

DATE IN 5-12-04	SUSPENSE 6/1/04	ENGINEER Stagner	LOGGED 5/12-5/13/04	TYPE NSL
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ABOVE THIS LINE FOR DIVISION USE ONLY

PSEM 0413440500

NEW MEXICO OIL CONSERVATION DIVISION
- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

Application Acronyms:

- [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location]
- [DD-Directional Drilling] [SD-Simultaneous Dedication]
- [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
- [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
- [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
- [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
- [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Directional Drilling
 NSL NSP DD SD

Check One Only for [B] and [C]

- [B] Commingling - Storage - Measurement
DHC CTB PLC PC OLS OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
WFX PMX SWD IPI EOR PPR

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

- [A] Working, Royalty or Overriding Royalty Interest Owners
- [B] Offset Operators, Leaseholders or Surface Owner
- [C] Application is One Which Requires Published Legal Notice
- [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] Waivers are Attached

[3] **INFORMATION / DATA SUBMITTED IS COMPLETE** - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

A. M. Howell		Advisor Petro. Engineer	4/12/2004
Print or Type Name	Signature	Title	Date

Permian Business Unit
North America Upstream
15 Smith Road
Midland, Texas 79705
Tel (432) 687 7516
MAHO@chevrontexaco.com

May 5, 2004

ChevronTexaco

Request For Administrative Approval
Of Unorthodox Oil Well Location And
Simultaneous Dedication

RECEIVED

Mr. Michael E. Stogner
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

MAY 12 2004

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Dear Mr. Stogner:

ChevronTexaco respectfully requests administrative approval of an unorthodox oil well location for the following well:

W. T. McComack # 20
1190' FSL & 1400' FEL, SW/4 SE/4 of
Section 32, T21S, R37E, Unit Letter O
Lea County, New Mexico

The proposed well will be as an infill producer in the Penrose Skelly; Grayburg Pool, which is an oil pool spaced on 40 acres. This well is a follow-up to recent similar infill drilling by Apache Corporation in the same Pool. ChevronTexaco is a working interest partner in several of their recent infill wells and supports their contention that typical Grayburg wells cannot drain 40 acres. ChevronTexaco's technical analysis of the reservoir revealed similar results to Apache's.

The SW/4 SE/4 of Section 32 will be simultaneously dedicated in the Penrose Skelly; Grayburg Pool to the proposed well and to the existing W. T. McComack # 4. ChevronTexaco also requests approval of the simultaneous dedication.

This application is based on geological and engineering analysis. That analysis and justification for this request is attached as Exhibit 1, along with other supporting documentation. There are five wells that have produced or are producing the Grayburg Formation in the SE/4 of Section 32. The proposed well will be located in the approximate center of those wells. Based on drainage calculations, ChevronTexaco believes that drilling the infill well will recover reserves that would not be recovered by the existing Grayburg wells.

A land plat highlighting the proposed well's location is attached as Exhibit 2. The E/2 of Section 32 is covered by a single fee lease and has **common royalty and working interest ownership**. For that reason and the proposed location of the infill well, there are no adversely affected interest owners and no one has been notified of this application.

May 5, 2004
Page 2

If you have any questions concerning this application or need additional information, please contact me by telephone at (432) 687-7516 or by e-mail at MAHO@chevrontexaco.com. Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Mike Howell". The signature is written in a cursive, flowing style.

Mike Howell
Advisor Petroleum Engineer

Attachments

cc: NMOCD District 1 – Hobbs, NM
Mike Howell
Well File

NOTIFICATION LIST

Application Of Chevron U.S.A. Inc. For Administrative Approval Of An Unorthodox Oil Well Location And Simultaneous Dedication:

W. T. McComack # 20
1190' FSL & 1400' FEL
Section 32, T21S, R37E, Unit Letter O
Lea County, New Mexico

Offset Operators, Working Interest Owners, E/2 Section 32:

1. Chevron U.S.A. Inc. Operator/100% WI
15 Smith Road
Midland, TX 79705

EXHIBIT 1

ENGINEERING AND GEOLOGICAL JUSTIFICATION

Application Of Chevron U.S.A. Inc. For Administrative Approval Of An Unorthodox Oil Well Location And Simultaneous Dedication:

