

DATE IN 10-11-05	SUSPENSE	ENGINEER Stogner	LOGGED IN 10-12-05	TYPE NSL	APP NO. Psemo528535760
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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



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

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.

Deborah Marberry / Deborah Marberry / Regulatory Analyst / 10/6/05
 Print or Type Name / Signature / Title / Date

deborah.marberry@conocoPhillips.com
 e-mail Address

2005 OCT 11 PM 2 10



ConocoPhillips Company
Deborah Marberry
Regulatory Analyst
Mid-America Business Unit
Lower 48
WL3 - 6108
P.O. Box 2197
Houston, TX 77252
Phone: 832-486-2326
Fax: (832) 486-2764

October 6, 2005

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

Re: Application for **Revised** Non-Standard Location
Administrative Order NSL-5221
Basin Fruitland Coal
San Juan 32-8 # 267 API# 30-045-33075
Surface Unit Letter P, Section 14, T32N R8W 925' FSL & 1054' FEL
Bottomhole Unit Letter A, Section 23, T32N R8W 240' FNL & 1200' FEL
San Juan County, New Mexico

Mr. Stogner:

Due to a Bureau of Land Management request that we again reduce the length of the access road to the #267 well as much as possible, we are proposing to drill this well directionally. With directional drilling and accessing the surface location of the #267 well from the existing San Juan 32-8 #266A well pad (plat attached) the BLM's request will be satisfied. Attached is a letter from our surveyor stating the BLM concerns and the C-102. Because we have not previously drilled directionally in this area we want to keep our step out distance at or near 1000'. The proposed step out distance is 1174' and a legal location would require a step out distance of at least 1585'. A horizontal well is not recommended due to the presence of multiple coal seams.

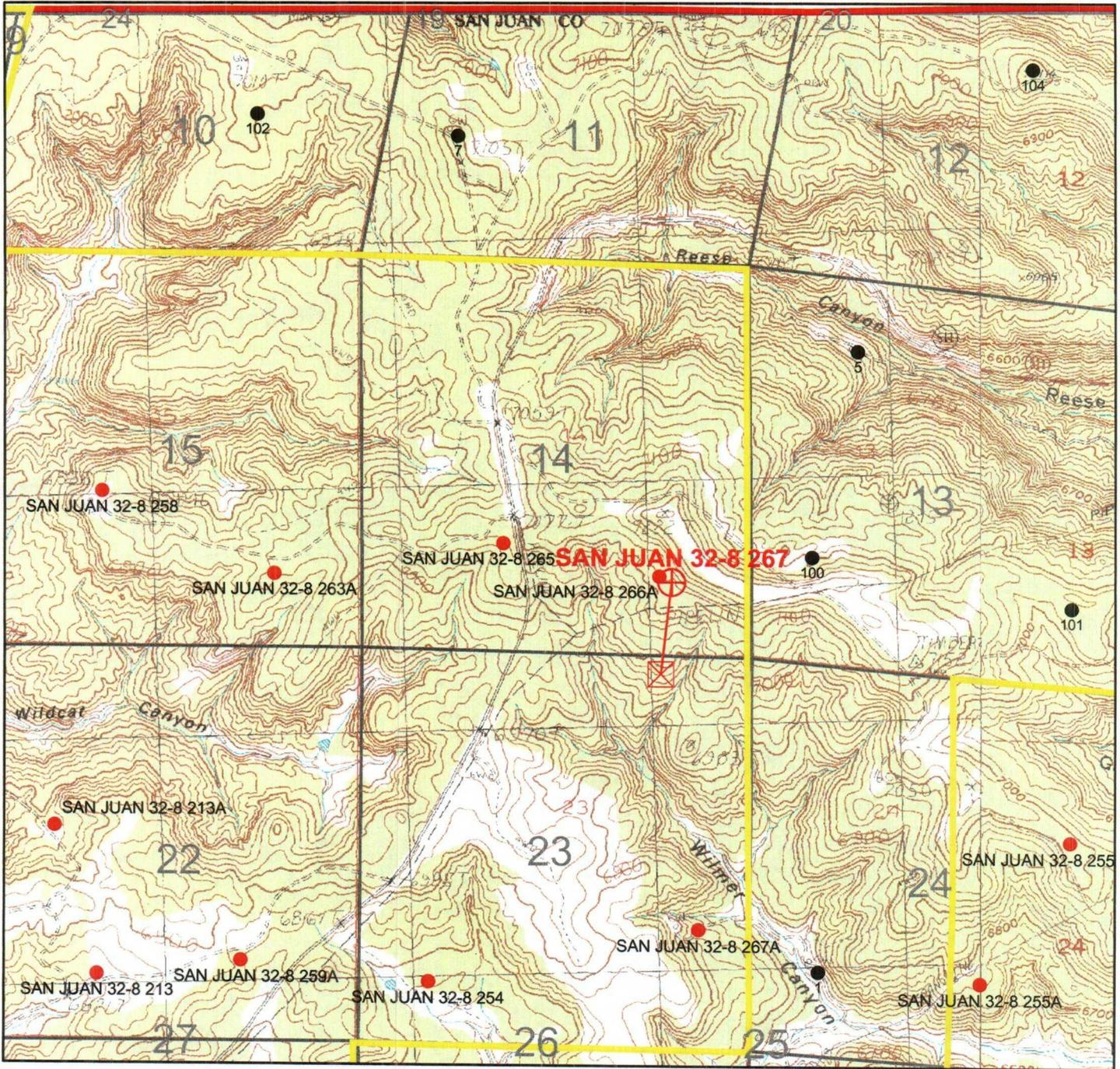
We are our own offset to this well.

