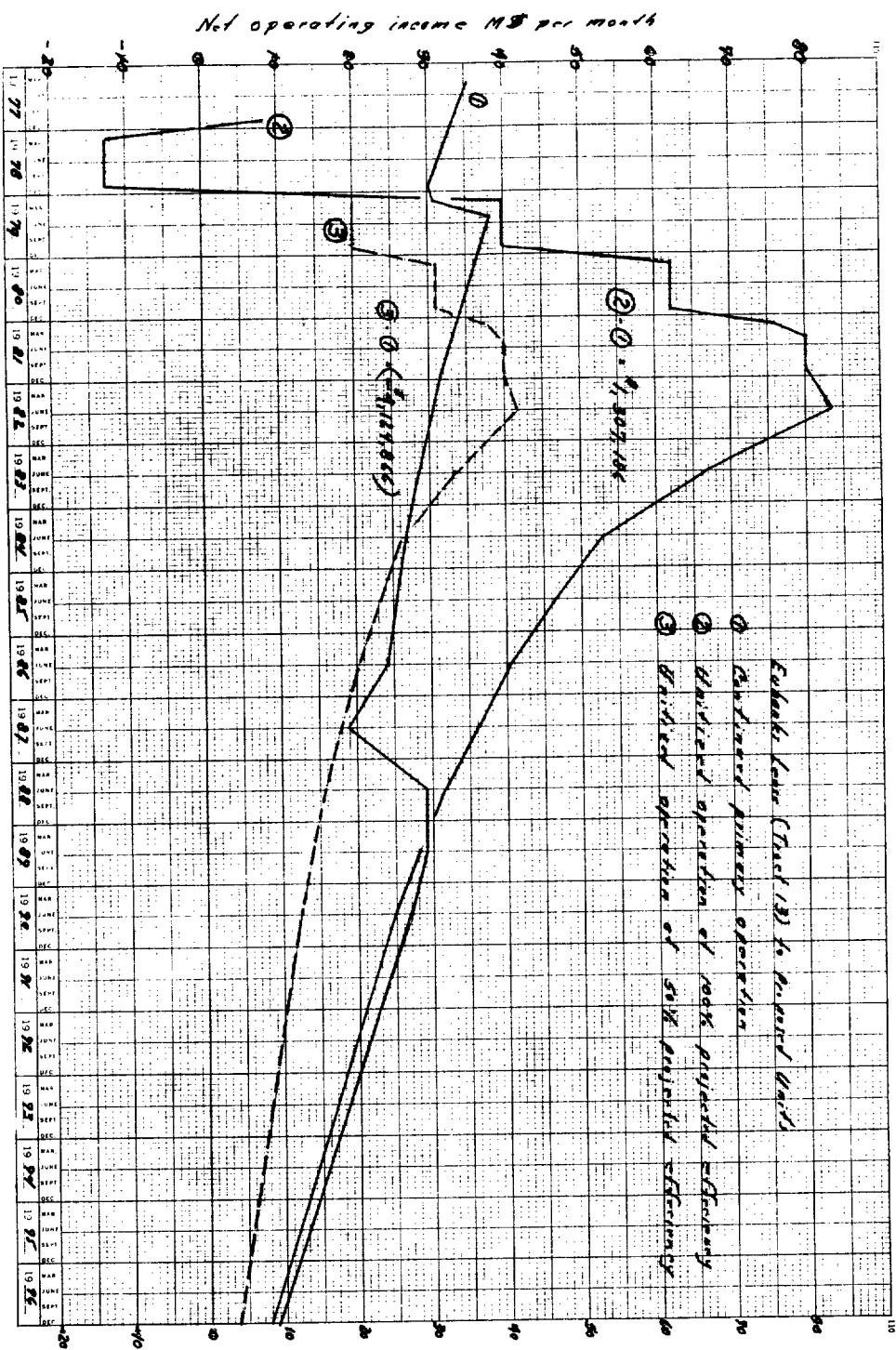
