



OIL CONSERVATION DIVISION
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OXY USA INC.
Box 50250, Midland, TX 79710

September 3, 1991

New Mexico Oil Conservation Division
P. O. Box 2088, State Land Office Bldg.
Santa Fe, New Mexico 87504

Attention: Mr. William J. Lemay, Director

**Re: Application of OXY USA Inc. for Unorthodox
Location Approval for the West Bravo Dome
Carbon Dioxide Gas Unit, Well No. 22,
West Bravo Dome Carbon Dioxide Gas Area,
Harding County, New Mexico.**

Dear Mr. Lemay:

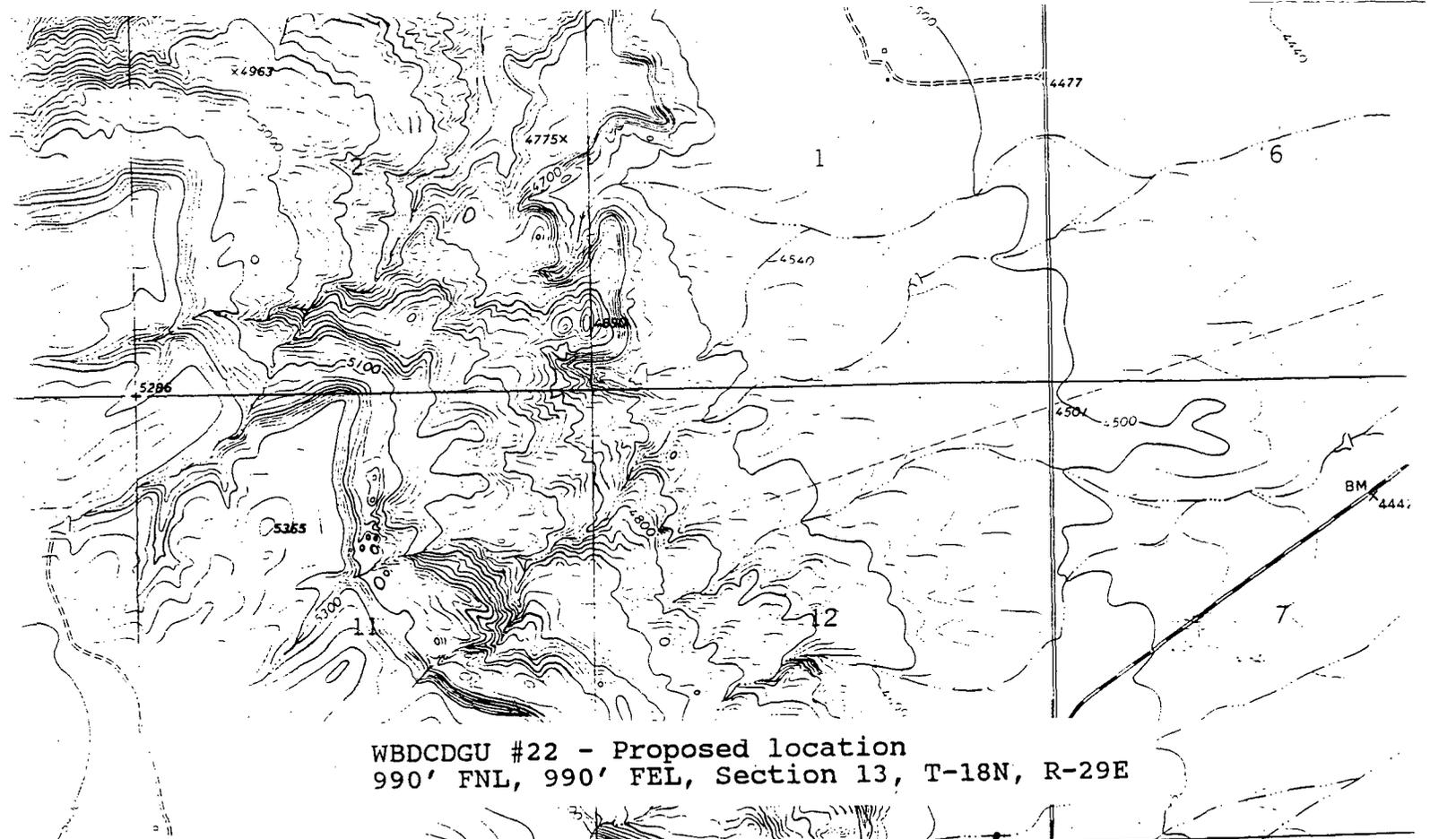
In accordance with Rule 5 of the Special Rules and Regulations for the subject Area, OXY USA Inc. respectfully requests administrative approval of an unorthodox location for the referenced well. The proposed location of Well No. 22 is 990 feet from the north line and 990 feet from the east line of Section 13, Township 18 North, Range 29 East, Harding County, New Mexico. Since this section is spaced on 640 acres, Rule 4 of the Special Rules and Regulations requires that the well be located no nearer than 1650 feet from either the north or east line of Section 13. An exception is required because of the surface topography in the area. Attached is a copy of a topographic map showing the conditions that exist in Section 13 and the proposed location.