W. T. McComack # 20
1190' FSL & 1400' FEL
Section 32, T21S, R37E, Unit Letter O
Lea County, New Mexico

PRIMARY OBJECTIVE: GRAYBURG

SUPPORTING DATA:

1. Chevron U.S.A. Inc. (Chevron) is the operator of the proposed W. T. McComack # 20 well (Exhibit 3). The proposed total depth is 4000' in the top of the San Andres formation.
2. The completion will be in the Penrose Skelly; Grayburg Oil Pool and the proposed location encroaches toward the following wells (Exhibit 4).

Operator	Well	Location	Formation	Cum Prod		Current Prod		Status
				MBO	MMCF	BOPD	MCFPD	
Chevron	W. T. McComack # 3	32-P	Grayburg	94	877	9	487	Producing
Chevron	W. T. McComack # 4	32-O	Grayburg	84	442	1	105	Producing
Chevron	W. T. McComack # 6	32-J	Grayburg	77	463	19	445	Producing
Chevron	W. T. McComack # 7	32-I	Grayburg	33	0			P&A
Chevron	W. T. McComack # 17	32-I	Grayburg	2	47	23	778	Producing

3. The proposed W. T. McComack # 20 unorthodox Grayburg location is based primarily on drainage considerations:
 - a. Grayburg Reservoir

The Grayburg is a series of alternating subtidal and supratidal dolomites, with the subtidal rock having porosity and hydrocarbons and the supratidal rock being tight. The Grayburg depositional environments varied rapidly so that many porous and tights intervals are not continuous from well-to-well on 40-acre spacing. Tight dolomite and/or anhydrite intervals within the Grayburg create vertical and horizontal flow barriers between different zones of porosity. Additionally, average porosity of the Grayburg is less than 10%, and average permeability is less than 1 millidarcy. For all of these reasons, Grayburg wells are not usually capable of draining a 40-acre proration unit.

The reservoir was analyzed by mapping Hydrocarbon Pore Volume (HCPV) (Exhibit 5). HCPV is the product of feet of net pay (h) times average porosity (phi) times oil saturation (So). The map is the arithmetic product of grids interpreted from those values. The values were obtained as follows:

1. Net pay was read from either modern neutron-density logs or estimated from a map developed from gross pay times net-to-gross ratio (Exhibit 4).
2. Average porosity was calculated from modern well logs using a minimum of 6% crossplot porosity and a maximum of 20%.
3. Oil saturation was calculated from a fractional flow curve using representative water cut values.

The following table provides drainage areas calculated from the HCPV map and reserves of the offsetting wells.