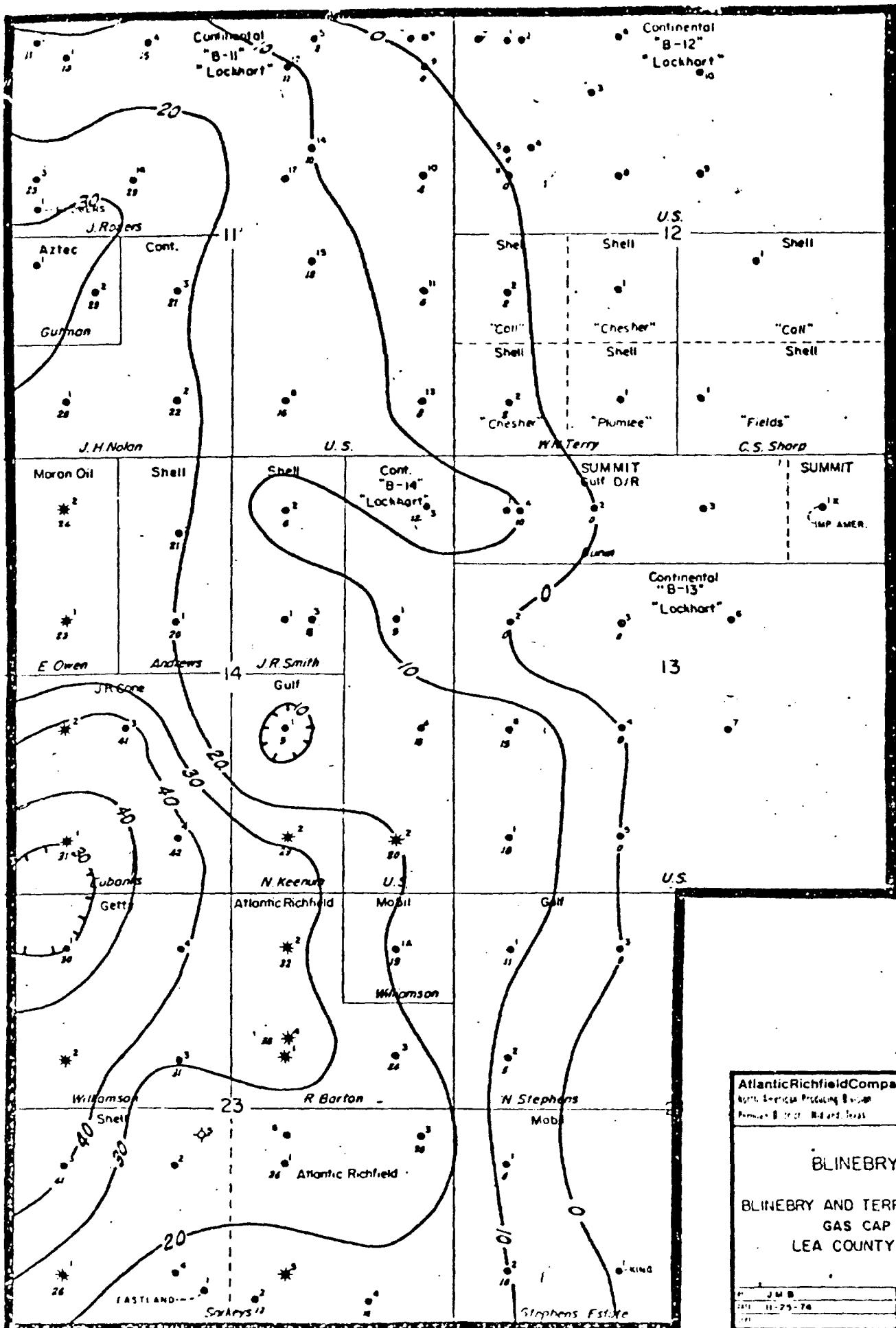


