

Susp: 4-5-2005

PMESD - 509136055

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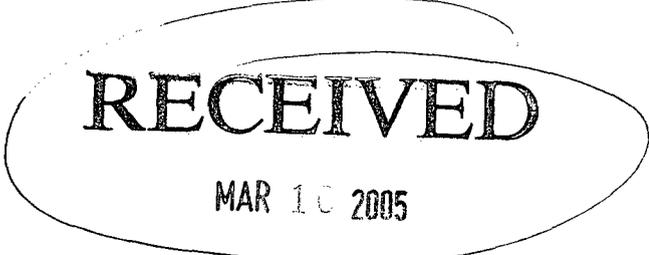
TWO WARREN PLACE / SUITE 1500 / 6120 SOUTH YALE / TULSA, OK 74136-4224



WWW.APACHECORP.COM

March 14, 2005

Attn: Michael E. Stogner  
Engineering Bureau  
New Mexico Oil Conservation Division  
1220 S St. Francis Drive  
Santa Fe, NM 87505



Re: Request for Amended NSL Order  
Non Standard Location No. 4115-A  
Turner No. 19 (API 30-025-35830)  
Section 22, Township 21S, Range 37E  
Lea County, NM

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

Apache Corporation respectfully requests administrative approval to amend NSL Order No. 4115-A, approved unorthodox Paddock location. This order exists only for the Paddock Pool (49210) and we wish to include the Penrose Skelly; Grayburg (50350) Pool.

To support this request we submit the following information:

- 1) Apache Corporation owns and operates the Turner No. 19 (30-025-35830), located on our Turner Lease which consists of the S/2 of Section 22. The 40 acre proration unit consists of the NW/4 of the SE/4 of Section 22. This well was approved for unorthodox location in the Paddock Pool. The well has already been drilled and would allow us to produce reserves in the Grayburg Pool. There are no offset Operators therefore no other Operator is affected by this request. Any encroachment is limited to additional acreage on our Turner lease and Northeast Drinkard leases which are owned and operated by Apache.
- 2) The Turner No. 19 is located 1065' south and 1450' west of the nearest Turner boundaries and 1575' FSL & 1450' FEL of Section 22, Township 21S, Range 37E. This location is unorthodox in that Rule 104.C (1) of the General Rules of the Oil Conservation Division which requires wells on 40 acre spacing and proration units to be located no closer that 330' to any boundary of such tract nor closer than 330' to the nearest well capable of producing from the same Pool. The current location is 200' east and 75' south of a "Standard Location" and 118' from the Apache Corporation's Northeast Drinkard Unit No. 923, which is completed in the deeper Eunice - Blinbery - Tubb - Drinkard - North Pool.
- 3) Apache Corporation's Turner Lease consists of 320 acres in the S/2 of Section 22.

- 4) The NMOCD Form C-102 for the Turner No. 19 is attached. Also attached are plats of Section 22 with the Turner Lease outlined and footage noted.

Your prompt consideration in approving this Administrative Order amendment for the Turner No. 19 well in the Penrose Skelly; Grayburg Pool is greatly appreciated.

Please do not hesitate to contact me if you have any questions.

Respectfully,

APACHE CORPORATION

A handwritten signature in black ink, appearing to read 'Rick Crist', written over a horizontal line.

Rick Crist  
Production Engineer  
918.491.4800

Attachments

cc: New Mexico Oil Conservation Division  
District I  
1625 N. French Drive  
Hobbs, New Mexico 88240

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88211-0719

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

DISTRICT IV  
P.O. BOX 2088, SANTA FE, N.M. 87504-2088

State of New Mexico  
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

Form C-102  
Revised February 10, 1994  
Submit to Appropriate District Office  
State Lease - 4 Copies  
Fee Lease - 3 Copies

WELL LOCATION AND ACREAGE DEDICATION PLAT  AMENDED REPORT

API Number	Pool Code 49210	Pool Name Paddock
Property Code 22880	Property Name TURNER	Well Number 19
OGRID No. 000873	Operator Name APACHE CORPORATION	Elevation 3407'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	22	21-S	37-E		1575	SOUTH	1450	EAST	LEA

