

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.

| | | | |
|--------------------|-----------|----------------|------|
| Print or Type Name | Signature | Title | Date |
| | | e-mail Address | |



Plantation Petroleum Companies

Plantation Petroleum Holdings III, LLC; Plantation Operating, LLC

2203 Timberloch Place, Ste. 229
The Woodlands, TX 77380
Tel: (281) 296-7222
Fax: (281) 298-2333

January 16, 2007

SENT VIA DHL

Mark E. Fesmire, P.E., Director
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, NM 87505

**RE: Meyer B-28 A Com A/C-2 No. 5 - Proposed Drilling to Eumont Gas Pool
660' FSL & 660' FEL
Unit A, Sec 33, T-20S, R-37E
Lea County, New Mexico
Administrative Application for Simultaneous Dedication,
Standard Location, in Existing Non-Standard Proration Unit
Administrative Order R-4977, Federal Lease No. LC-NM 2511**

2007 JAN 17 PM 10 40

Dear Mr. Fesmire,

Please find enclosed a copy of the previously approved Administrative Order No. R-4977 to simultaneously dedicate two Eumont wells, to the subject existing 360 acre Eumont (Gas) proration unit, the **Meyer B-28 A Com A/C-2 No. 2 & 3** in the NSP approved March 5, 1975 consisting of SE/4, E/2 of SW/4 Section 28 and N/2 of NE/4 & NE/4 of NW/4 Section 33 T-20S, R-37E Lea County, New Mexico. Subsequently, the **Meyer B-28 A Com A/C-2 No. 3 was plugged and abandoned on 9/13/05** by the previous operator. With only two wells now producing from the NSP (**Meyer B-28 A Com A/C-2 No. 2 & the newly drilled Meyer B-28 A Com A/C-2 No. 4**), we would now like to add an additional well to the existing NSP.

We hereby ask your approval to drill corresponding to the new drilling application for the **Meyer B-28 A Com A/C-2 No. 5**. Approval of the simultaneous dedication application will prevent waste, by allowing for the optimal recovery of remaining gas reserves while protecting our mineral rights, (including gas reserves from tighter Eumont strata, within the Eumont interval). See attached supporting geological and engineering data.

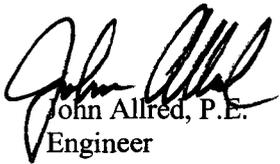
Also, please find enclosed an original C-101 and C-102 corresponding to the new drilling application for the **Meyer B-28 A Com A/C-2 No. 5** along with the C-144 and BOP diagram.

Notice of this administrative application has been sent by DHL to the applicable diagonal and adjacent offset Eumont operators, as well as, the NMOCD in Hobbs, NM.

We thank you for your thoughtful review of this matter as we expect a drilling rig in the next few weeks.

Very truly yours,

PLANTATION OPERATING, LLC


John Alfred, P.E.
Engineer

cc:

Chris Williams
District Supervisor – District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Donna Mull
APD Permitting – District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Zachary Oil Operating Company
307 W. 7th St., Ste 1212
Fort Worth, TX 76102-5178

ConocoPhillips
401 Penbrook
Odessa, TX 79762

XTO Energy Incorporated
200 N. Loraine, Suite 800
Midland, TX 79701

Chevron USA Incorporated
15 Smith Rd.
Midland, TX 79705

Occidental Permian Limited
6 Desta Dr., Suite 6000
Midland, TX 79710

Plantation Operating LLC
Meyers "B-28-A" Com A/C-2 Lease
 E/2 SW/4, SE/4, Section 28
 N/2 NE/4, NE/4 NW/4 Section 33
 T-20-S, R-37-E
 Lea County, New Mexico
 (360 acres)

20S-37E

Aug Pet, etal
 Chevron
 NCT 2
 26 B 160
 2.8MM
MONUMENT UNIT
 T.(OPER)

Hartman-Davidson
 A. B. Reeves
 D. Hartman
 Arco Oil Co.
 Reeves
 (Gulf)
 Evans Oil
 Reeves
 (Gulf)
 Reeves
 29
 "Reeves"
 A. B. Reeves
 Interfirst Bank/Ft. Worth, Tr.
 Millard Deck Est.(s)

Chevron
 "Bell-Ramsay"

D. Hartman
 Burgundy O & G
 (W. A. Hudson)
 "AY"
 B-1463
 B-2366
 Turner St.
 151 (DD)
 152 WI
 32
 Apache bel. SA
 B-1167
 Arrington, St.-PC
 177 TIA
 175 WI
 176 WI
 178 WI
 Gruy Pet.
 Shell-St.

21S-36E

Chevron
 B-230
 HBP
 4
 U.S. M.I.
 Eoff Ener.

Chevron
 3
 46 Mil.
 Bell Ramsey State

Chevron
 B 230
 8
 Bell Ramsey State

Burgundy
 Os. G
 Amer. Expl.
 26946
 2511
 U.S.
 20A
 Conoco, etal
 Eoff Ener.
 Conoco
 Meyer-Fed.

D. Hartman
 2511
 5
 "Meyer-Fed."
 Millard Deck Est.(s)

OXY
 62667
 15
 Gillully-Fed.
 Mewbourne Oil
 to Qn. base
 OXY
 62667
 "Eumont-Fed"
 U.S.
 Interfirst Bk.
 Ft. Worth, Trustee
 Millard Deck Est.(s)

Amer. Expl.
 26946
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 U.S.
 Amer. Expl.
 to 4000'

D. Hartman
 2511
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 "B-27"
 2511
 "Meyer"
 U.S.
 M. Deck Est.(s)

D. Hartman
 2511
 2511
 "B-28-A"
 "Meyer"

D. Hartman
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 "B-27"
 2511
 "Meyer"
 U.S.
 M. Deck Est.(s)

D. Hartman
 2511
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 BP AMER.
 D/R

OXY
 62667
 15
 Gillully-Fed.
 Mewbourne Oil
 to Qn. base
 OXY
 62667
 "Eumont-Fed"
 U.S.
 Interfirst Bk.
 Ft. Worth, Trustee
 Millard Deck Est.(s)

D. Hartman
 1
 D. Hartman
 "B-27"
 2511
 "Meyer"
 U.S.
 M. Deck Est.(s)

Phillips D/R
 HBP etal.
 Amer. Expl.
 to 4200'

Marbob
 H.B.P.
 62667
 Chevron
 Bell Ramsey
 Pan. Amer.)
 (148 to 3900'
 Gillully (w/)
 T88105
 M. Deck Est.(s)
 DIAT-31-69)

D. Hartman
 1
 D. Hartman
 "B-27"
 2511
 "Meyer"
 U.S.
 M. Deck Est.(s)

Phillips D/R
 HBP etal.
 Amer. Expl.
 to 4200'

Morexco
 6
 "Bel Ramsey" State

Conoco
 Phillips
 2511
 Conoco
 Semu
 Fumant
 118

Meyer B-28 A/C-2 # 5
 A-33-20S-37E
 660' FNL & 660' FEL
 Proposed Eumont Gas Well
 Plantation Operating

Zachary Oil Oper.
 (Phillips)
 A.J.
 Crawford Est. M.I.
 Amer. Expl.
 to 3900'

Conoco
 Phillips
 2511
 Conoco
 Semu
 Fumant
 118

Amer. Expl.
 to 4200'

