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| DATE IN 12-12-11 | SUSPENSE | ENGINEER DB | LOGGED IN | TYPE NSL | APP NO. 1134150118 |
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



PTG-W
 Conoco Phillips
 Ruby Fed # 2
 6528

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [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 - Simultaneous Dedication
 NSL NSP SD

0-17-175 325

Check One Only for [B] or [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

[D] Other: Specify _____

[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] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Brain Malorino
 Print or Type Name

Brain Malorino
 Signature

Regulatory Specialist
 Title

12/9/11
 Date

brain.d.malorino@conocoPhillips.com
 e-mail Address

ConocoPhillips Company
3300 N "A" St Bldg 6
Midland, TX 79705
October 14, 2011

David Brooks
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Request for Unorthodox Location

Dear David Brooks:

ConocoPhillips Company respectfully request an unorthodox location exception to drill the Ruby Federal #2. The well is located 180' from the north line of the 40 acre unit letter O, of Section 17, Township 17S, Range 32 E, Lea County, NM. During the onsite inspection with the BLM, this location was found to be the only suitable position due to potential sand dune lizard habitat that would allow us to reach our targeted production zone. ConocoPhillips is 100% lessee and 100% working interest owner of the Ruby federal lease. The granting of this exception will prevent waste and minimize surface disturbance of habitat deemed critical by the BLM.

Sincerely,



Brian Maiorino
Regulatory Specialist
ConocoPhillips Company
432-688-6913

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Wednesday, December 21, 2011 4:06 PM
To: 'brian.d.maiorino@conocophillips.com'
Subject: Emerald Fed. #12 and Ruby Federal ##1, 2 and 6 NSL applications

Dear Mr. Maiorino

Each of your letter states that ConocoPhillips is 100% working interest owner of the Emerald or Ruby federal lease, but does not indicate what lands those leases embrace.

What we need to know is if ConocoPhillips is 100% working interest owner of the Yeso rights in the offsetting unit to the proposed location. That would be

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|------------------|--|
| Emerald Fed. #12 | SE/4 NE/4 Unit H 17-17S-32E |
| Ruby Fed. #1 | SE/4 SE/4 Unit P 17-17S-32E |
| Ruby Fed #2 | NW/4 SE/4 (Unit J) and SE/4 SW/4 (Unit K) 17-17S-32E |
| Ruby Fed #6 | NW/4 SW/4 (Unit L) 17-17S-32E and NE/4 SE/4 and SE/4 SE/4 (Units I and P) 18-17S-32E |

Also, I seem to recall from our phone conversation that there were two Emerald applications, and that I could not find one initially, but found it while we were speaking. Unfortunately, I can now find only the applications listed above. If there is another, please email me a copy.

Thanks

David K. Brooks
Legal Examiner

Brooks, David K., EMNRD

From: Maiorino, Brian D [Brian.D.Maiorino@conocophillips.com]
Sent: Thursday, December 22, 2011 7:59 AM
To: Brooks, David K., EMNRD
Subject: RE: Emerald Fed. #12 and Ruby Federal ##1, 2 and 6 NSL applications

Yes that is correct, we are the 100% working interest owner of the Yeso rights in offsetting units to the the proposed locations on your email.

There was only one Emerald, the #12. I believe that it was the Ruby #1 and #2 that got stuck together when we talked last. One emerald and the 3 rubies.

Is there anything you need from my end? Please let me know if there are any other questions or if I need to send in any supplements to these applications.

Thank you for your help!

Brian D Maiorino
Regulatory Specialist
ConocoPhillips Company
432.688.6913
brian.d.maiorino@conocophillips.com

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Wednesday, December 21, 2011 5:06 PM
To: Maiorino, Brian D
Subject: [EXTERNAL]Emerald Fed. #12 and Ruby Federal ##1, 2 and 6 NSL applications

Dear Mr. Maiorino

Each of your letter states that ConocoPhillips is 100% working interest owner of the Emerald or Ruby federal lease, but does not indicate what lands those leases embrace.

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32E

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