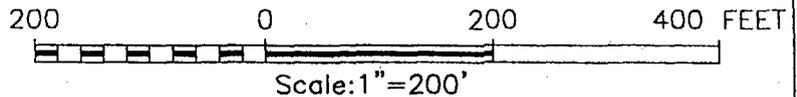
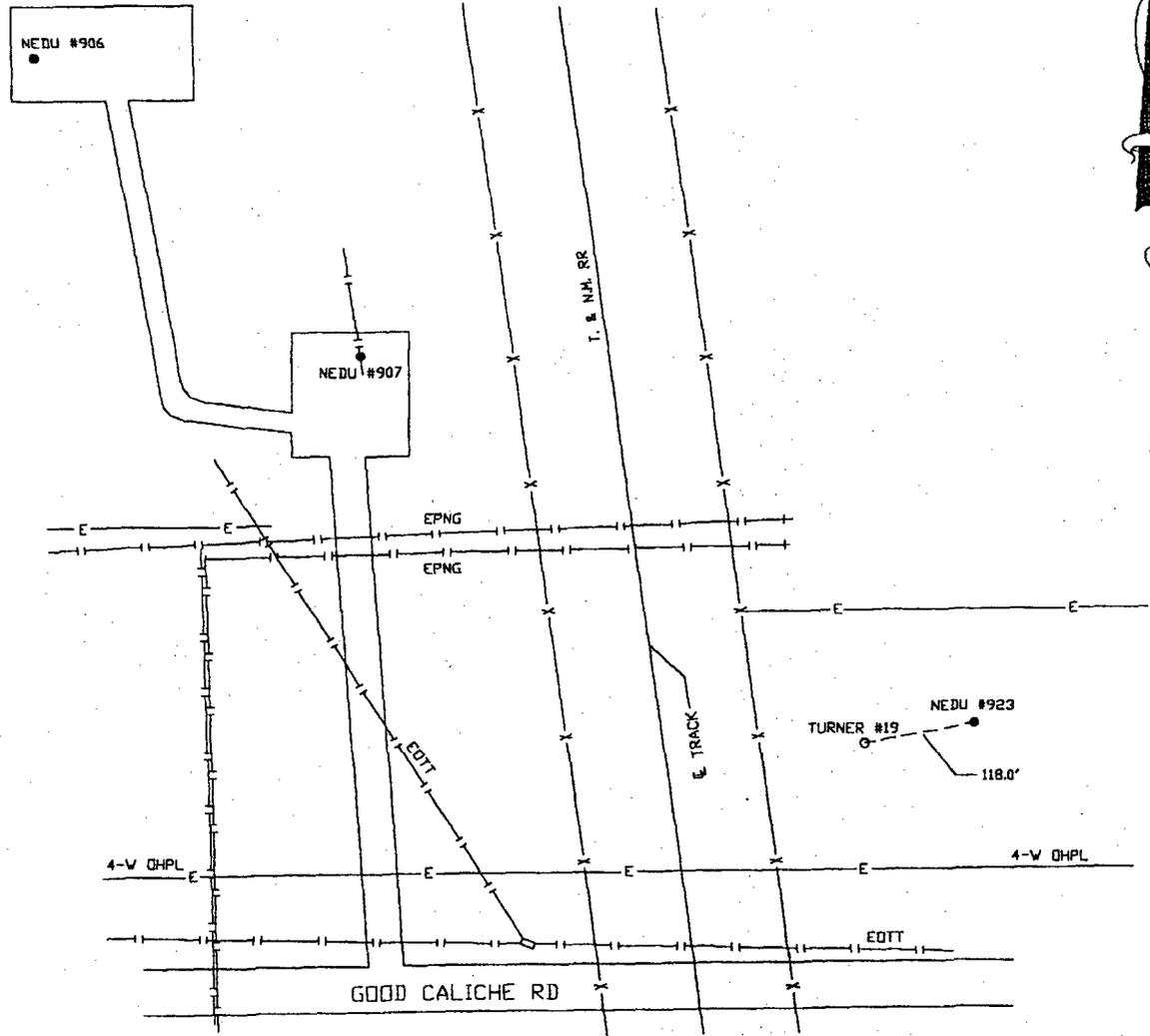
Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres 40	Joint or Infill	Consolidation Code	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