Zachary Oil Oper.
 (Phillips)
 A.J.
 Crawford Est. M.I.
 Amer. Expl.
 to 3900'

Acreage Ownership Plat
T-20-S, R-37-E & T-21-S, R-36-E
 Lea County, New Mexico
 Scale: 1" = 2000'

LIST OF OFFSET EUMONT (GAS) OPERATORS

Plantation Operating, LLC
 Meyer B-28 A Com A/C-2 #5
 Unit A, Section 33, T-20S, R-37E
 Lea County, New Mexico

| Tract No. | Operator | Lease and Well Name (s) | Gas Well Locations | Unit Description | No. of Acres |
|------------------|-------------------------------|--------------------------------|---------------------------|---|---------------------|
| 1 (Orange) | Plantation Operating, LLC | Meyer B 27 #1 | E-27-20S-37E | NW/4 Section 27 T-20-S, R-37-E | 160 |
| 2 (Dark Blue) | Zachary Oil Operating Company | Turland Federal #1 | K-27-20S-37E | SW/4 Section 27 T-20-S, R-37-E | 160 |
| 3 (Light Green) | ConocoPhillips | Meyer B 28 A A/C-1 #1 | G-28-20S-37E | NE/4, E/2 NW/4 Section 28 T-20-S, R-37-E | 240 |
| 4 (Purple) | XTO Energy Incorporated | Bell Ramsey NCT B #3 | L-28-20S-37E | W/2 NW/4, W/2 SW/4 Section 28 T-20-S, R-37-E | 160 |
| 5 (Yellow) | Plantation Operating, LLC | Meyer B 28 A Com A/C #2 | O-28-20S-37E | SE/4, E/2 SW/4 Section 28 T-20-S, R-37-E N/2 NE/4, NE/4 NW/4 Section 33 T-20-S, R-37-E | 360 |
| 6 (Dark Green) | Chevron USA Incorporated | Bell Ramsay NCT C Com #1 | J-34-20S-37E | NW/4, SW/4, SE/4 Section 34 T-20-S, R-37-E | 480 |
| 7 (Light Blue) | Occidental Permian Limited | Gillully B Federal RA A #22 | F-33-20S-37E | SE/4, W/2 SW/4, S/2 NE/4, SE/4 NW/4 Section 33 T-20-S, R-37-E | 360 |
| 8 (Red) | Chevron USA Incorporated | Bell Ramsay NCT B #2 | M-33-20S-37E | W/2 NW/4, W/2 SW/4 Section 33 T-20-S, R-37-E | 160 |
| 9 (Yellow) | Plantation Operating, LLC | Meyer B-28 A Com A/C-2 #4 | I-28-20S-37E | SE/4, E/2 SW/4 Section 28 T-20-S, R-37-E N/2 NE/4, NE/4 NW/4 Section 33 T-20-S, R-37-E | 360 |

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

State of New Mexico
Energy Minerals and Natural Resources

Form C-101
May 27, 2004

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit to appropriate District Office

AMENDED REPORT

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

| | | |
|---|---|--------------------------------------|
| ¹ Operator Name and Address Plantation Operating, LLC 2203 Timberloch Place, Suite 229, The Woodlands, Texas 77380 | | ² OGRID Number 237788 |
| | | ³ API Number 30 - 025- |
| ⁴ Property Code 302118 | ⁵ Property Name Meyer B-28 A Com A/C-2 | ⁶ Well No. 5 |
| ⁹ Proposed Pool 1 Eumont (Yates-7Rivers-Queen) | | ¹⁰ Proposed Pool 2 |

⁷ Surface Location

| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| A | 33 | 20S | 37E | | 660' | South | 660' | East | Lea |

⁸ Proposed 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 |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| | | | | | | | | | |

Additional Well Information

| | | | | |
|--|---------------------------------------|---|--|--|
| ¹¹ Work Type Code N | ¹² Well Type Code G | ¹³ Cable/Rotary R | ¹⁴ Lease Type Code P | ¹⁵ Ground Level Elevation |
| ¹⁶ Multiple No | ¹⁷ Proposed Depth 3870' | ¹⁸ Formation Yates - 7 Rivers-Queen | ¹⁹ Contractor To Be Determined | ²⁰ Spud Date ASAP |
| Depth to Groundwater 120' | | Distance from nearest fresh water well > 1,000' | | Distance from nearest surface water > 1,000' |
| Pit: Liner: Synthetic <input type="checkbox"/> _____mils thick Clay <input type="checkbox"/> Pit Volume: _____bbls Drilling Method: Drilling | | | | |
| Closed-Loop System <input checked="" type="checkbox"/> Fresh Water <input type="checkbox"/> Brine <input checked="" type="checkbox"/> Diesel/Oil-based <input type="checkbox"/> Gas/Air <input type="checkbox"/> | | | | |

²¹ Proposed Casing and Cement Program

| Hole Size | Casing Size | Casing weight/foot | Setting Depth | Sacks of Cement | Estimated TOC |
|-----------|-------------|--------------------|---------------|-----------------|---------------|
| 9-7/8" | 7" | 20# | 1025' | 350 | Surface |
| 6-1/8" | 4 1/2" | 11.6# | 3870' | 700 | Surface |
| | | | | | |
| | | | | | |

²² Describe the proposed program. If this application is to DEEPEN or PLUG BACK, give the data on the present productive zone and proposed new productive zone. Describe the blowout prevention program, if any. Use additional sheets if necessary.

Before drilling out from surface pipe, the well will be equipped with a 2000-psi 7-1/16-inch Series-900 double-ram hydraulic BOP and Hydril and surface pipe and BOP system will be tested to a minimum pressure of 2000 psig. Cement volumes may be adjusted to insure that the cement behind both the 7" and 4-1/2" casing strings will be circulated in sufficient volumes to the surface.

²³ I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify that the drilling pit will be constructed according to NMOCD guidelines , a general permit , or an (attached) alternative OCD-approved plan .

OIL CONSERVATION DIVISION

Approved by:

Printed name: Kimberly Faldyn

Title:

Title: Production Tech

Approval Date:

Expiration Date:

E-mail Address: kfaldyn@plantationpetro.com

Date: 1/16/2007

Phone: 281-296-7222

Conditions of Approval Attached

State of New Mexico

Energy, Minerals and Natural Resources Department

Form G-103

Revised October 13, 2006

Submit to Appropriate District Office

State Lease - 4 Copies

Fee Lease - 3 Copies

OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe, New Mexico 87505

DISTRICT I

1625 N. FRENCH DR., ROBBERS, NM 86240

DISTRICT II

1361 W. GRAND AVENUE, ARTESIA, NM 88210

DISTRICT III

7000 R&O Highway Rd., Artesia, NM 87410

DISTRICT IV

1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

| | | |
|-------------------------|--|----------------------------------|
| API Number | Pool Code 76480 | Pool Name Eumont (Y-7R-Q) Gas |
| Property Code 302118 | Property Name MEYERS B-28 A/C-2 | Well Number 5 |
| OGRID No. 237788 | Operator Name PLANTATION OPERATING, LLC | Elevation 3507' |

Surface Location

| Ul. or lot No. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|----------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| A | 33 | 20-S | 37-E | | 660 | NORTH | 660 | EAST | LLA |

