

MU+DKØØ1.
Mid-Continent Region
Exploration/Production

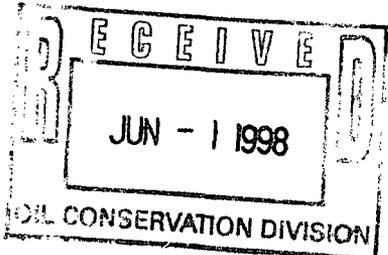


NSL 6/22/98

Conoco Inc.
10 Desta Drive, Suite 100W
Midland, TX 79705-4500
(915) 686-5400

May 28, 1998

Mr. Michael Stogner
New Mexico Oil Conservation Division
2040 Pacheco
Santa Fe, New Mexico 87504



RE: Application for Non-Standard location
San Juan 28-7 Unit well # 98M
API # - N/A
Sec 29, T-27-N, R-7-W, F
2005' FNL & 2170' FWL
Rio Arriba County, New Mexico

Dear Mr. Stogner,

The proposed drilling and completion of this well in the Mesaverde and in the Dakota requires Conoco, Inc to request a non-standard location order. The subject well is located 2170' from the west line of section 29. The well is only 470' from the center section line and the pool rules state that it needs to be 790'

The primary reason for having to stake a non-standard location is that a standard location would fall inside the Crow Canyon Area of Critical Environmental Concern. Crow Canyon is a 4380 acre area that contains significant cultural values. This is the only location acceptable due to the vast number of archaeological features in this region and the drastic relief in topography. Please find attached a letter from the Neale C. Edward Survey Company and from the BLM of Farmington, NM reiterating the above.

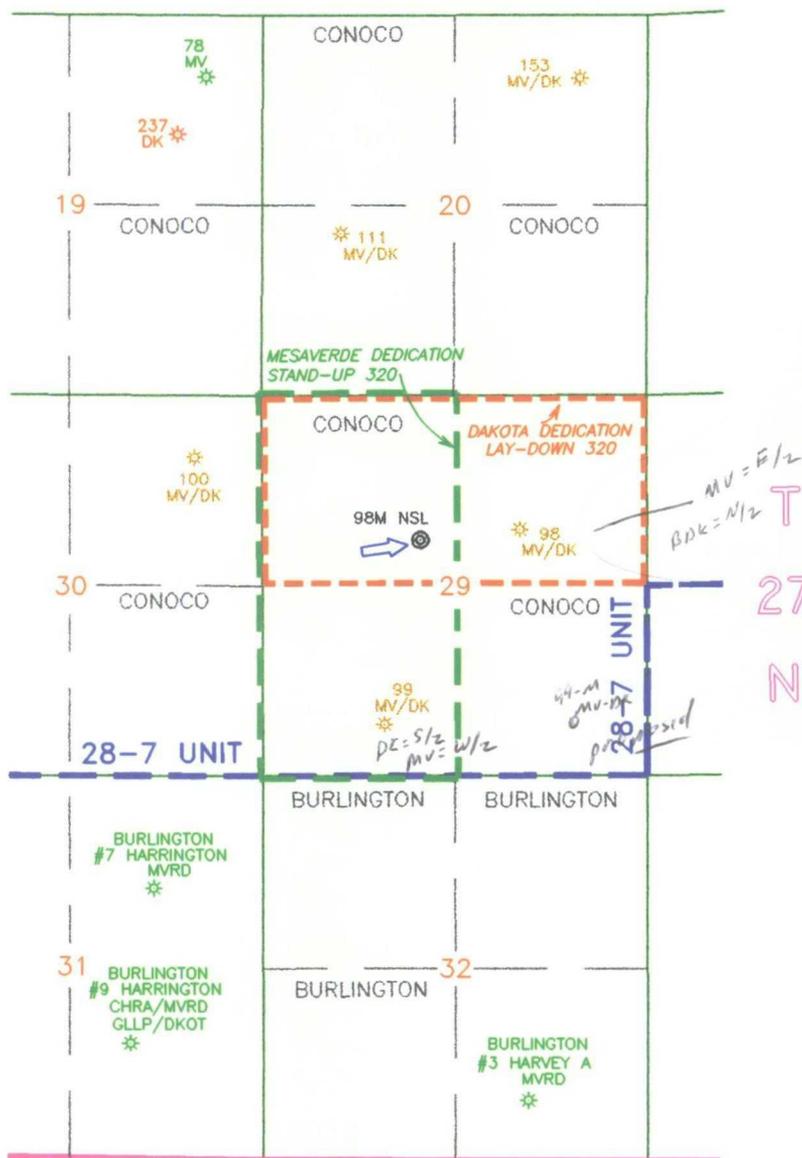
The proposed well will be completed and tested separately in the Mesaverde and Dakota formations and eventually will be downhole commingled. The offset operator plat shows the operators that could be affected by this non-stand location and enclosed is evidence that they have been notified.