	<p><b>OPERATOR CERTIFICATION</b></p> <p><i>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</i></p> <p><i>Debra J. Anderson</i> Signature</p> <p>Debra J. Anderson Printed Name</p> <p>Sr. Engineering Technician Title</p> <p>1/18/02 Date</p>
	<p><b>SURVEYOR CERTIFICATION</b></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>DECEMBER 18, 2001 Date Surveyed</p> <p>LA Signature &amp; Seal of Professional Surveyor</p> <p><i>Gary J. Edson</i> Signature</p> <p>01-11-1297 Date</p>
	<p>Certificate No. RONALD J. EDSON 3239 GARY EDSON 12841</p>
	<p>TURNER #19</p> <p>NEDU #923</p> <p>1450'</p> <p>118.0'</p> <p>1575'</p>

SECTION 22, TOWNSHIP 21 SOUTH, RANGE 37 EAST, N.M.P.M.,  
LEA COUNTY, NEW MEXICO.



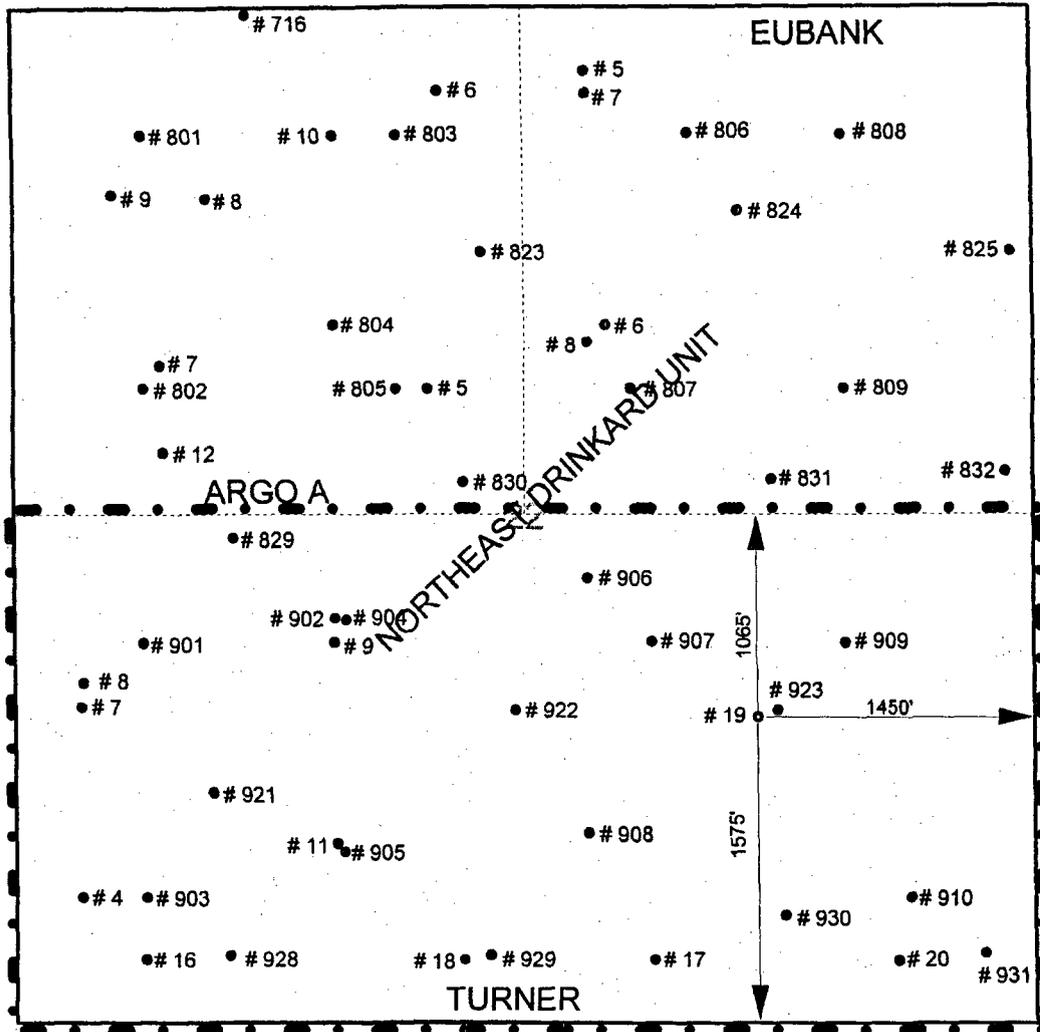
GEOGRAPHIC LOCATION NAD 27  
LAT. 32°27'40.88"N  
LONG. 103°08'47.60"W