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 360 | Joint or Infill Y | Consolidation Code | Order No. Administrative Order No. R-4977 (3/5/75) |
|------------------------|----------------------|--------------------|---|

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>SECTION 28 SECTION 33</p> <p>GEODETTIC COORDINATES NAD 27 NME</p> <p>F Y=559983.7 N G X=834024.6 E</p> <p>LAT. = 32.534833° N LONG. = 103.249505° W</p> | <p>OPERATOR CERTIFICATION</p> <p>I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the Division.</p> <p><i>John Allred</i> 1/16/07 Signature Date John Allred Printed Name</p> |
| | <p>SURVEYOR CERTIFICATION</p> <p>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.</p> <p>DECEMBER 11, 2006 Date Surveyed REV. 01/09/07 CR Signature & Seal of Professional Surveyor <i>Gary Eidsen</i> 1/9/07 06.11.1947 Certificate No. GARY EIDSON 12641 CRAD HARCROW 17777</p> |

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

State of New Mexico
Energy Minerals and Natural Resources

Form C-144
June 1, 2004

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes No

Type of action: Registration of a pit or below-grade tank Closure of a pit or below-grade tank

Operator: Plantation Operating, LLC Telephone: 281-296-7222 e-mail address: kfaldyn@plantationpetro.com
Address: 2203 Timberloch Place, Suite 229, The Woodlands, Texas 77380
Facility or well name: Meyer B-28 A Com A/C-2 #5 API #: 30-025- U/L or Qtr/Qtr NE/4 SE/4 Sec 33 T 20S R 37E
County: Lea Latitude 32.534833° N Longitude 103.249505° W NAD: 1927 1983
Surface Owner: Federal State Private Indian

| Pit | Below-grade tank | |
|--|--|--|
| Type: Drilling <input type="checkbox"/> Production <input type="checkbox"/> Disposal <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input type="checkbox"/> Liner type: Synthetic <input type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume _____ bbl | Volume: _____ bbl Type of fluid: _____ Construction material: _____ Double-walled, with leak detection? Yes <input type="checkbox"/> If not, explain why not. _____ | |
| Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.) <u>120'</u> | Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more | (20 points) (10 points) <u>0</u> (0 points) |
| Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.) | Yes No <u>No</u> | (20 points) (0 points) <u>0</u> |
| Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.) | Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more | (20 points) (10 points) <u>0</u> (0 points) |
| | Ranking Score (Total Points) | <u>0</u> |

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite offsite If offsite, name of facility _____ (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No Yes If yes, show depth below ground surface _____ ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:
Closed Loop System.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines , a general permit , or an (attached) alternative OCD-approved plan .

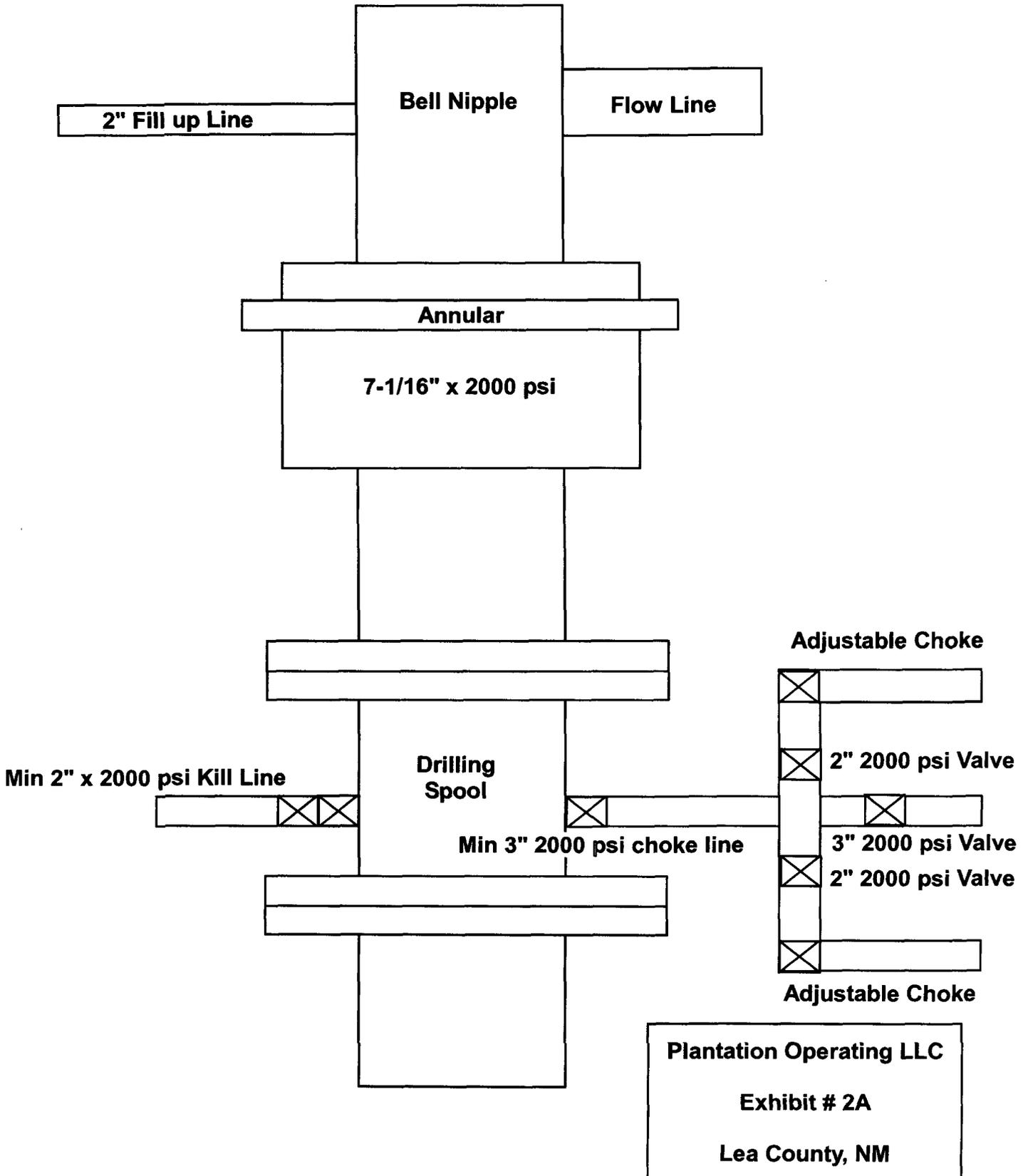
Date: 1/16/2007
Printed Name/Title Kimberly Faldyn / Production Tech Signature Kimberly Faldyn

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title _____ Signature _____ Date: _____

