



PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP
Permian Basin Area

September 13, 1991

Unorthodox Well Location Request
~~Burch C Fed Well No. 48~~
Keely C Fed Well No. 62
Eddy County, New Mexico

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Attention: Michael Stogner
Engineer

Gentlemen:

Phillips Petroleum Company respectfully requests administrative approval for unorthodox locations for the subject wells. Rule 104 F(1) provides administrative approval for unorthodox locations when the necessity for such unorthodox location is to permit the completion of an efficient production and injection pattern within a secondary recovery or pressure maintenance project.

The Burch C Fed Well No. 48 is to be located 1310' FSL and 2070' FEL of Section 23, T-17-South, R-29-East, Eddy County, New Mexico.

The Keely C Fed Well No. 62 is to be located 1310' FSL and 160' FEL of Section 24, T-17-South, R-29-East, Eddy County, New Mexico.

The development plan for the Burch Keely calls for infill drilling to place average well spacing on 26 acres, along with converting enough producing wells to water injection to create a staggered line drive injection pattern. The proposed unorthodox locations for the two subject wells were chosen as a means of accomplishing this development pattern as closely as possible. These proposed locations will optimize areal sweep efficiency of the two proposed wells, together with the surrounding production wells.

This project was approved under Order No. R-7900.

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Phillips Petroleum Company is the offset operator of all proration units surrounding the proposed unorthodox locations.

Attached are Forms C-102 for both wells and a plat of the Burch Keely Waterflood area. If there are any questions or if additional information is needed, please contact me at the letterhead address or telephone (915) 368-1488.

Sincerely,



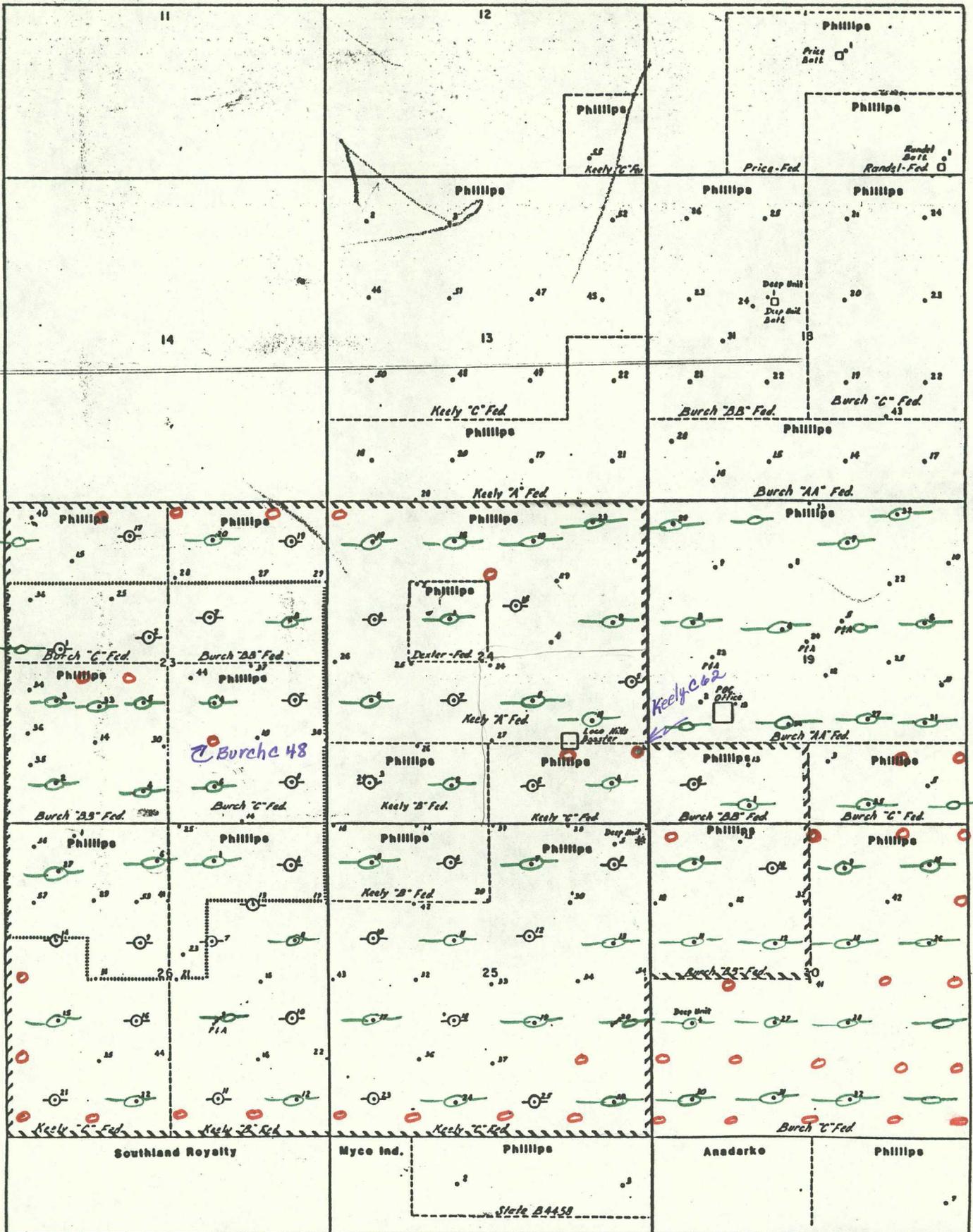
L. M. Sanders, Supervisor
Regulation and Proration