A Non-Standard location order is requested based on the reasons stated above. If there are any further question s regarding this application please call at (915) 686-5798.

Sincerely,
Kay Maddox
Kay Maddox
Regulatory Agent

Cc: Oil conservation Division – Aztec
William J . Director – OCD – Santa Fe

R 7 W



**SAN JUAN 28-7 UNIT
RIO ARRIBA CO., N.M.**

<p>NOTES</p> <p>LOCATION IS NON-STANDARD TOWARDS AN INTERIOR UNIT LINE. CONOCO OPERATES ALL WELLS IN THE 28-7 UNIT. NUMEROUS ARCH SITES IN THE BLM'S CROW CANYON A.C.E.C. AND TOPOGRAPHIC CONSTRAINTS NECESSITATE A NON-STANDARD LOCATION.</p>	<p>DATE: 05/27/98</p>	<p>conoco EPNGNA MIDLAND DIVISION</p>	
	<p>DRAWN BY: GLG</p>	<p>CONOCO 28-7 UNIT MESAVERDE & DAKOTA PRODUCERS</p>	
	<p>CHECKED BY:</p>	<p>San Juan 28-7 Unit #98M Non-Standard Location</p>	
	<p>APPROVED BY:</p>	<p>STATE API NUMBER COUNTY WELL</p> <p>30 - 039 -</p>	<p>DRAWING</p> <p>28-7_98M</p>
	<p>SCALE: 1" = 2640'</p>	<p>CONOCO INC. OFFICE 10 DESTA DRIVE WEST MIDLAND, TEXAS 79705</p>	
<p>STATE PLANE COORDINATES REFERRED TO NAD27 - N.M. WEST STATE PLANE COORDINATES ZONE - 3003</p>			

May 28, 1998

San Juan 28-7 Unit Well # 98 M
Sec 29, T-27-N, R-7-W, F
Rio Arriba, New Mexico

RE: Non- Standard Location Request

Offset Operator:

Burlington Resources
PO Box 4289
Farmington, NM 87499

P 497 374 062

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Burlington Resources	
Street & Number PO Box 4289	
Post Office, State, & ZIP Code Farmington, N.M 87499	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

A copy of the Non-Standard location request was sent to the above listed party on this the 28th of May.

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

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994

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

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

Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

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

AMENDED REPORT

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

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code	*Pool Name
		72319/71599	Blanco Mesaverde/Basin Dakota (LAY DOWN)
*Property Code	*Property Name		*Well Number
16608	SAN JUAN 28-7 UNIT		98M
*OGRID No.	*Operator Name		*Elevation
005073	CONOCO, INC.		6586'