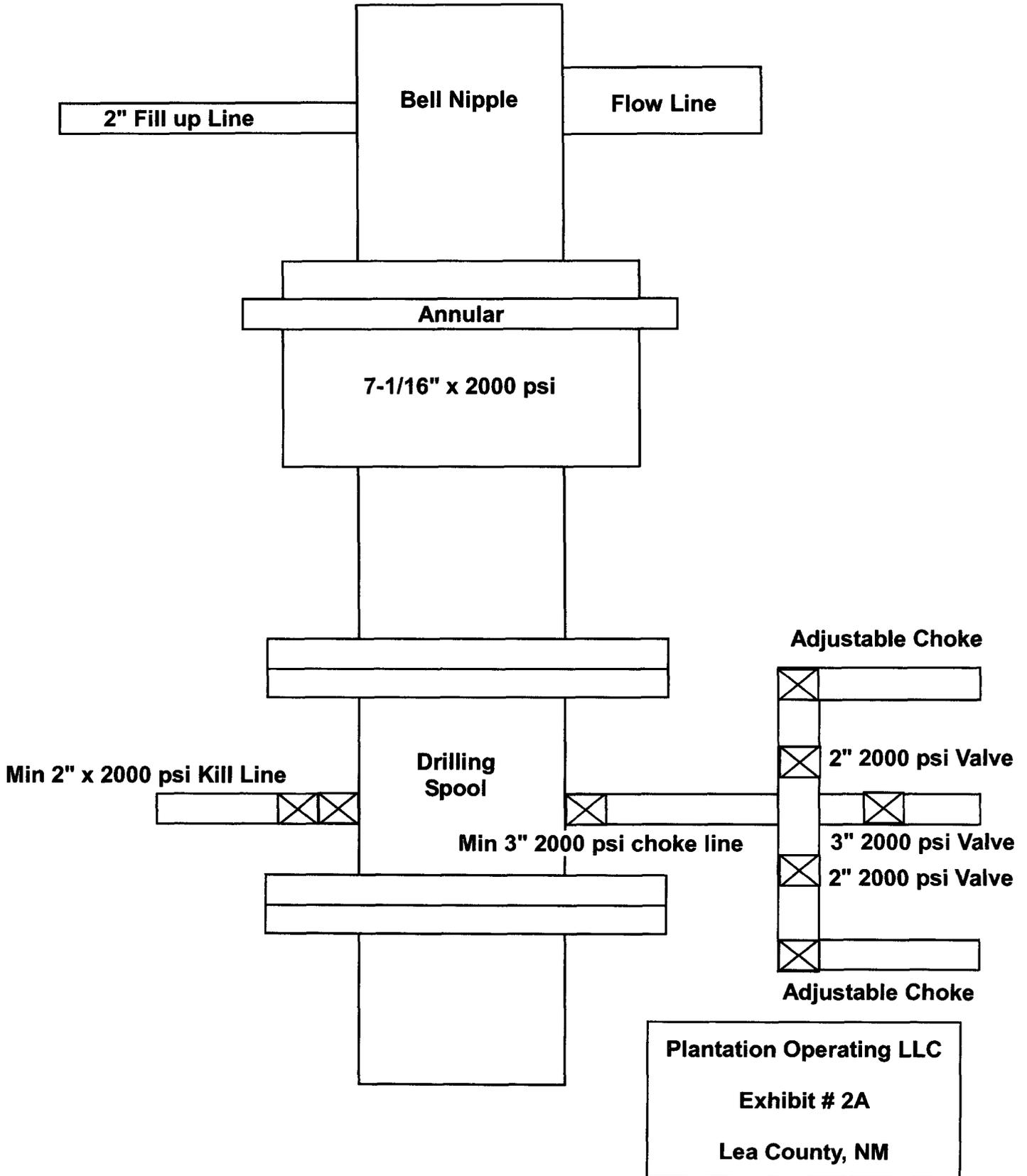
Plantation Operating, LLC

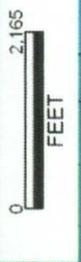
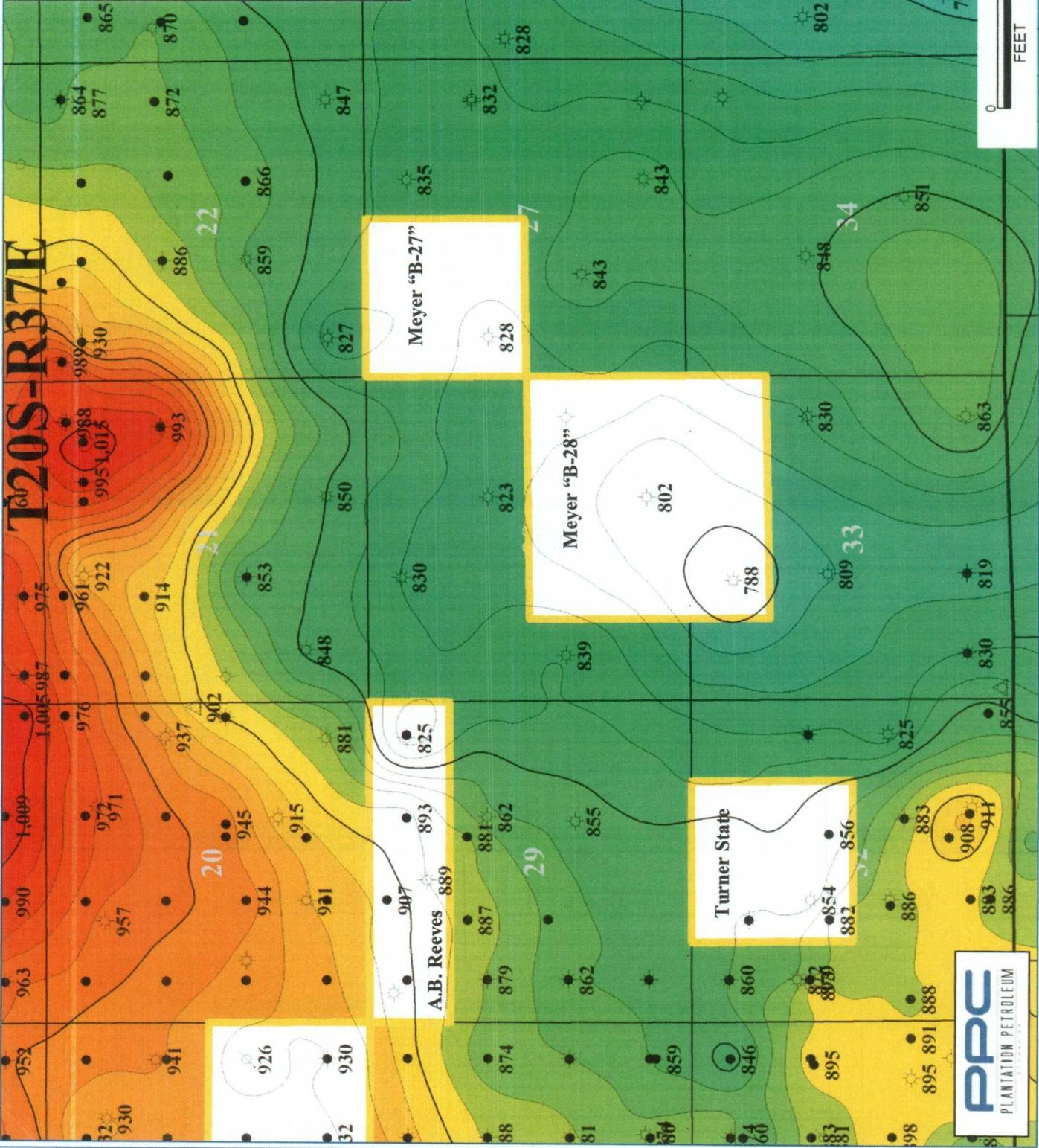
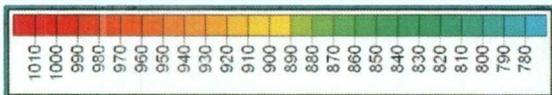
BOP Schematic for 9-7/8" Hole