LMS:1sw
regpro/lsand/unorth

Attachments

cc: Oil Conservation Division
Artesia, New Mexico

Bureau of Land Management
Carlsbad, New Mexico



○ INJECTION WELL CONVERSION CANDIDATE
 ○ PRODUCTION WELL DRILLING LOCATION
 Producing well ○ INJECTION WELL DRILLING LOCATION
 Injection well (as of 1/1/87) ○
 Waterflood Project Outline

PHILLIPS PETROLEUM COMPANY
BURCH KEELY WATERFLOOD
 T-17-S, R-29-E & R-30-E
 GRAYBURG JACKSON (8R/G/GB/SA) POOL
 EDDY COUNTY, NEW MEXICO
 2000' 4000'
 SCALE

Submit to Appropriate District Office
 State Lease - 4 copies
 Fee Lease - 3 copies

State of New Mexico
 Energy, Minerals and Natural Resources Department

Form C-102
 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088
 Santa Fe, New Mexico 87504-2088

DISTRICT I
 P.O. Box 1980, Hobbs, NM 88240

DISTRICT II
 P.O. Drawer DD, Artesia, NM 88210

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

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section

Operator Phillips Petroleum Company			Lease Kelly "C"		Well No. 62
Unit Letter P	Section 24	Township 17 South	Range 29 East	County Eddy	

Actual Footage Location of Well:
 1310 feet from the South line and 160 feet from the East line