Amerada Hess is the only operator of a spacing and proration unit offsetting Section 13. They have been notified, and have waived any objection to the unorthodox nature of this location. Enclosed is a signed waiver demonstrating this fact.

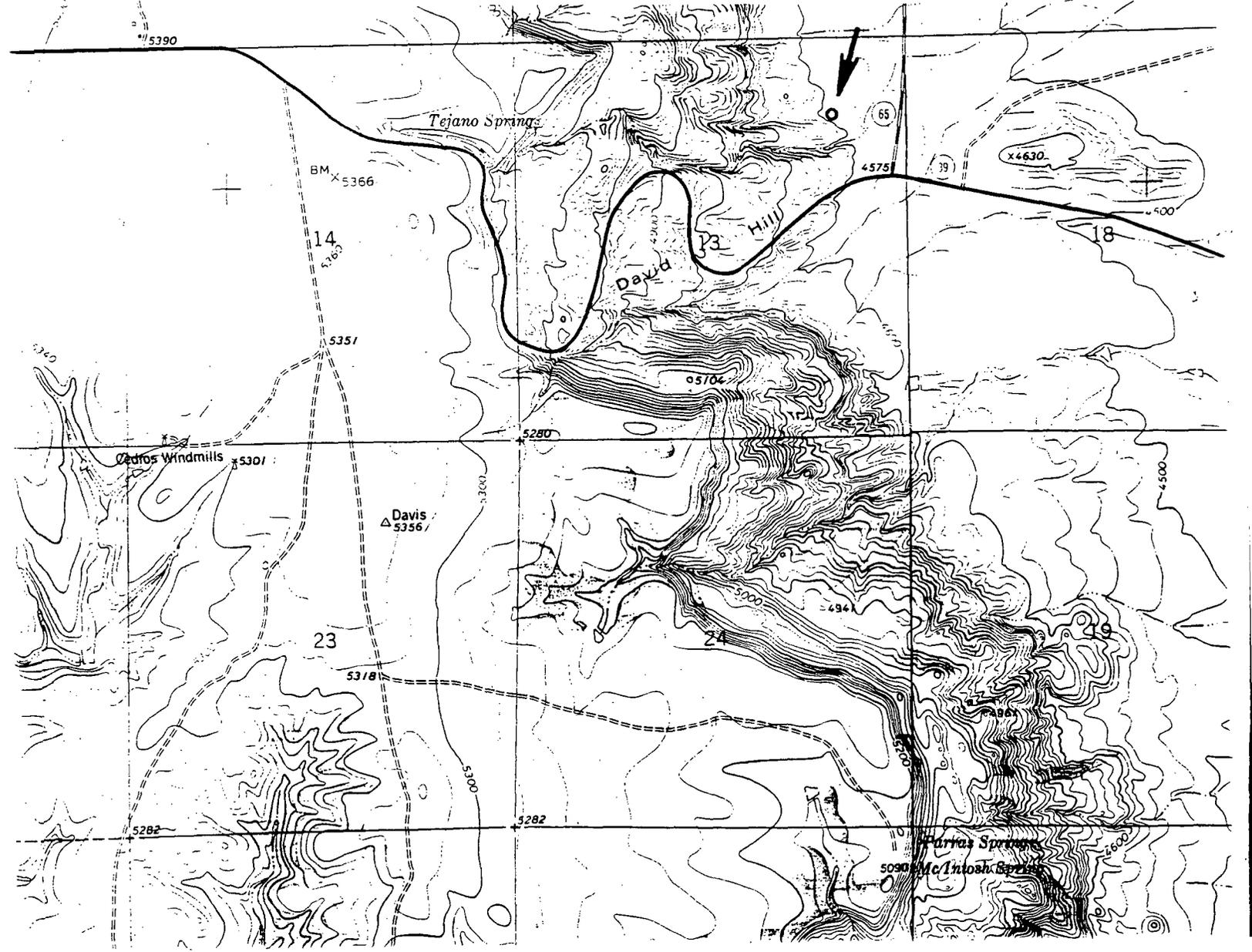
Please let me know if I can provide any more information to assist you in processing this request. Thank you for your consideration.

Sincerely,

Richard E. Foppiano
Regulatory Affairs Advisor - Western Region
REF/ref



WBDCDGU #22 - Proposed location
990' FNL, 990' FEL, Section 13, T-18N, R-29E



WAIVER OF OBJECTION

The undersigned party hereby waives any objection to OXY USA Inc.'s application for an unorthodox gas well location for its West Bravo Dome Carbon Dioxide Gas Unit Well No. 22, Harding County, New Mexico. Said well is to be drilled at a surface location of 990 feet FNL & 990 feet FEL of Section 13, Township 18 North, Range 29 East. This unorthodox location is made necessary because of the topographical conditions in Section 13.

AMERADA HESS CORPORATION

COMPANY

J. C. HEFLEY

Representative



Signature

MANAGER CARBON DIOXIDE SUPPLY

Title

AUGUST 27, 1991

Date Signed