Plantation Operating, LLC

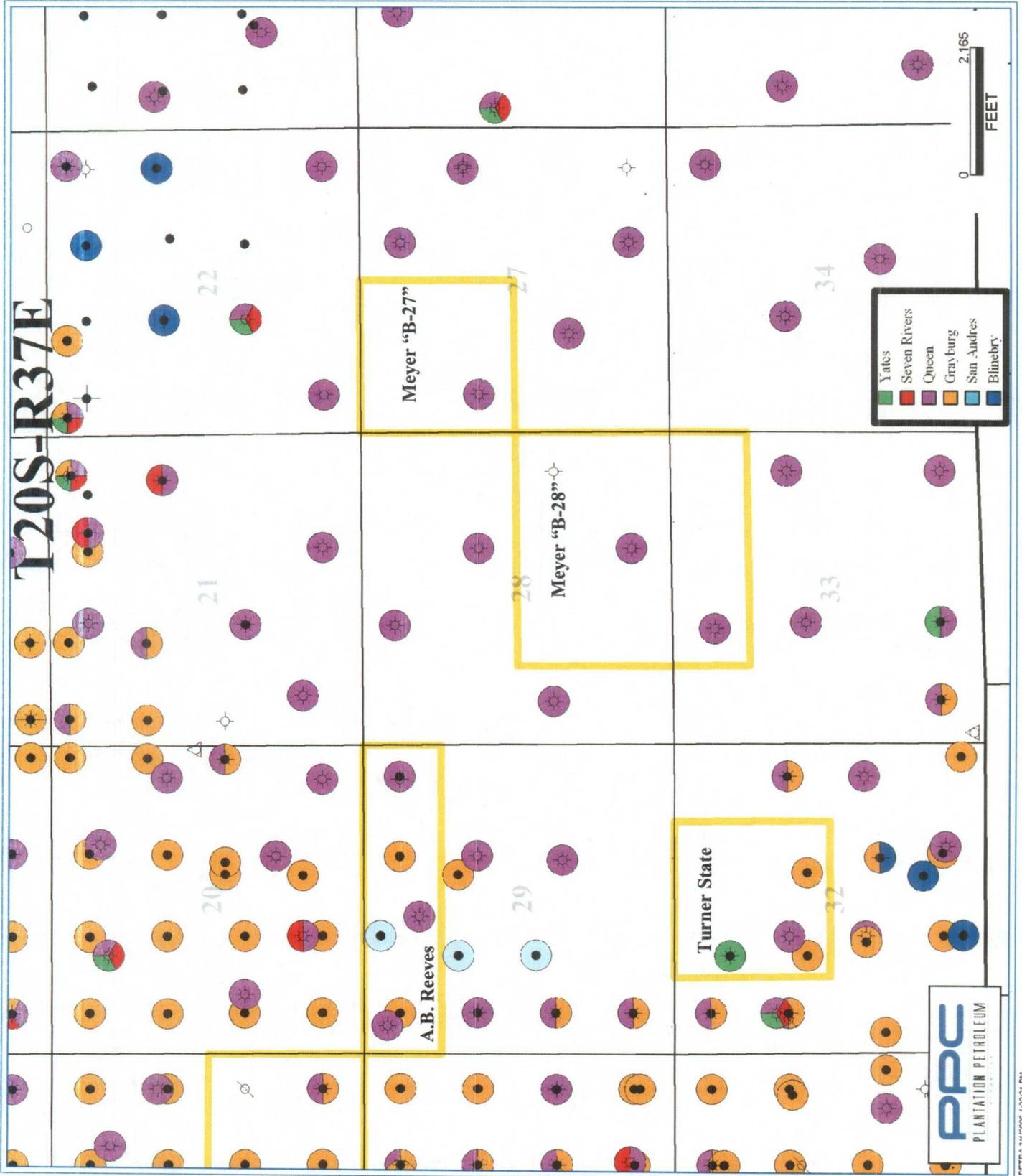
BOP Schematic for 6-1/8 or 7-7/8" Hole





PPC
PLANTATION PETROLEUM
CORPORATION

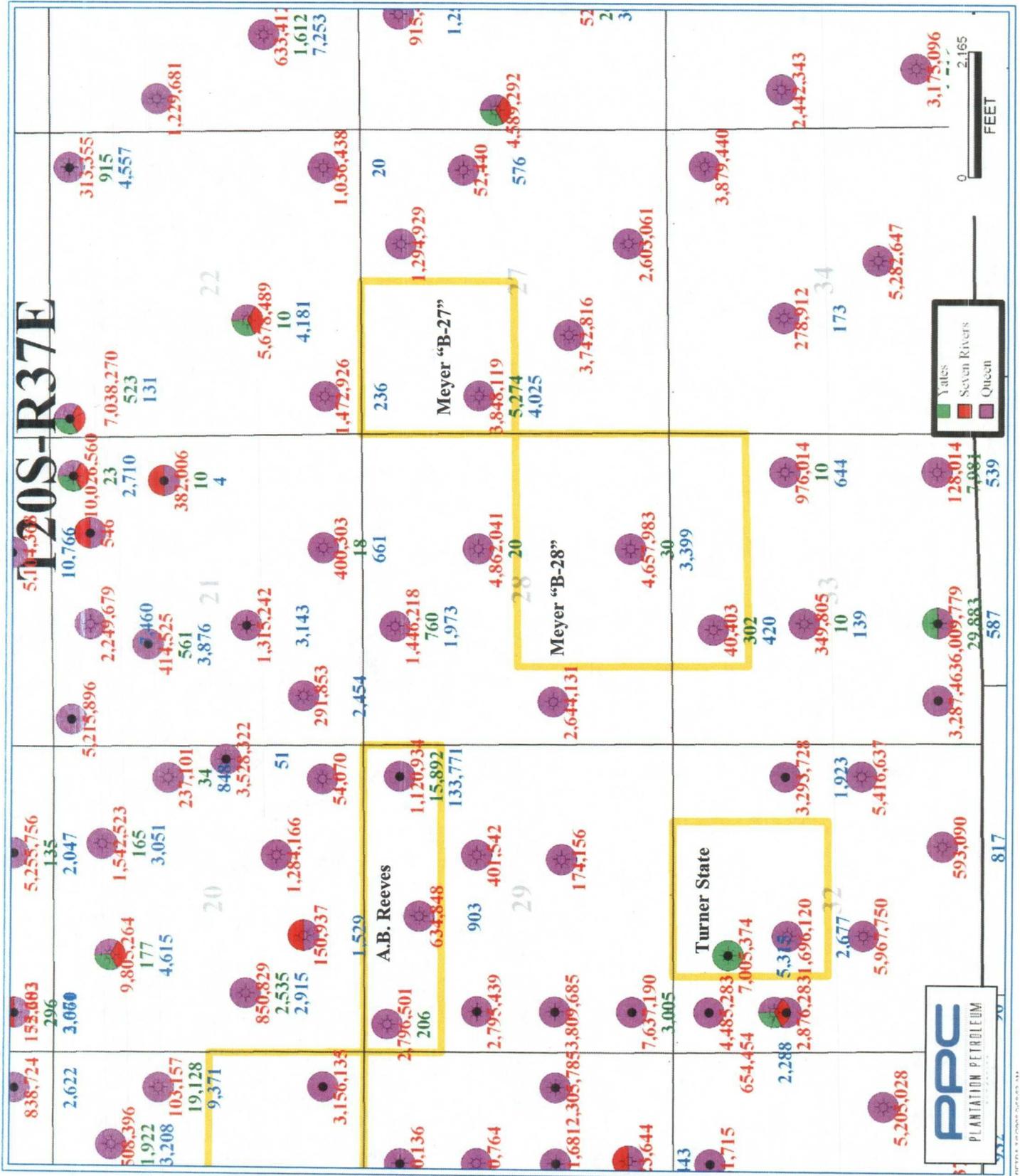
T20S-R37E



| | |
|------------|--------------|
| Green | Yates |
| Red | Seven Rivers |
| Purple | Queen |
| Orange | Grayburg |
| Light Blue | San Andres |
| Dark Blue | Blinberry |