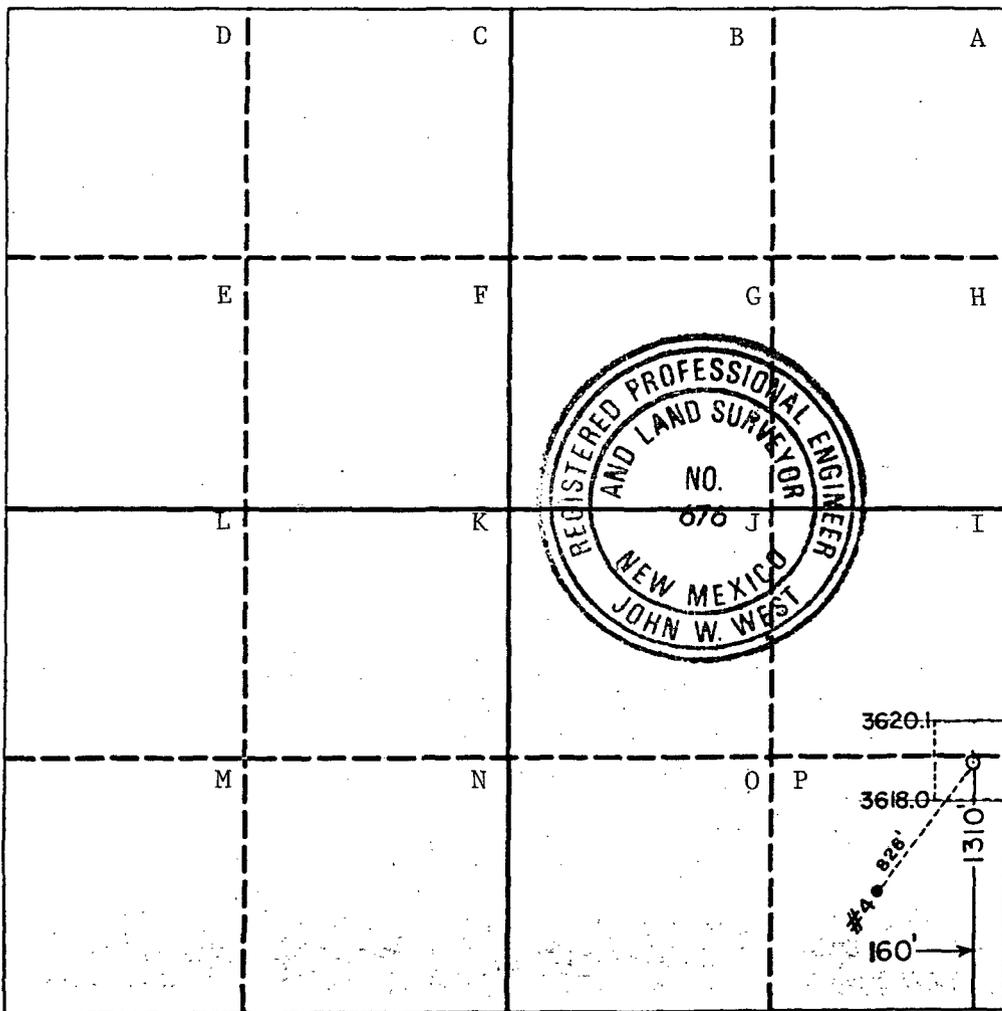
Ground level Elev. 3620.2	Producing Formation Grayburg-Jackson-7R-Q-GB-SA	Pool Grayburg-Jackson-7R-Q-GB-SA	Dedicated Acreage: 40 Acres
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- Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
- If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
- If more than one lease of different ownership is dedicated to the well, have the interest of all owners been consolidated by communitization, unitization, force-pooling, etc.?

Yes No If answer is "yes" type of consolidation _____

If answer is "no" list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interest, has been approved by the Division.



OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Signature
L. M. Sanders

Printed Name
 L. M. Sanders

Position
 Supervisor, Regulation & Proration

Company
 Phillips Pet. Co.

Date
 9/16/91

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 knowledge and belief.

Date Surveyed
 September 4, 1991

Signature & Seal of Professional Surveyor

John W. West

Certificate No. JOHN W. WEST, 676
 RONALD J. EIDSON, 3239

Submit to Appropriate District Office
 State Lease - 4 copies
 Fee Lease - 3 copies

State of New Mexico
 Energy, Minerals and Natural Resources Department

Form C-102
 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088
 Santa Fe, New Mexico 87504-2088