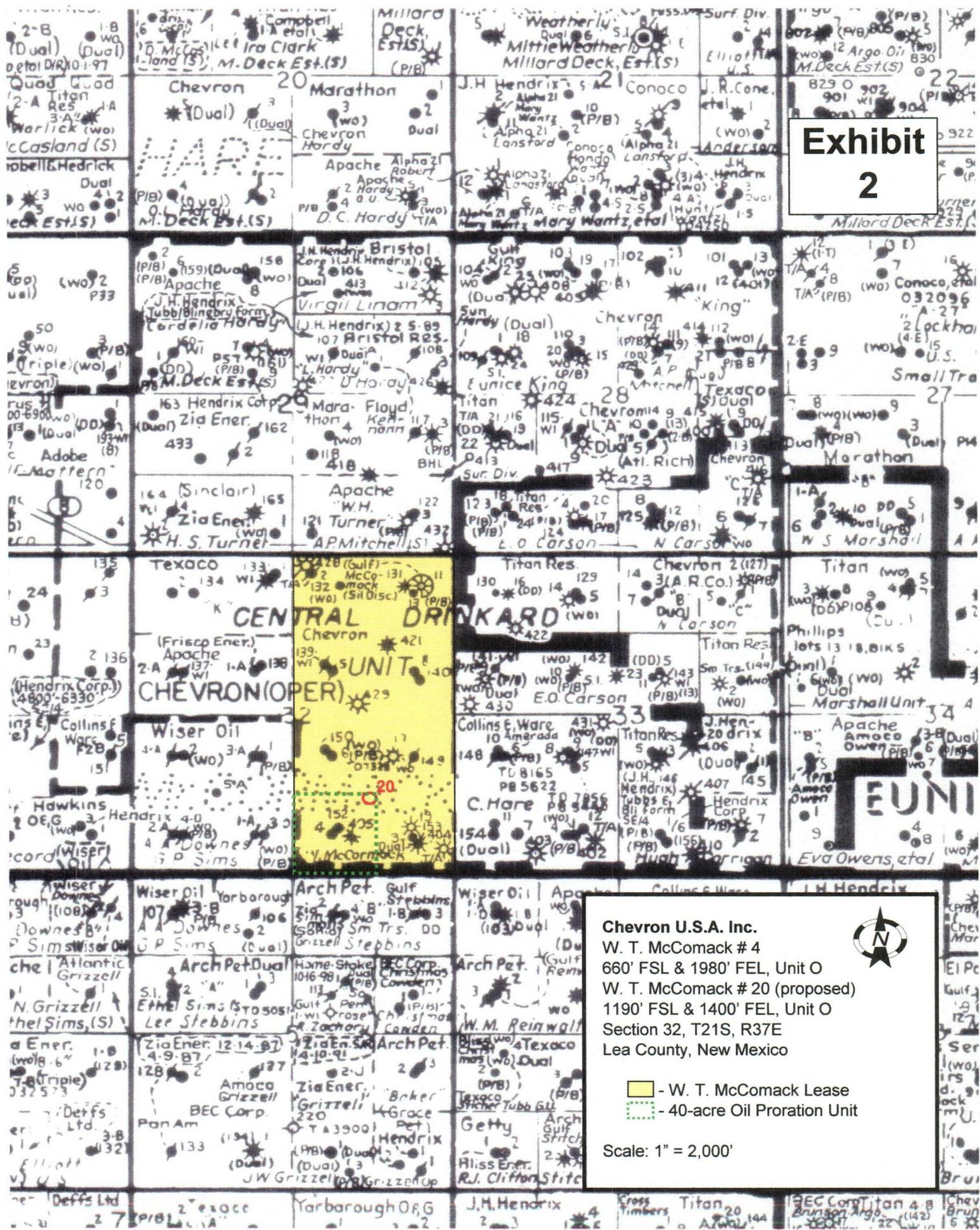
Operator	Well	Location	Formation	Drainage Acres	EUR	
					MBO	MMCF
Chevron	W. T. McComack # 3	32-P	Grayburg	13	98	972
Chevron	W. T. McComack # 4	32-O	Grayburg	15	85	441
Chevron	W. T. McComack # 6	32-J	Grayburg	13	77	469
Chevron	W. T. McComack # 7	32-I	Grayburg	6	33	0
Chevron	W. T. McComack # 17	32-I	Grayburg	8	11	532

As can be seen above, the average drainage area of the offsetting wells is only 11 acres, and additional reserves can be recovered by drilling the proposed well, W. T. McComack # 20, at an infill location approximately equidistant from the offsetting Grayburg producers. Reserves for the proposed location were calculated using the HCPV map, a 11 acre drainage area, and a 15% recovery factor. The results are as follows:

Operator	Well	Location	HCPV	Drainage Acres	EUR	
					MBO	MMCF
Chevron	W. T. McComack # 20	32-O	6.81	11	64	475

4. The E/2 of Section 32 is covered by a single fee lease and has common royalty and working interest ownership. Chevron is the operator and 100% working interest owner of the Grayburg wells toward which the proposed well will encroach. Therefore, there are no offset interest owners or adversely affected parties to notify of this application.
5. The proposed W. T. McComack # 20 will share a 40-acre proration unit and be simultaneously dedicated with the W. T. McComack # 4, a current Penrose Skelly; Grayburg producer in Section 32, Unit Letter O.
6. Approval of this application will allow for the recovery of oil and gas reserves which would not otherwise be recovered.