APACHE CORPORATION

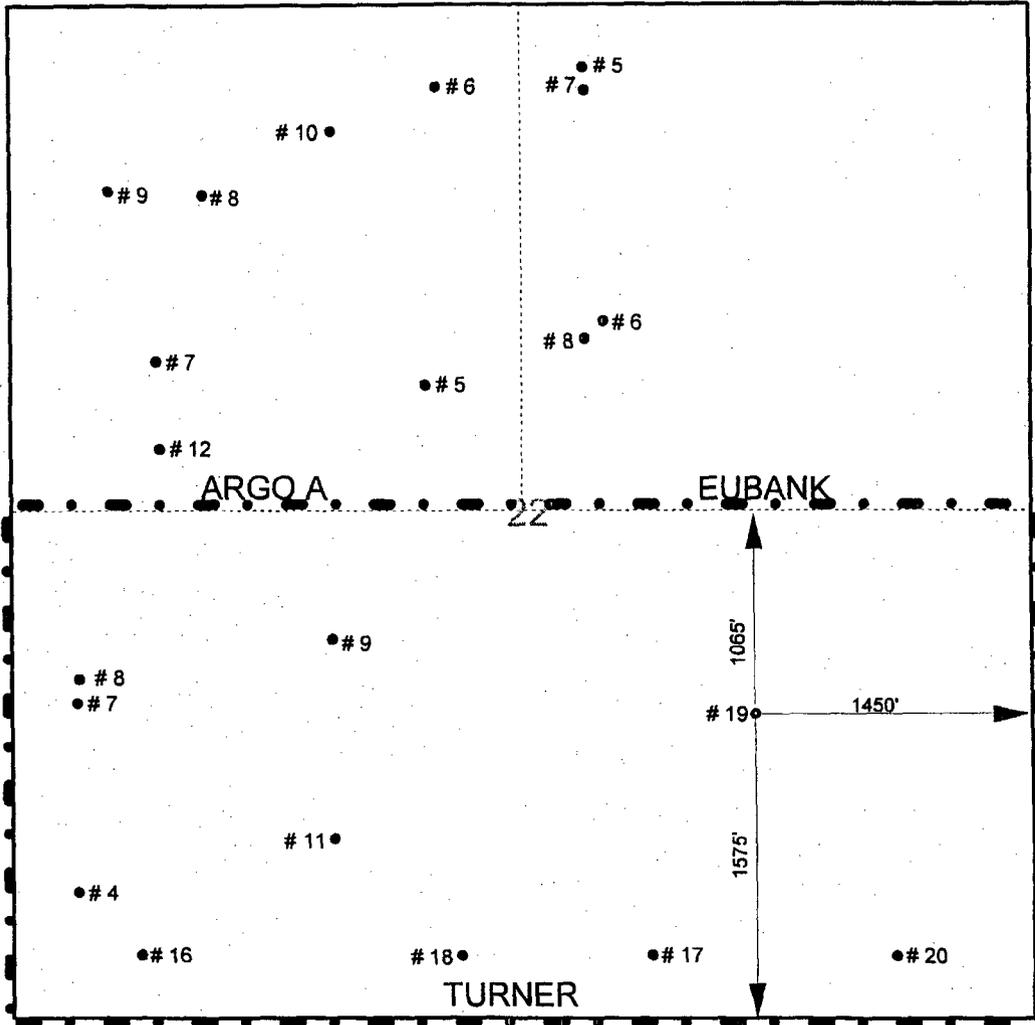
THE TURNER #19  
1575 FEET FROM THE SOUTH LINE AND  
1450 FEET FROM EAST LINE OF  
SECTION 22, TOWNSHIP 21 SOUTH,  
RANGE 37 EAST, N.M.P.M.,  
LEA COUNTY, NEW MEXICO