¹⁰ Surface Location

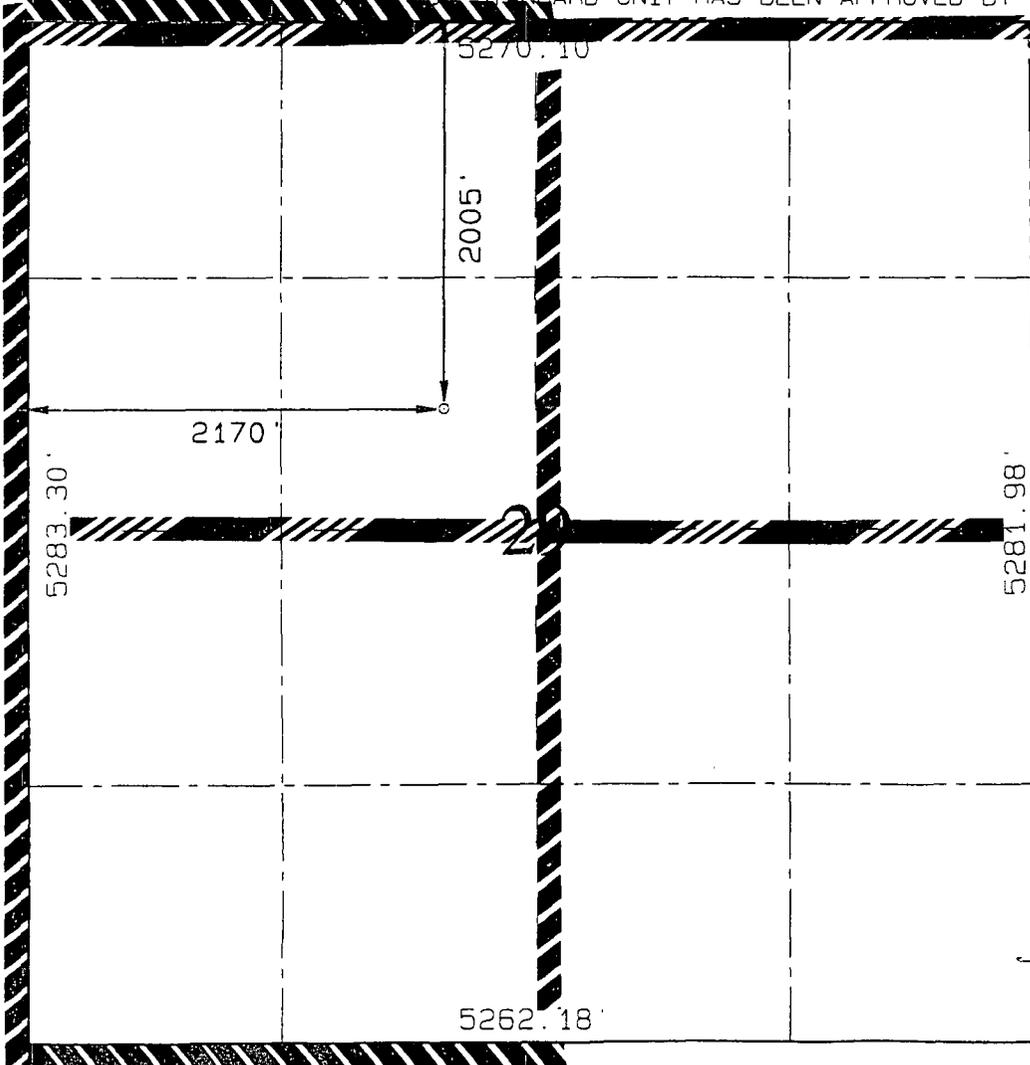
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
F	29	27N	7W		2005	North	2170	West	RIO ARRIBA