Exhibit 2



Chevron U.S.A. Inc.
 W. T. McComack # 4
 660' FSL & 1980' FEL, Unit O
 W. T. McComack # 20 (proposed)
 1190' FSL & 1400' FEL, Unit O
 Section 32, T21S, R37E
 Lea County, New Mexico



- W. T. McComack Lease
- 40-acre Oil Proration Unit

Scale: 1" = 2,000'

DISTRICT I
P. O. Box 1980, Hobbs, NM 88240

DISTRICT II
P. O. Drawer DD, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV
P. O. Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals and Natural Resources Department

EXHIBIT
3

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Submit to Appropriate District Office
State Lease-4 copies
Fee Lease-3 copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number		² Pool Code		³ Pool Name Penrose Skelly (Grayburg)					
⁴ Property Code		⁵ Property Name W.T. McComack						⁶ Well Number 20	
⁷ GRID No. 22351		⁸ Operator Name CHEVRON USA, Inc.						⁹ Elevation 3470'	
¹⁰ Surface Location									
UL or lot no. 0	Section 32	Township 21-S	Range 37-E	Lot Idn	Feet from the 1190'	North/South line South	Feet from the 1400'	East/West line East	⁷ County Lea
¹¹ Bottom Hole Location If Different From Surface									
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	⁷ County
¹² Dedicated Acres 40		¹³ Joint or Infill		¹⁴ Consolidation Code		¹⁵ Order No.			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION.

¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Signature _____

Printed Name
Ted Tipton

Position
Manager of Drilling Department

Company
Chevron USA, Inc.

Date
May 1, 2004

¹⁸ SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed
April 22, 24, 26, & 27, 2004

Signature & Seal of Professional Surveyor

Certificate No.
7254 John S. Piper

Sheet **1 of 1**

○ = Staked Location ● = Producing Well = Injection Well ◊ = Water Supply Well ⊕ = Plugged & Abandon Well
 ⊙ = Found Section Corner, 2 or 3" Iron Pipe & GLO B.C. ○ = Found /4 Section Corner, 1" Iron Pipe & GLO B.C.

ADDITIONAL INFORMATION ON THE LOCATION

State Plane Coordinates			
Northing 522594.17 (1927= 522534.81)	Easting 896845.08 (1927= 855660.52)		
Latitude 32°25'53.065" (1927= 32°25'52.631")	Longitude 103°10'51.945" (1927= 103°10'50.256")		
Zone North American Datum	Combined Grid Factor 0.9998868	Coordinate File Weathrly.cr5	
East 1983	Field Book Lea #23, Pg. 46		
Drawing File Chevron-Eunice.Dwg			

District I
1625 N. French Dr., Hobbs, NM 88240

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised March 17, 1999

District II
811 South First, Artesia, NM 88210

OIL CONSERVATION DIVISION Submit
2040 South Pacheco
Santa Fe, NM 87505

**EXHIBIT
3.1**

District III
1000 Rio Brazos Rd., Aztec, NM 87410

AMENDED REPORT

District IV
2040 South Pacheco, Santa Fe, NM 87505

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-025-06933		² Pool Code 50350		³ Pool Name Penrose Skelly; Grayburg	
⁴ Property Code 2690		⁵ Property Name W. T. McComack			⁶ Well Number 4
⁷ OGRID No. 4323		⁸ Operator Name Chevron U.S.A., Inc.			⁹ Elevation 3481' GL

¹⁰ Surface Location

UL or Lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
O	32	21S	37E		660	South	1980	East	Lea