PPC
PLANTATION PETROLEUM
CORPORATION

120S-R37E



Legend:

- Yates (Green circle)
- Seven Rivers (Red circle)
- Queen (Purple circle)



817

587

29,883

128,014

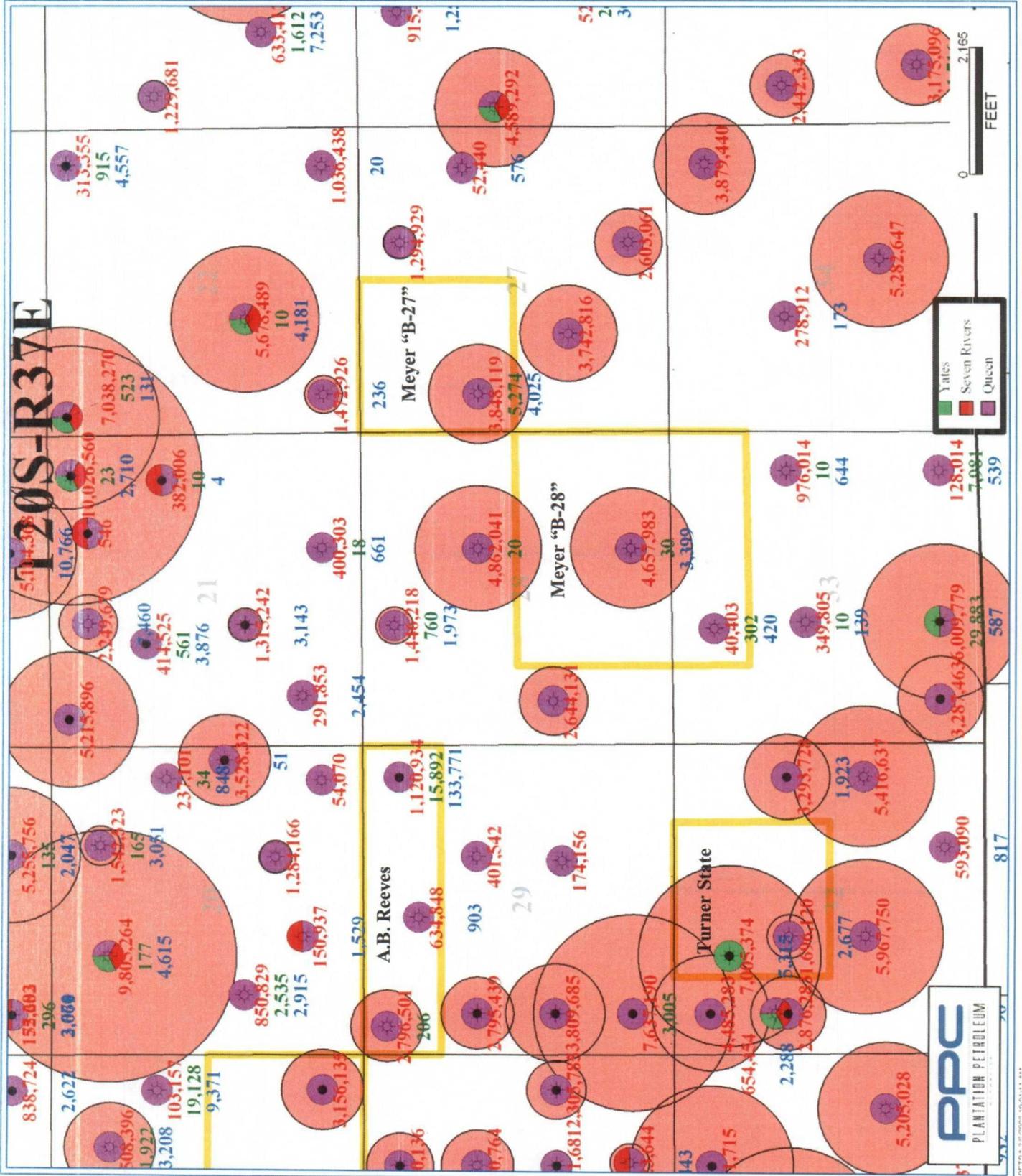
7,981

539

3,175,096

2,165

120S-R37E



PPC
PLANTATION PETROLEUM

Yates
Seven Rivers
Queen

FEET

817

2,166

0

0

0