¹¹ 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

¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
320			

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



¹⁷ OPERATOR CERTIFICATION

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

Mike L Mankin
Signature

MIKE L. MANKIN
Printed Name

RIGHT-OF-WAY AGENT
Title

5-21-98
Date

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

DECEMBER 12, 1997
Date of Survey

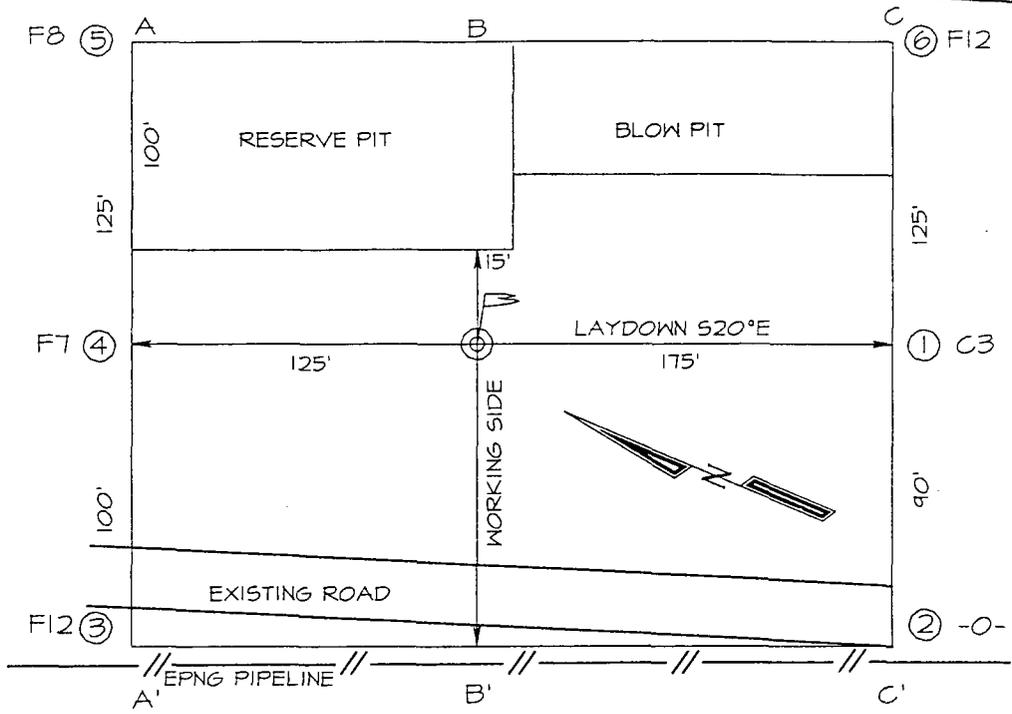
Signature and Seal of Professional Surveyor



6857
Certificate

CONOCO, INC.
 SAN JUAN 28-7 UNIT #98M, 2005' FNL, 2170' FWL
 SECTION 29, T27N, R7W, NMPM
 RIO ARriba COUNTY, NEW MEXICO
 GROUND ELEVATION: 6586'

LATITUDE: 36°32'47"
 LONGITUDE: 107°35'58"



A-A'							
6596'							
6586'							
6576'							

B-B'							
6596'							
6586'							
6576'							

C-C'							
6596'							
6586'							
6576'							

Directions from Blanco, NM Post Office to Conoco San Juan 28-7 Unit #98M

2005' FNL & 2170' FWL, Section 29, T27N, R7W, Rio Arriba County, NM.

Travel Easterly on US HWY 64 for 1.3 miles across the San Juan River to County Road 4450;

Go right (Southerly) on County Road 4450 for 3.7 miles to major road intersection;

Go left (Southeasterly) for 5.0 miles to fork in road;

Go right (Southeasterly) across Carrizo Wash for 4.4 miles to fork in road;

Go right (Southerly) for 3.3 miles up Gould Pass to fork in road;

Go left which is straight (Southeasterly) for 0.5 miles to fork in road;

Go right (Southerly) for 1.4 miles to fork in road;

Go left (Southeasterly) for 2.8 miles to fork in road;

Go right (Southwesterly) for 0.7 miles to fork in road;

