

DATE IN 10.28.05	SUSPENSE NA	ENGINEER Stogner	LOGGED IN 10.28.05	TYPE NSL	APP NO. PSEM0530152/32
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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 _____

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 CONSERVATION

- [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 10/27/05
 Print or Type Name Signature Title Date

deborah.marberry@concedphillips.com
 e-mail Address



ConocoPhillips Company

Deborah Marberry
Regulatory Analyst
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P.O. Box 2197
Houston, TX 77252
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Fax: (832) 486-2764
Deborah.marberry@conocophillips.com

October 27, 2005

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

Re: Application for Non-Standard Location - Basin Dakota Pool
San Juan 29-6 Unit #88M (MV/DK)
1,740' FNL & 2,630' FWL
Unit Ltr. F, Section 33-T29N-R6W
Rio Arriba County, New Mexico

30-039-27557

Dear Mr. Stogner,

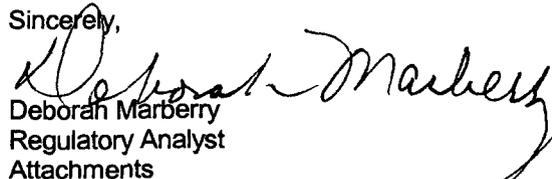
ConocoPhillips plans to drill the referenced well in January of 2006. In an effort to prevent waste and to efficiently develop the 29-6 Unit, this location was selected to serve two purposes: it will serve to accommodate both a W/2 160-acre Dakota infill and an 80-acre Mesaverde infill withdrawal point. An attempt was made to find a location that would be standard for both Mesaverde and Dakota in this narrow, W/2 GPU. Topographic considerations precluded the identification of any viable surface locations which were 660' from the west boundary of the W/2 (non-DK PA) GPU. Please see the attached letter from Jason C. Edwards, NCE Surveying, Inc., stating: 'The primary reason for the non-standard staking of this proposed project is the presence of significant archeological sites in the "legal drilling window". Furthermore, the extreme topographic relief within the prescribed area does not provide a suitable location for drilling a new Dakota well without crowding the existing San Juan 29-6 Unit #56A Mesaverde well located in the NE/4 of the NW/4 of Section 33, T29N, R6W'.

The ability to access both horizons in a single wellbore will reduce development cost and surface disturbance. Since the Mesaverde PA is fully expanded in the 29-6 Unit, this location is standard for the Blanco Mesaverde Pool. The requested location is preferred over other potential NW/4, non-standard Dakota locations in that it provides maximum distance from existing offset Mesaverde and Dakota wells in Section 33.

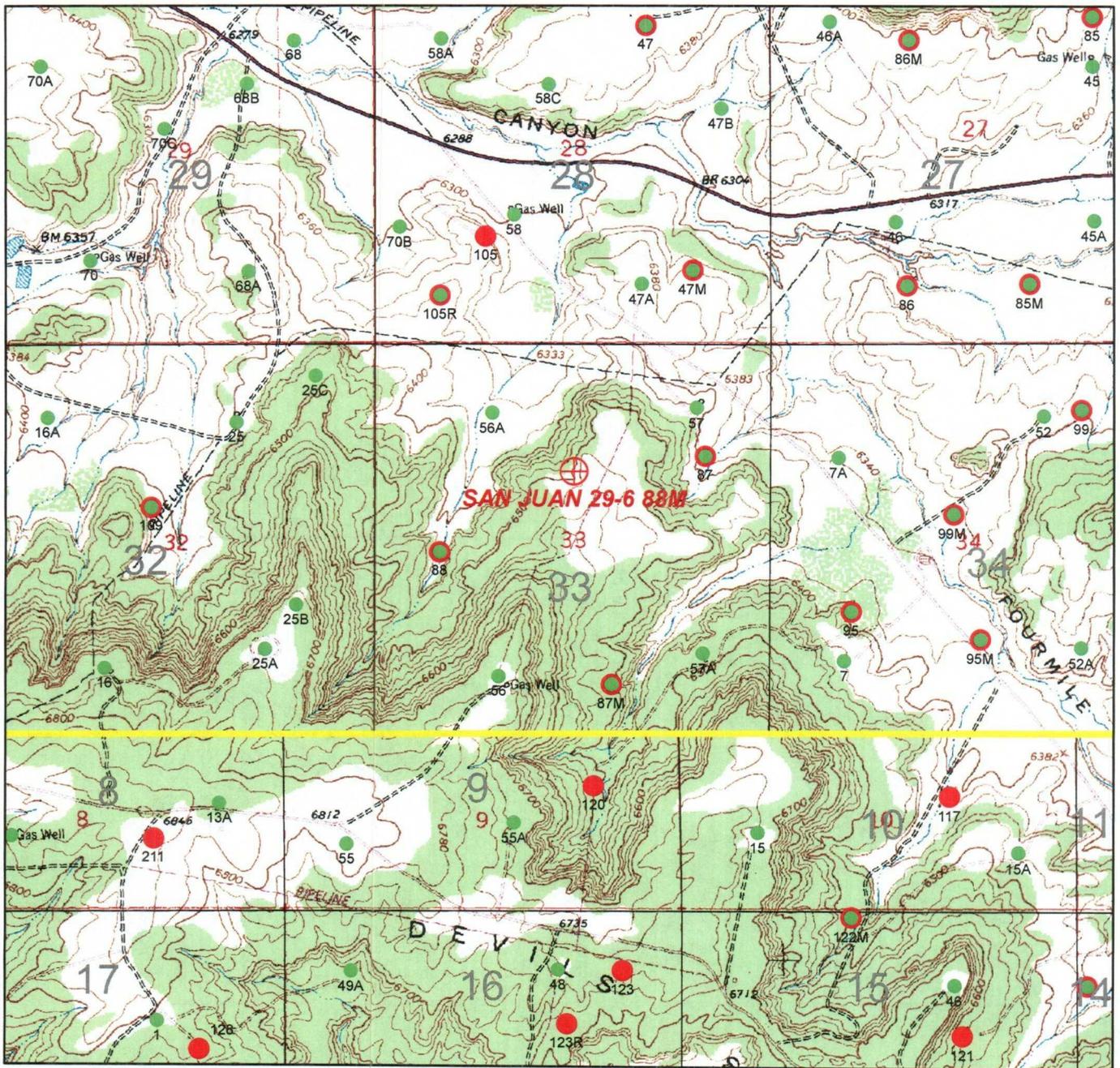
The requested #88M location encroaches on the east offset Dakota GPU, which is in the Dakota PA and operated by ConocoPhillips. Based on offset Dakota well performance, we have firm expectations that Dakota performance in the subject #88M should merit the inclusion of the W/2 GPU in the 29-6 Unit Dakota PA. An application to downhole commingle production from the Blanco Mesaverde and Basin Dakota pools will be filed once the APD has been approved.