JOHN WEST SURVEYING COMPANY  
412 N. DAL PASO - HOBBS, NEW MEXICO - 505-393-3117

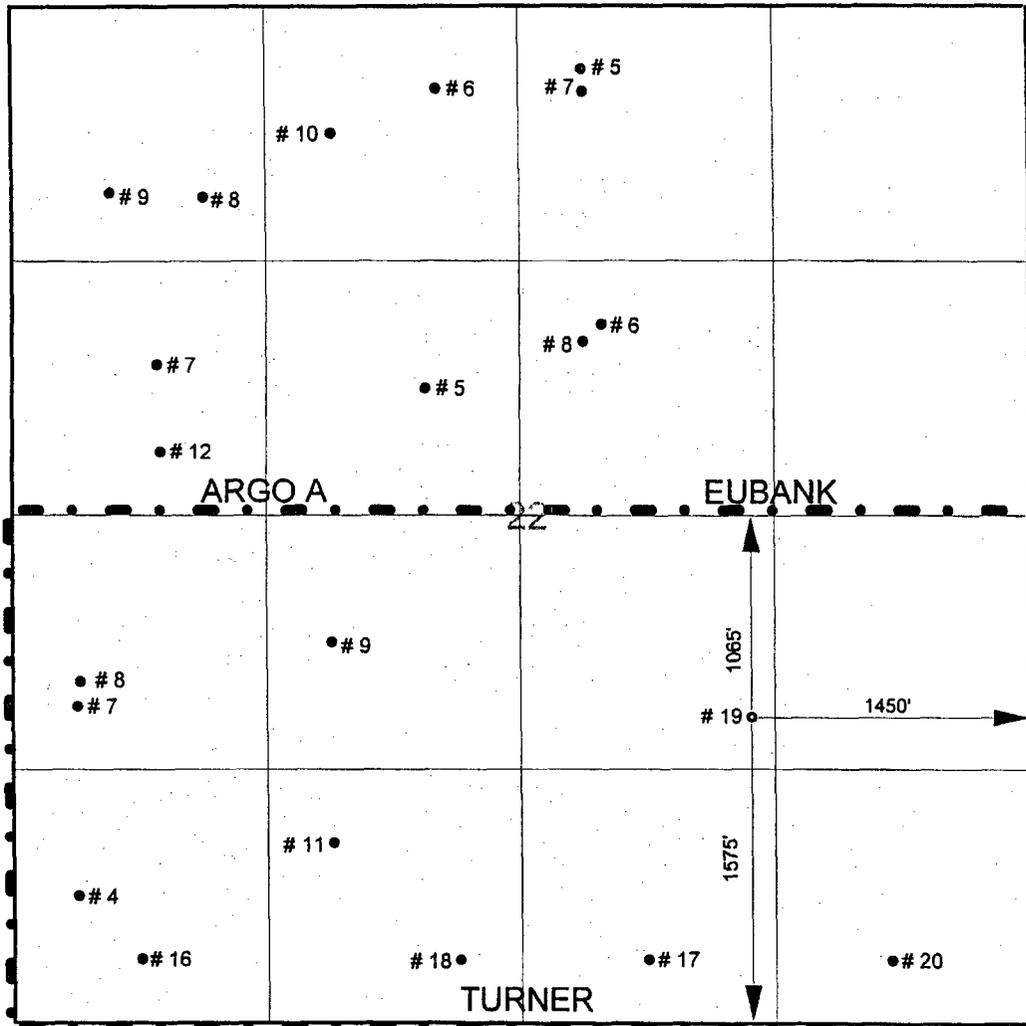
Survey Date: 12/18/01	Sheet 1 of 1 Sheets
W.O. Number: 00-11-1297	Drawn By: L. ANAYA
Date: 01/3/02	



APACHE CORPORATION  
 TURNER NO. 19  
 1575' FSL & 1450' FEL  
 SECTION 22, TOWNSHIP 21S, RANGE 37E  
 LEA COUNTY, NEW MEXICO



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