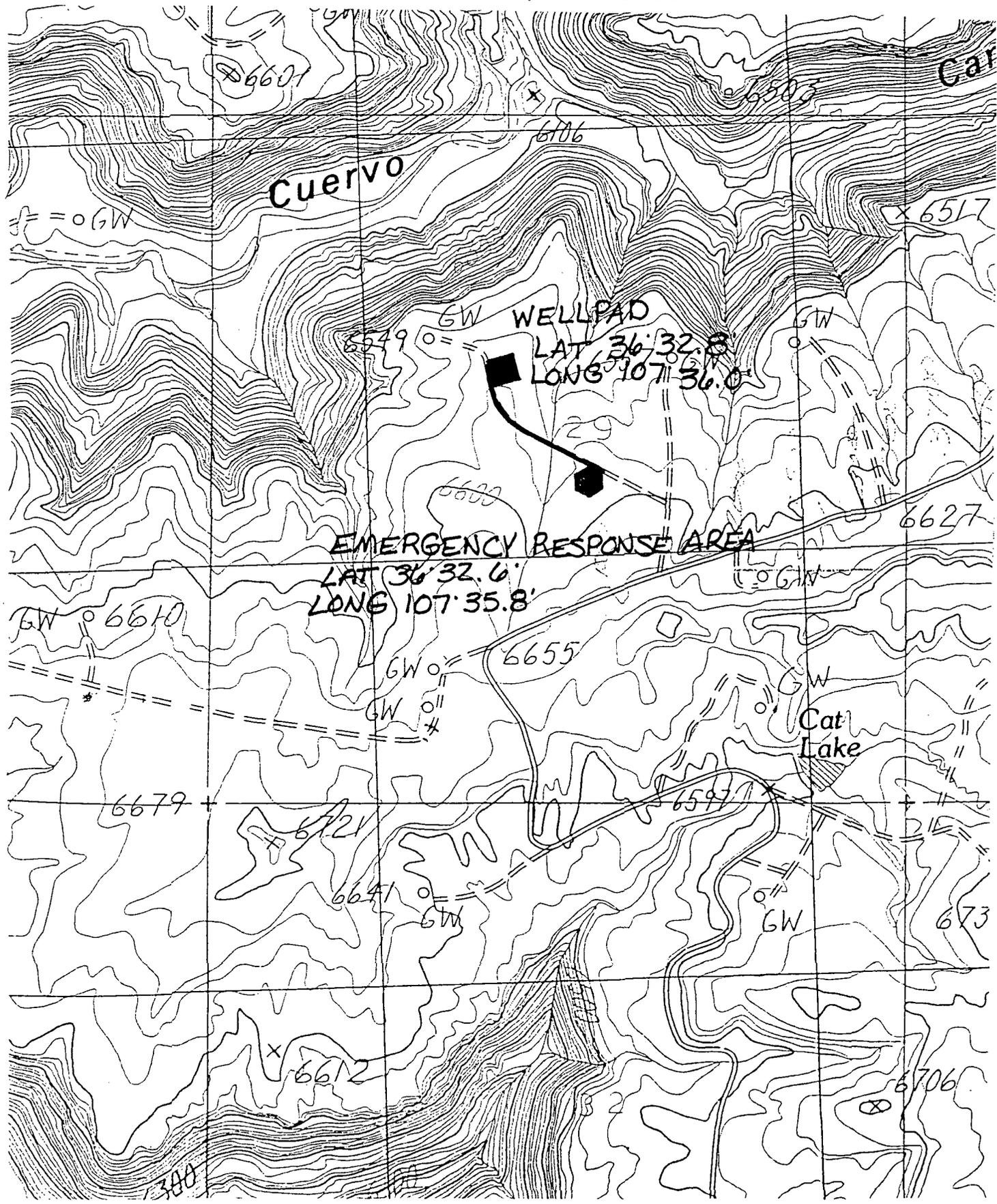
Go left (Northwesterly) for 1.3 miles to fork in road;

Go right (Northerly) for 0.1 miles to fork in road;

Go left (Northwesterly) for 0.5 miles to staked location on right hand side of road..