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WELL LOCATION AND ACREAGE DEDICATION PLAT

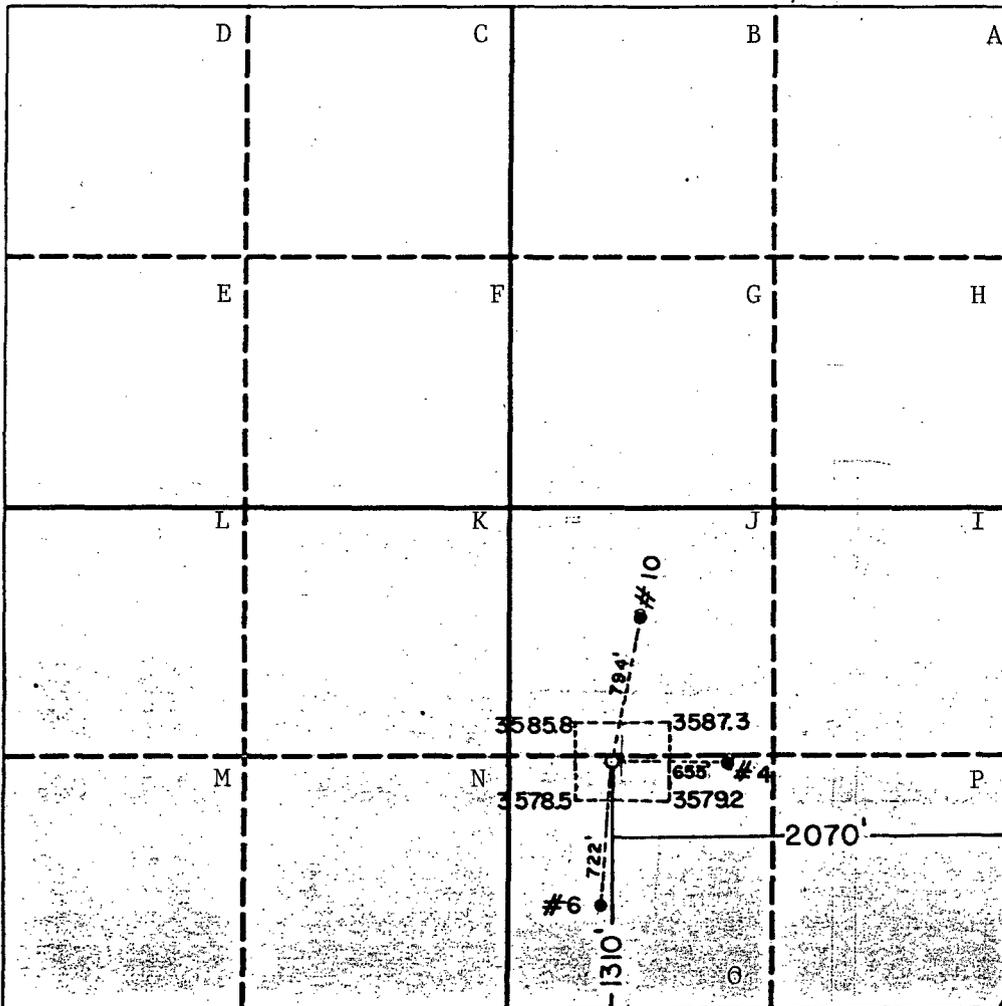
All Distances must be from the outer boundaries of the section

Operator Phillips Petroleum Company			Lease Burch C Federal			Well No. 48		
Unit Letter 0	Section 23	Township 17 South	Range 29 East	County NMPM Eddy				
Actual Footage Location of Well: 2070 feet from the East line and 1310 feet from the South line								
Ground level Elev. 3584.6		Producing Formation Grayburg-Jackson-7R-Q-G-SA			Pool Grayburg-Jackson-7R-Q-G-SA		Dedicated Acreage: 40 Acres	

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 Company
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 September 4, 1991
 Signature & Seal of
 Professional Surveyor

License No. JOHN W. WEST 676
 RONALD J. EDSON, 3239

125630