¹¹ Bottom Hole Location If Different From Surface

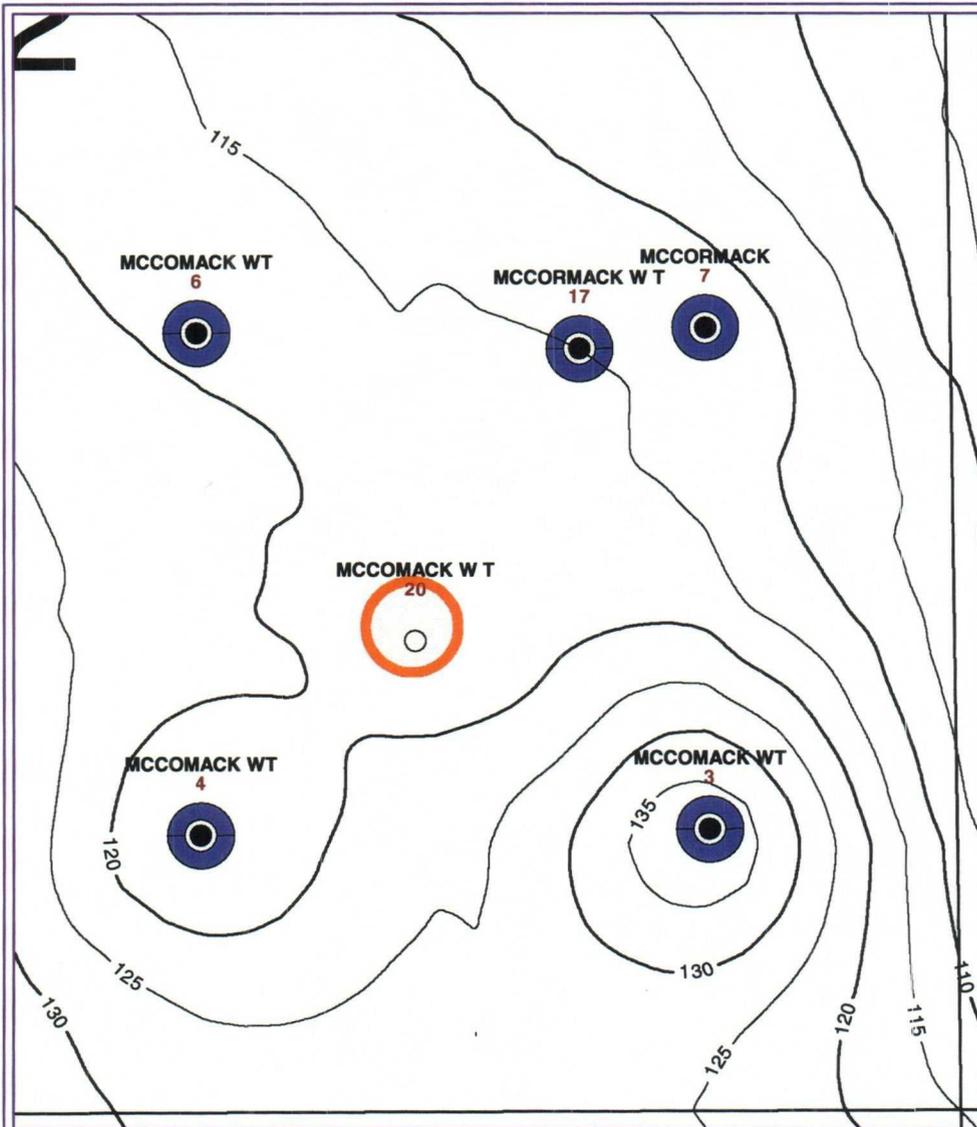
UL or Lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres 40	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

16	W. T. McComack Lease		<p>1</p> <p>OPERATOR CERTIFICATION</p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</i></p> <p><i>A. M. Howell</i></p> <p>Signature A. M. Howell</p> <p>Printed Name Advisor Petr. Engineer</p> <p>Title May 5, 2004</p>	
				<p>1</p> <p>SURVEYOR</p> <p><i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i></p> <p>Signature and Seal of Professional Surveyor:</p>
	<p>40-acre proration unit</p>			

Certificate



PETRA 5/6/2004 3:22:40 PM

ChevronTexaco

EXHIBIT 4

21S-37E-32 SE/4 Lea County, New Mexico

Grayburg Net Pay CI=5'