EMERGENCY RESPONSE AREA

CONOCO, INC. SAN JUAN 28-7 UNIT #98M
2005' FNL & 2170' FNL SECTION 29, T27N, R7W, N.M.P.M.
RIO ARriba COUNTY, NEW MEXICO



DECEMBER 12, 1997

CONOCO, INC.
SAN JUAN 28-7 UNIT #98M
2005' FNL, 2170' FWL,
SEC.29, T27N, R7W, NMPM
RIO ARRIBA COUNTY, NM

TO WHOM IT MAY CONCERN @ CONOCO, INC.:

REASONS FOR NON-STANDARD LOCATION:

THE PRIMARY REASON FOR THE NON-STANDARD STAKING OF THE SAN JUAN 28-7 UNIT #98M IS THAT THE PROPOSED LOCATION OCCUPIES A RECREATIONAL AREA KNOWN AS CROW CANYON. THE BUREAU OF LAND MANAGEMENT WILL NOT ALLOW ANY NEW DEVELOPEMENT IN THIS DESIGNATED AREA DUE TO THE VAST NUMBER OF ARCHEOLOGICAL FEATURES WHICH ARE PRESENT IN THIS REGION. THE REMAINDER OF THE LEGAL AREA OF THE SECTION IS NOT SUITABLE FOR THE PROPOSED WELL LOCATION DUE TO THE DRASTIC RELIEF IN TOPOGRAPHY WHICH LENDS ITSELF TO HIGH CONSTRUCTION COSTS, NON-ACCEPTANCE BY THE BLM, AND STEEP ACCESS WHICH IS DIFFICULT TO ADEQUATELY MAINTAIN. FOR THESE REASONS, THE LOCATION STAKED AT 2005' FNL 2170' FWL WILL HOPEFULLY BE ACCEPTABLE.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Farmington District Office
1235 La Plata Highway
Farmington, New Mexico 87401

IN REPLY REFER TO:
NM 03560
3162.3-1 (070600)

JAN 27 1998

Conoco Incorporated
Attn: Mike Mankin
10 Desta Drive, Suite 430E
Midland, TX 79705

Dear Mr. Mankin:

This is in reference to the placement of the proposed San Juan 28-7 Unit number 98M Mesaverde/Dakota well, located 2005' FNL, 2170' FWL, Sec. 29, T. 27 N., R. 7 W., lease number NM 03560. After attempting to find a suitable location within the windows established by the New Mexico Oil Conservation Commission, we suggest you submit for a nonstandard location. A suitable orthodox location was not found because of archeological concerns, topographical constraints, and the environmental surface damage that would have been created with the construction of the pad and access road. The proposed standard and nonstandard locations are situated within the Bureau of Land Management's Crow Canyon Area of Critical Environmental Concern (ACEC). The Crow Canyon ACEC is a 4,380 acre area that contains significant cultural values listed on the National Register of Historic Places. The designation of an ACEC requires that additional measures be considered when choosing sites for new wells or facilities located in the area. Management of this ACEC includes protective guidelines that will help preserve the cultural values of the area. New development will not be allowed within the canyon bottom or on benches above the bottom of Crow Canyon. New disturbance within the ACEC must be restricted to the absolute minimum required for the safe operation and construction of facilities, and all disturbance must be masked to retain the visual qualities of the area (Albuquerque District Proposed Resource Management Plan Amendment/Final Environmental Impact Statement, December 1991, pg. 2-32). These requirements could not be met with an orthodox location.

In the past it has been discussed that nonstandard locations would probably be proposed more frequently as the more desirable locations are developed. It is our desire to find the best possible locations for new wells and access roads being proposed with minimal environmental impacts. Therefore, we will be glad to support your nonstandard proposal for the San Juan 28-7 Unit number 98M well to the NMOCC.

If there is any way we can be of further assistance, please contact Jackie Neckels of the Environmental Compliance Staff at (505) 599-6323.

Sincerely,

Senior Technical Advisor
Environmental Compliance