ConocoPhillips respectfully requests that a revised non-standard location for the Fruitland Coal well be issued for the reasons cited above. If there are any questions concerning this application, please feel free to call at (832)-486-2326.

Sincerely,

Deborah Marberry
Regulatory Analyst
ConocoPhillips
Attachments

Non Standard Plat for "San Juan 32-8 267"



-  Proposed Surface Location
-  Proposed Bottom Hole Location
-  COP Operated FC Wells
-  Non Operated FC Wells
-  Company Operated Federal Units



ConocoPhillips

San Juan Basin, N. M.

San Juan 32-8 267

Surface: T32N R8W Sec. 14
 925 FSL 1054 FEL
 Bottom: T32N R8W Sec. 23
 240 FNL 1200 FEL

Author: Angela Whitfield	Date: 10-4-05
Compiled by:	Scale: 1"=2000'
MD File: sj_32_8_267_plat.mxd	

CCI

**Chenault Consulting, Inc.
P.O. Box 282
Bloomfield, NM 87413
(505) 599-3456**

**Re: San Juan 32-8 #267
925 FSL 1054 FEL
Section 14, T32N R8W
San Juan Co., NM**

To Whom It May Concern:

The San Juan 32-8 #267 is a proposed Basin Fruitland Coal and is located inside a Federal Unit. This well was staked at 925 feet from the south line and 1054 feet from the east line of Section 14, T32N R8W because of the Bureau of Land Management request that we reduce the length of the access road as much as possible. If anyone has any questions or would like to field review the proposed well location please contact me at 505-599-3456.

Sincerely,

Gordon Chenault

State of New Mexico
 Energy, Minerals & Natural Resources Department
 OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

District I
 1625 N. French Dr., Hobbs, NM 88240
District II
 1301 W. Grand Avenue, Artesia, NM 88210
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
District IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505

Form C-102
 Revised June 10, 2003
 Submit to Appropriate District Office
 State Lease - 4 Copies
 Fee Lease - 3 Copies

AMMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 71629		*Pool Name BASIN FRUITLAND COAL (GAS)	
*Property Code 31330	*Property Name SAN JUAN 32-8 UNIT			*Well Number 267	
*GRID No. 217817	*Operator Name CONOCOPHILLIPS COMPANY			*Elevation 7115	

¹⁰Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
P	14	32N	08W		925'	SOUTH	1054'	EAST	SAN JUAN

¹¹Bottom 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
A	23	32N	08W		240	NORTH	1200	EAST	SAN JUAN

*Dedicated Acres E/2 320.0	*Joint or Infill	*Consolidation Code	*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

17 OPERATOR CERTIFICATION
 I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.
Vicki Westby
 Signature
 Vicki Westby
 Printed Name
 Staff Agent
 Title and E-mail Address
 10/5/05
 Date

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 belief.
 Date of Survey: 10-05-04
 Signature and Seal of Professional Surveyor:

 Certificate Number: ME-0350