



marbob
energy corporation

OIL CONSERVATION DIVISION
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September 23, 1993

William LeMay, Director
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Attention: Mr. Mike Stogner

RE: Unorthodox Well Location

Dear Mr. Stogner:

Marbob Energy Corporation respectfully requests an administrative approval without notice and hearing of two unorthodox well locations pursuant to Rule 104, Section F (1) of the New Mexico Oil Conservation Division. The well locations legal descriptions are as follows:

Burch-Keely Unit No. 218

1985 feet from the South line,
1365 feet from the East line
Section 23, Township 17 South,
Range 29 East, Eddy County, New Mexico

Burch-Keely Unit No. 219

660 feet from the South line,
2615 feet from the West line,
Section 24, Township 17 South,
Range 29 East, Eddy County, New Mexico

The wells will be completed in the Grayburg San Andres formation in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool.

Attached to the application are the following Exhibits:

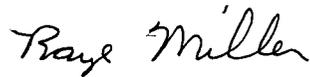
- A. Well location and Acreage Dedication Plat (form C-102) filed with the Carlsbad office of the Bureau of Land Management. (Exhibit A)
- B. A plat showing the proposed unorthodox

location, the respective proration unit, and the offsetting proration units including their ownership. (Exhibit B)

Please note that Marbob Energy Corporation is the operator of all offsetting proration units in the Grayburg San Andres formation of the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool and therefore, no other operators are required to be notified. The geological support for this application is the same as was presented in the case which resulted in Order No. R-7808 which is the offsetting acreage to this unit.

Thank you for your help in this matter. Should you have any further questions or be in need of any additional information, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Raye Miller".

Raye Miller
Land Department

RM/mm
Enclosures

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

Exhibit A
 State of New Mexico
 Energy, Minerals and Natural Resources Department

Form C-102
 Revised 1-1-88

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

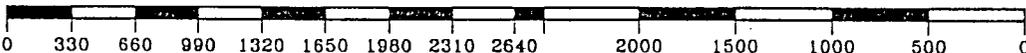
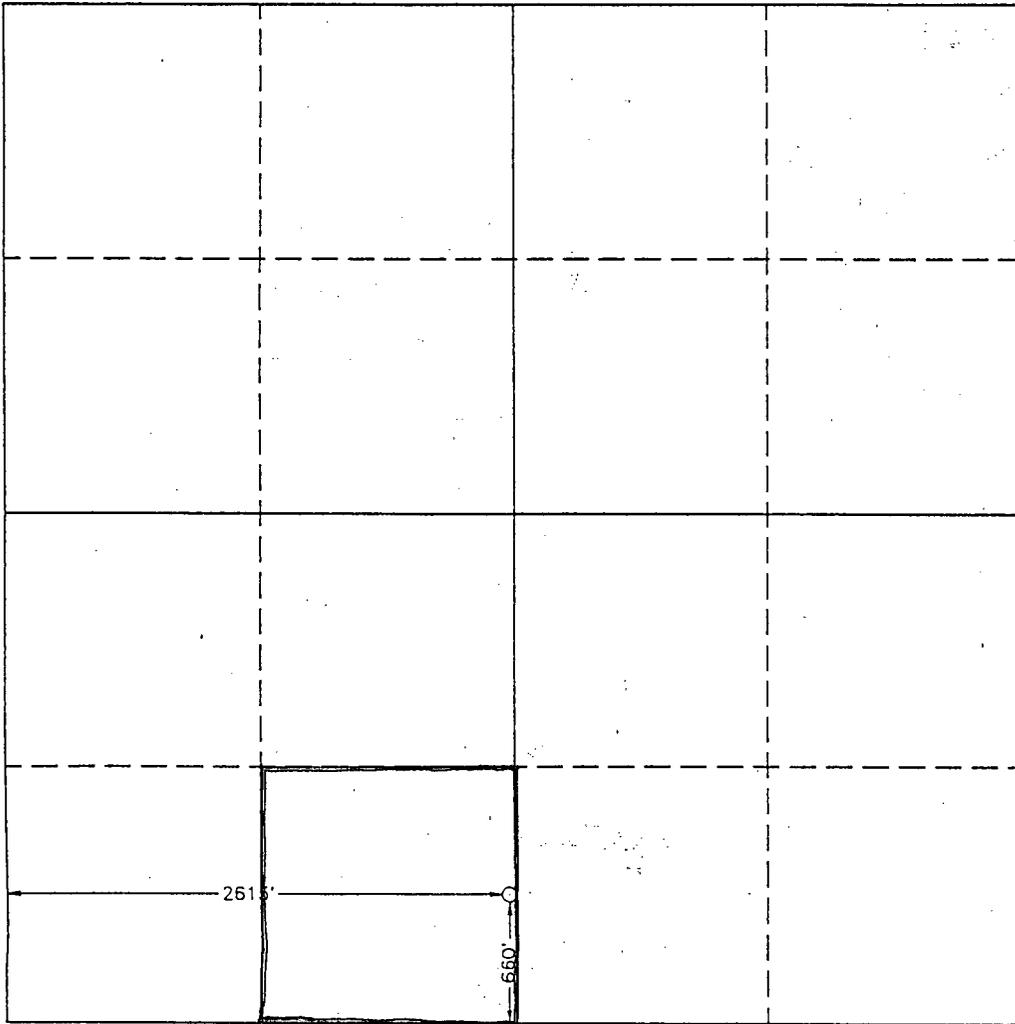
Operator MARBOB ENERGY CORP.		Lease BURCH-KEELY UNIT		Well No. 219
Unit Letter N	Section 24	Township 17 SOUTH	Range 29 EAST NMPM	County EDDY
Actual Footage Location of Well: 660 feet from the SOUTH line and 2615 feet from the WEST line				
Ground Level Elev. 3594.1'	Producing Formation Grayburg San Andres	Pool Grbg Jackson SR Q Grbg SA		Dedicated Acreage: 40 Acres