0

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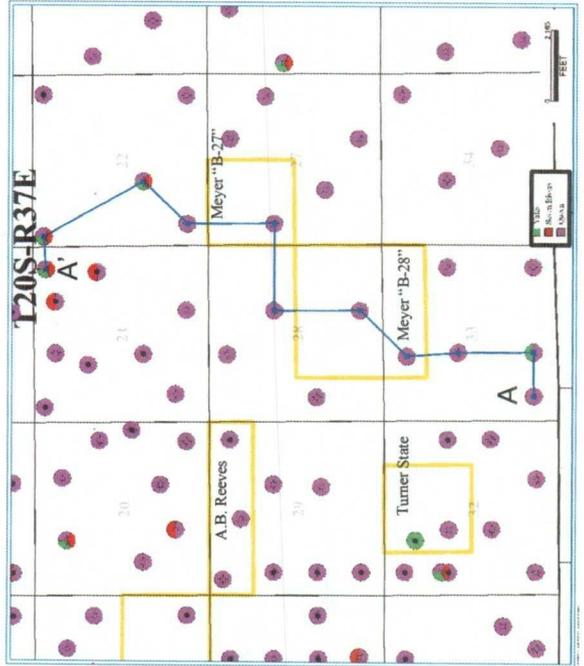
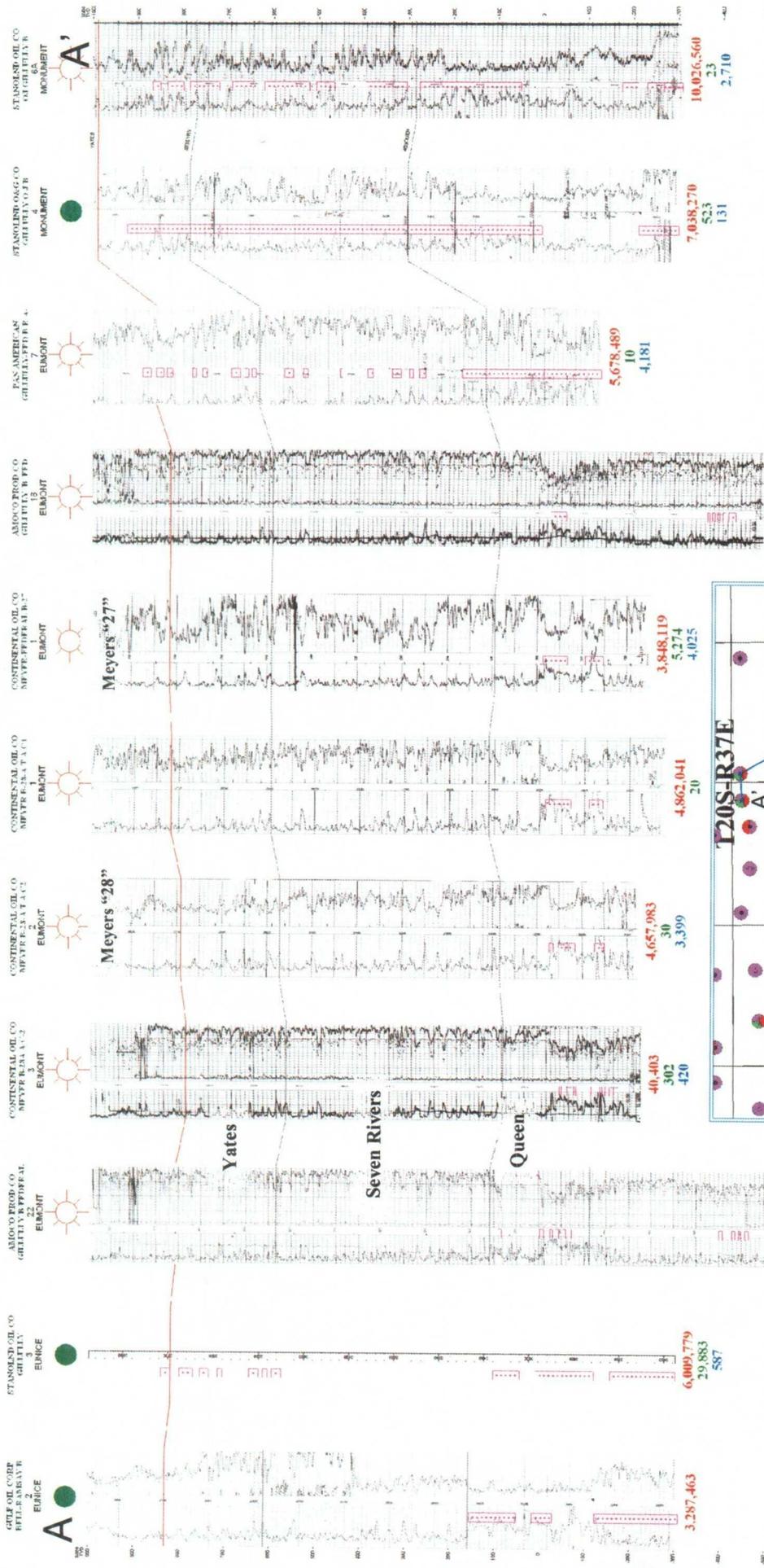
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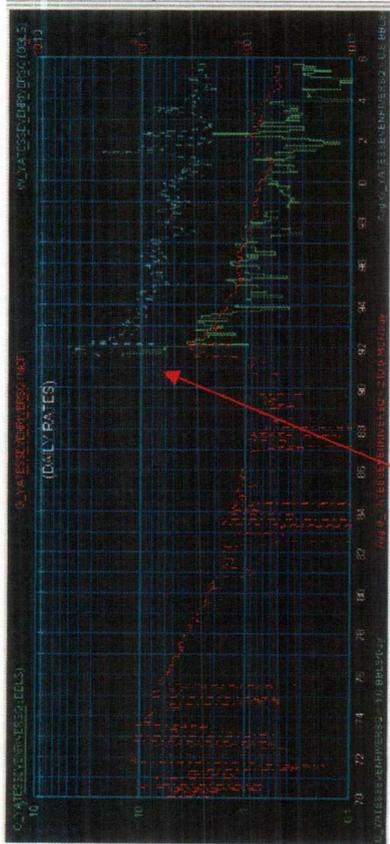
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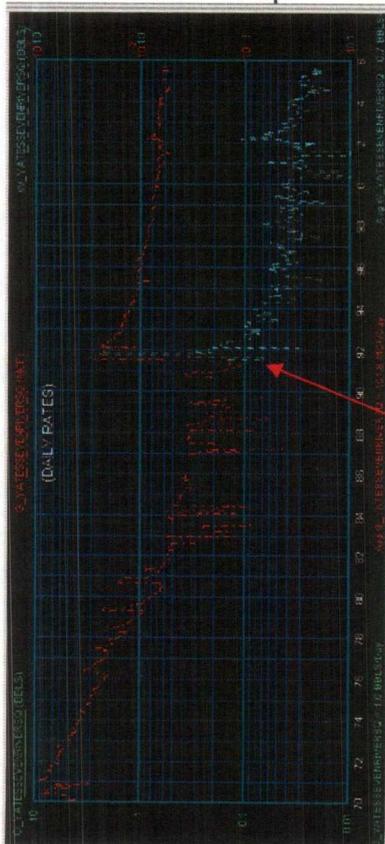


