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December 29, 1997

Hand Delivered

Florene Davidson
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Florene:

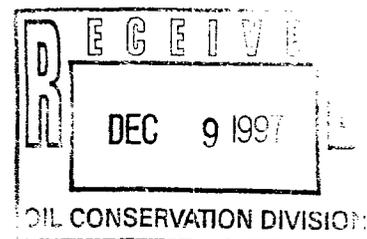
Enclosed are an original and two copies of an application for approval of a unit agreement, and a proposed advertisement, filed on behalf of Pogo Producing Company. Please set this matter for the January 22, 1998 Examiner hearing. Thank you.

Very truly yours,



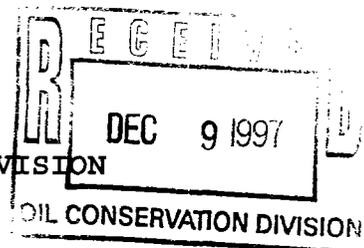
James Bruce

Attorney for Pogo
Producing Company



11911

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION



APPLICATION OF POGO PRODUCING COMPANY
COMPANY FOR APPROVAL OF A UNIT AGREEMENT,
LEA COUNTY, NEW MEXICO.

No. 11911

APPLICATION

Pogo Producing Company hereby applies for an order approving an exploratory unit agreement, and in support thereof states:

1. Applicant proposes to form the Longbow Unit, covering all depths under the following federal and fee land:

Township 21 South, Range 32 East, N.M.P.M.

Section 25: S $\frac{1}{2}$
Section 35: SE $\frac{1}{4}$
Section 36: All

Containing 1,120 acres, more or less.

2. Applicant requests that it be designated operator of the unit.

3. Applicant is obtaining preliminary approval of the unit agreement from the Bureau of Land Management.

4. The proposed unitization is in the interests of conservation, and will prevent waste and protect correlative rights.

WHEREFORE, Applicant requests that the Division enter its order:

- A. Approving the unit agreement covering the above-described land;
- B. Designating applicant as operator of the unit; and
- C. Granting such further relief as the Division deems proper.

Respectfully submitted,

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above a horizontal line.

James Bruce
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Attorney for Pogo Producing Company