- 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 of owners and tract descriptions which have actually been consolidated. (Use reverse side of this form necessary.) _____

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



OPERATOR CERTIFICATION

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

Signature
Rhonda Nelson
 Printed Name
 Rhonda Nelson
 Position
 Production Clerk
 Company
 Marbob Energy Corporation
 Date
 September 16, 1993

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 8, 1993

Signature & Seal of Professional Surveyor
 GARY L. JONES
 NEW MEXICO
 7977
 Certificate No. JOHN A. WEST, 676
 EDISON, 3239
 GARY L. JONES, 7977

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MARBOB ENERGY CORPORATION

Burch-Keely Unit #218
 1985' FSL, 1365' FEL
 Section 23, T-17S, R-29E
 Eddy County, New Mexico

Date: 9/93 Exhibit #B

OIL CONSERVATION DIVISION

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 P.O. Box 1980, Hobbs, NM 88240

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

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 P.O. Drawer DD, Artesia, NM 88210

EXHIBIT A

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 1000 Rio Brazos Rd., Aztec, NM 87410

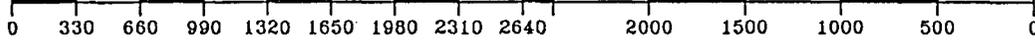
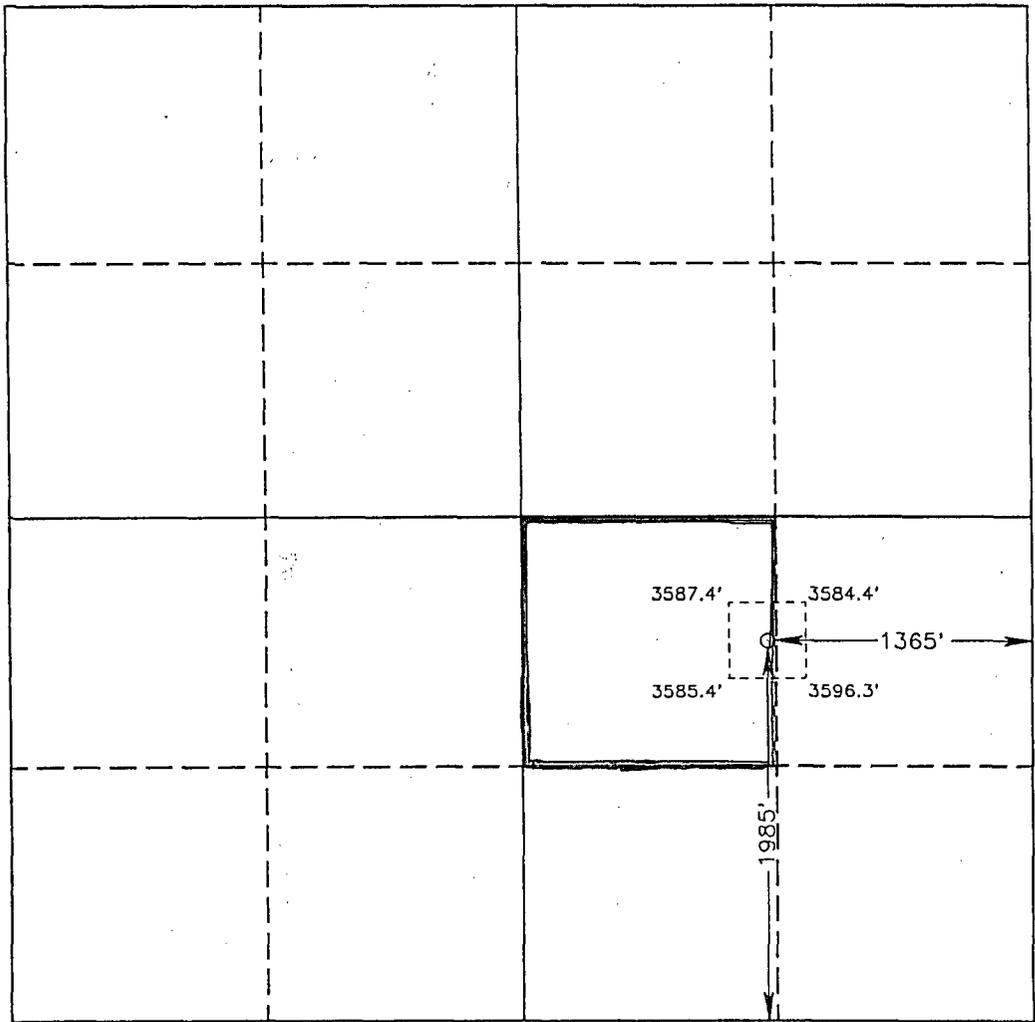
WELL LOCATION AND ACREAGE DEDICATION PLAT

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Operator MARBOB ENERGY CORP.			Lease Burch-Keely Unit			Well No. 218		
Unit Letter J	Section 23	Township 17 SOUTH	Range 29 EAST	NMPM	County EDDY			

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Signature: *Rhonda Nelson*
 Printed Name: Rhonda Nelson
 Position: Production Clerk
 Company: Marbob Energy Corporation
 Date: July 7, 1993

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: JUNE 2, 1993
 Signature & Seal of Professional Surveyor