ConocoPhillips respectfully requests that a non-standard location for the Basin Dakota Pool be issued for the referenced well for the reasons cited above. If there are any technical questions concerning this application, please feel free to call Dan Hensley at (832) 486-2385 or myself at (832) 486-2326.

Sincerely,


Deborah Marberry
Regulatory Analyst
Attachments

Section 33-T29N-R6W



Basin Dakota NSL Application

Sec. 33 W/2 GPU is non-DK PA

The proposed location is standard MV.



-  Proposed Location
-  Mesa Verde Well Locations
-  Dakota Well Locations
-  Federal Unit Boundary



San Juan Basin, N. M.

San Juan 29-6 88M

1740 FNL 2630 FWL
T29N R6W Section 33
Rio Arriba County

Author: Angela Whitfield	Date: 10-20-05
Compiled by:	Scale: 1"=2000'
MD File: san_juan_29_6_88m_plat.mxd	

Plat shows MV and DK completions only.

CONOCOPHILLIPS COMPANY SAN JUAN 29-6 UNIT #88M

Currently staked at:

1740' FNL & 2630' FWL, Section 33, T29N, R6W

Reasons for non-standard staking of proposed new drill:

The San Juan 29-6 Unit #88M is a Blanco Mesaverde / Basin Dakota well located within a Federal Unit; however, the proposed well is not located within the Basin Dakota participating area. The primary reason for the non-standard staking of this proposed project is the presence of significant archeological sites in the "legal drilling window". Furthermore, the extreme topographic relief within the prescribed area does not provide a suitable location for drilling a new Dakota well without crowding the existing San Juan 29-6 Unit #56A Mesaverde well located in the NE/4 of the NW/4 of Section 33, T29N, R6W.

Jason C. Edwards
New Mexico LS 15269

District I
PO Box 1980, Hobbs, NM 88241-1980

District II
PO Drawer 00, Artesia, NM 88211-0719

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

District IV
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

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

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-039-2755		Pool Code 72319 \ 71599	Pool Name BLANCO MESAVERDE \ BASIN DAKOTA
Property Code 31326	Property Name SAN JUAN 29-6 UNIT		Well Number 88M
OSRID No. 217817	Operator Name CONOCOPHILLIPS COMPANY		Elevation 6499'

10 Surface Location

U. or Sec. No.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
F	33	29N	6W		1740	NORTH	2630	WEST	RIO ARriba

11 Bottom Hole Location If Different From Surface

U. or Sec. No.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
12 Dedicated Acres 320.0 Acres - W/2 (MV) 320.0 Acres - W/P (DK)									

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

LAT: 35°41.0802' N
LONG: 107°29.0677' W
DATUM: NAD83

*
NM-03471-A
ConocoPhillips Company's
San Juan 29-6 Unit #88
30-039-0755
2460' Esc. - 850' Full

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 R. Westby
Printed Name
Sr. Analyst

17A
Date
December 3, 2003

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.

Survey Date: SEPTEMBER 12, 2003

Signature and Seal of Professional Surveyor

JASON C. EDWARDS
Certificate Number 15269

Standard 640-acre Section