Cutoffs: Gr <= 40 API, Porosity >= 6%

ATTRIBUTE MAP

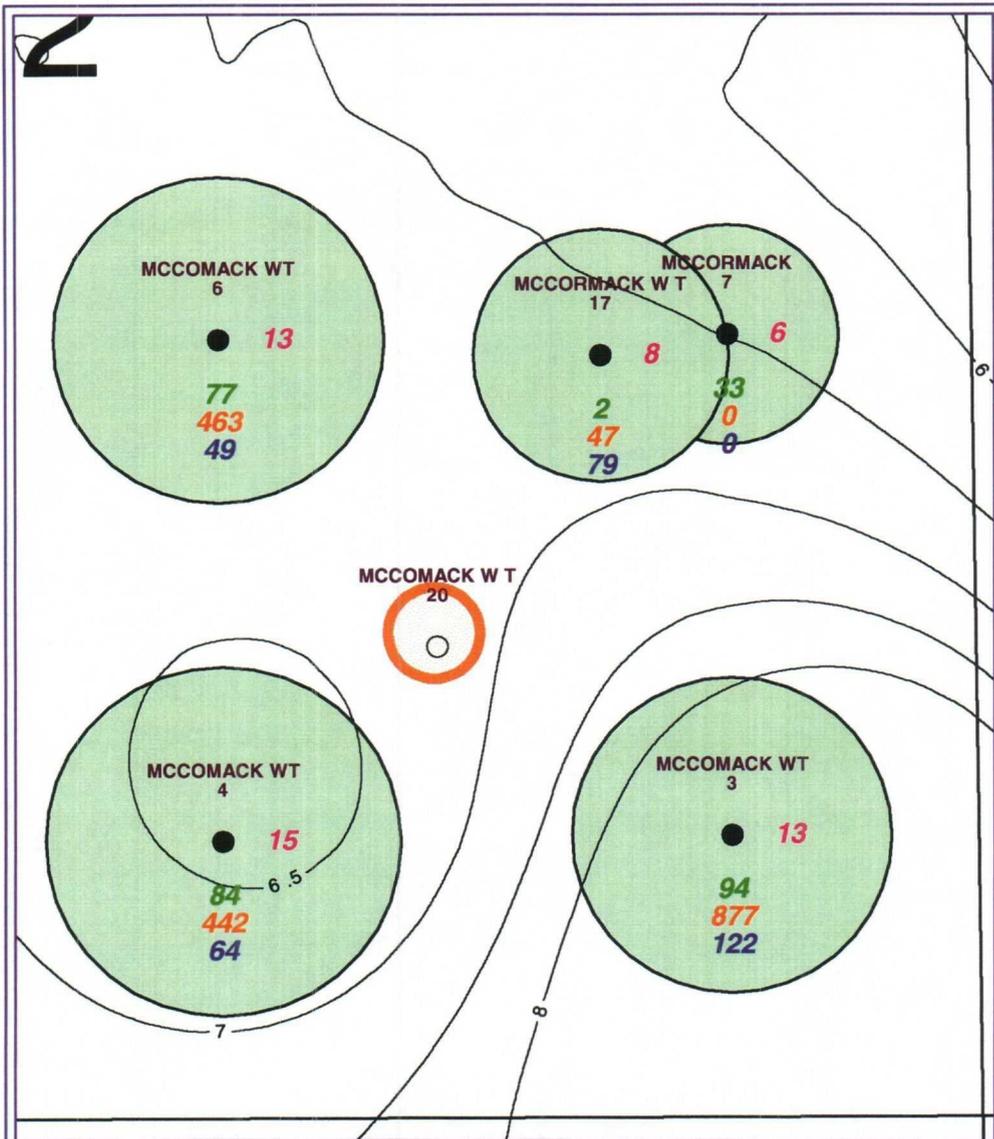


- Zone: PRODUCTION - O_453GRBG IS PRESENT
- Zone: PRODUCTION - G_453GRBG IS PRESENT



FEET

May 6, 2004



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ChevronTexaco

EXHIBIT 5

21S-37E-32 sE/4 Lea County, New Mexico

Grayburg HCPV CI=.5 & EUR-Drainage

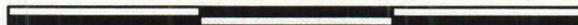
POSTED WELL DATA

Well Name
Well Number

● EUR-GRAYBURG-ACRES

Grayburg Cum Oil (MBO)
Grayburg Cum Gas (MMCF)
Grayburg Cum Water (MBW)

0 500 1,000 1,500



FEET

May 6, 2004