Continental Meyer B-27 #1

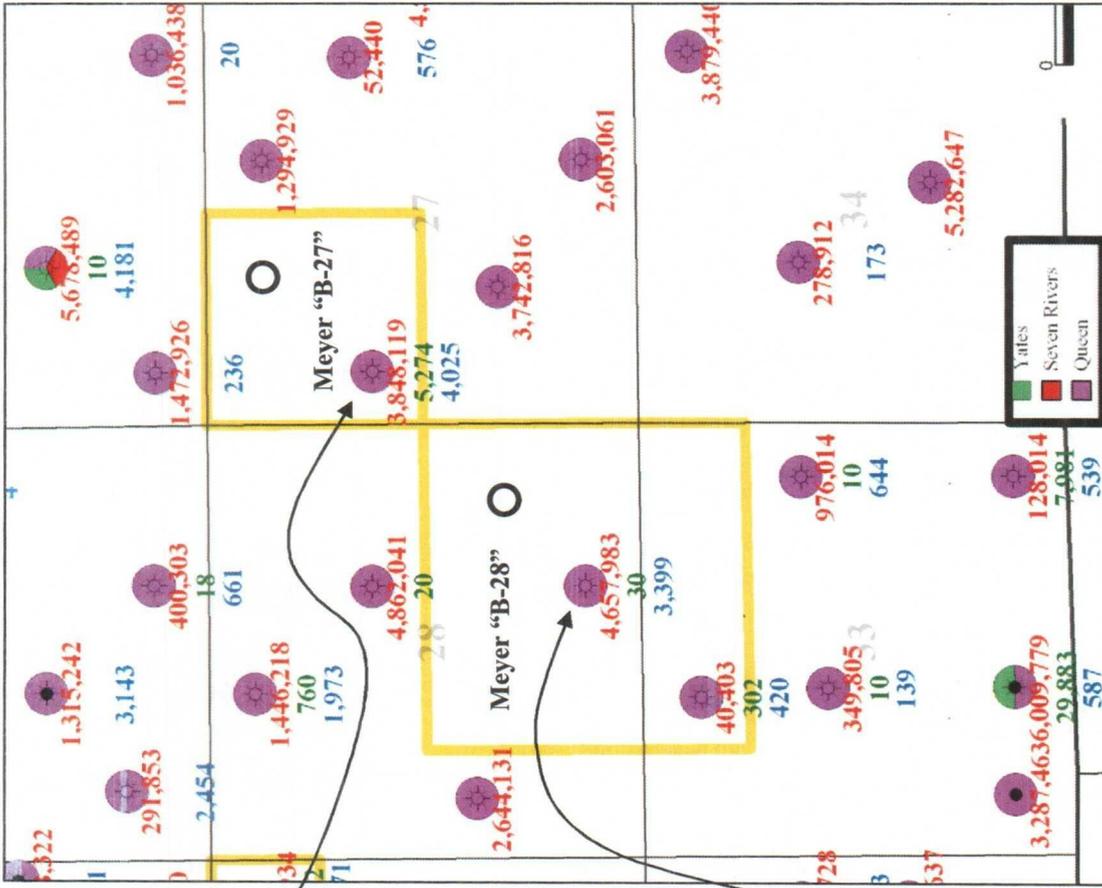


Hartman fracture stimulated and acidized the Queen in this well in 1991. Since then the well has cumulative production of 601,532 mcf.

Continental Meyer B-28 #2



Hartman fracture stimulated and acidized the Queen in this well in 1991. Since then the well has cumulative production of 500,845 mcf.



Meyer "27" 660 FNL & 1980 FWL

Meyer "28" 1980 FSL & 660 FEL

500,845 mcf



Richard L. Stamets
R.L.S.

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION OF NEW MEXICO FOR
THE PURPOSE OF CONSIDERING:

CASE NO. 5414
Order No. R-4977

APPLICATION OF CONTINENTAL OIL
COMPANY FOR AN UNORTHODOX GAS
WELL LOCATION AND SIMULTANEOUS
DEDICATION, LEA COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on March 5, 1975, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this 11th day of March, 1975, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Continental Oil Company, seeks the approval for a non-standard 360-acre gas proration unit comprising the SE/4 and E/2 SW/4 of Section 28, and the N/2 NE/4 and NE/4 NW/4 of Section 33, both in Township 20 South, Range 37 East, NMPM, Eumont Gas Pool, Lea County, New Mexico.
- (3) That the applicant seeks to simultaneously dedicate to said non-standard unit its Meyer B-28 A Com Acct. 2 Wells Nos. 2 and 3 located, respectively, at unorthodox locations, in Unit O of said Section 28 and in Unit C of said Section 33, with unit production to be taken from said wells in any proportion.
- (4) That the proposed non-standard gas proration unit can be efficiently and economically drained and developed by the subject wells.
- (5) That approval of the subject application will afford the applicant the opportunity to produce its just and equitable share of the gas in the Eumont Gas Pool and will otherwise prevent waste and protect correlative rights.

-2-
Case No. 5414
Order No. R-4977

IT IS THEREFORE ORDERED:

(1) That effective at 7:00 a.m. April 1, 1975, the applicant, Continental Oil Company, is hereby authorized to simultaneously dedicate a non-standard 360-acre gas proration unit comprising the SE/4 and E/2 SW/4 of Section 28, and the N/2 NE/4 and NE/4 NW/4 of Section 33, both in Township 20 South, Range 37 East, NMPM, Eumont Gas Pool, Lea County, New Mexico, to its Meyer B-28 A Com Acct. 2 Wells Nos. 2 and 3 located, respectively, at unorthodox locations in Unit O of said Section 28 and in Unit C of said Section 33, with unit production to be taken from said wells in any proportion.

(2) That the allowable assigned to the above-described gas proration unit shall be based upon the unit size of 360 acres and that the operator may produce the allowable assigned to the unit from the subject wells in any proportion.

(3) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year herein-above designated.

STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION

I. R. TRUJILLO, Chairman



PHIL R. LUCERO, Member



A. L. PORTER, Jr., Member & Secretary

S E A L

jr/



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

February 6, 2007

Plantation Petroleum Companies
2203 Timberloch Place, Suite 229
The Woodlands, Texas 77380

Attention: Mr. John Allred

Re: Simultaneous Dedication
Meyer B-28 A Com A/C-2 Well No. 5
Section 33, T-20S, R-37E, NMPM
Eumont Gas Pool
Lea County, New Mexico

Dear Mr. Allred:

I have reviewed your application dated January 16, 2007 to simultaneously dedicate an existing 360-acre gas spacing and proration unit in the Eumont Gas Pool to the Meyer B-28 A Com A/C-2 Wells No. 2, 4 and 5. Please be advised that your application does not contain sufficient data to demonstrate that the proposed Meyer B-28 A Com A/C-2 Well No. 5 is necessary in order:

- a) to effectively and efficiently drain a 160-acre quarter section that cannot be adequately drained by the existing well or wells; or
- b) to adequately protect the subject unit from offsetting drainage; or
- c) to recover additional reserves that would otherwise not be recovered from the reservoir.

As you are aware, Rule (4) of Order No. R-8170-P requires that in order to drill more than one well per 160 acres, the applicant must submit the evidence described above. Although your application contains some geologic and engineering data, this data did not clearly demonstrate that the drilling of the subject well is necessary.

Please submit additional information to add to, or clarify, the data previously submitted, at which time your application will be revisited.

Plantation Petroleum Companies

Request for Infill Well

February 6, 2007

Page 2

Sincerely,



David Catanach
Engineer/Examiner

Xc: OCD-Hobbs

Catanach, David, EMNRD

From: John Allred [jallred@plantationpetro.com]
Sent: Tuesday, February 20, 2007 3:21 PM
To: Catanach, David, EMNRD
Cc: 'Don Dotson'
Subject: RE: Meyer B-28 A Com A/C-2 No. 2

200634

David:

RE: Meyer B-28 A Com A/C-2 No. 2

I am glad to see the information was helpful, below are the answers to your questions:

- 1.) Meyer B-28 A Com A/C 2 # 4 – C-105 shows: 300 MCFD, 0 BOPD, 2 BWPD @ 0.5 psi
- 2.) Meyer B-28 A Com A/C 2 # 2 – No drainage calculation, EUR = 5.003 BCF

We look forward to your approval as we currently have a drilling rig in the field that needs another location this weekend 2/24/07.

Regards,

John Allred

-----Original Message-----

From: Catanach, David, EMNRD [mailto:david.catanach@state.nm.us]
Sent: Tuesday, February 20, 2007 3:00 PM
To: jallred@plantationpetro.com
Subject: Meyer B-28 A Com A/C-2 No. 2

John,

I've received your additional engineering and geologic evidence. I understand what you guys are trying to do. I've just got a couple of more questions. Can you tell me what was the initial producing rate in the recently drilled Meyer B-28 A Com A/C-2 Well No. 4? Also, the Meyer B-28 A Com A/C-2 Well No. 2 looks like it is a fairly decent well in the Queen formation. Have you calculated a drainage area for this well? Also, what is the #2 well going to ultimately recover?

Thanks for the help.

David

2/21/2007