Exhibit 7





Atlantic Richfield Company
North America Producing Division
Formerly Standard Oil Company

BLINEBRY UNIT

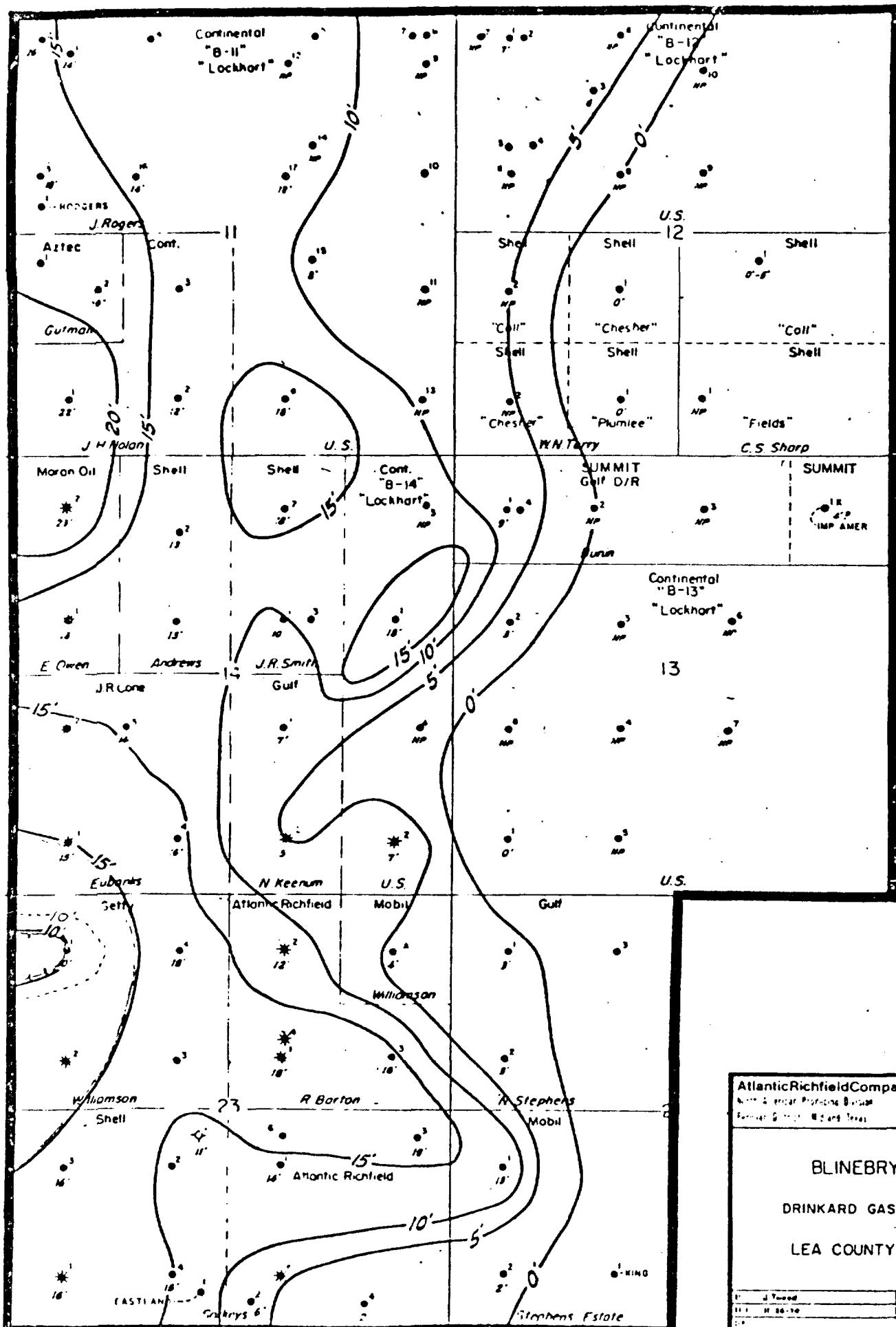
BLINEBRY AND TERRY-BLINEBRY POOL
GAS CAP ISOPACH
LEA COUNTY, NEW MEXICO

JMB	James E. Wiggins
11-29-74	11-29-74

Added to Group G Page Control Hg 1-15-7

R 37 E

Exhibit 9



Atlantic Richfield Company
North American Refining Division
Formerly Standard Oil Company of New Jersey



BLINBRY UNIT

DRINKARD GAS CAP ISOPACH

LEA COUNTY, NEW MEXICO

11	12	13	14	15	16	17	18	19	20	21	22
11	12	13	14	15	16	17	18	19	20	21	22

Added 15' Contour @ Edge Cont = Hwy 1-15-7
Moved 16' Contour @ Edge Cont = Hwy 1-15-7

Exhibit 10

EUBANKS LEASE
OPERATING COST 1976

	<u>Operating Cost</u>	<u># of Wells</u>	<u>\$ per Well</u>
January	\$ 3,666.52	7 Wells	\$ 523.79
February	1,855.00	" "	265.00
March	2,020.92	" "	288.70
April	25,213.28	" "	3,601.90
May	18,038.46	" "	2,576.92
June	2,702.74	" "	386.11
July	2,023.38	" "	289.05
August	1,960.75	" "	280.11
September	1,273.65	" "	181.95
October	2,507.31	" "	358.19
November	1,437.79	" "	205.40
December	<u>1,837.85</u>	<u>" "</u>	<u>262.55</u>
TOTALS	\$64,537.65	7 Wells	\$9,219.67

LESS: Charges
Pumping Unit
Lufkin C320D
April & May: 39,279.29
TOTAL \$25,258.36

Average Cost
Per Well Per Month: \$300.70

**EUBANKS LEASE
OPERATING COST 1977**

	<u>Operating Cost</u>	<u># of Wells</u>	<u>\$ per Well</u>
January	\$ 2,254.91	7 Wells	\$ 322.13
February	1,363.16	" "	194.74
March	1,777.95	" "	253.99
April	2,782.13	" "	397.45
May	2,273.82	" "	324.83
June	1,460.08	" "	208.58
July	2,790.35	" "	398.62
August	2,137.94	" "	305.42
September	<u>1,845.08</u>	<u>" "</u>	<u>263.58</u>
TOTALS	\$18,685.42	7 Wells	\$2,669.34

Average Cost
Per Well Per Month: \$296.59

