



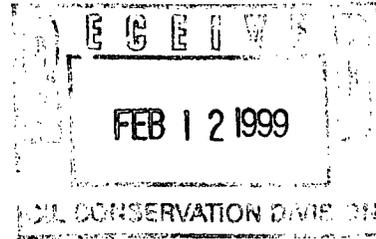
NSL 3/4/99

Mid-Continent Region
Exploration/Production

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

February 10, 1999

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



Re: Application for Non-Standard Location
Basin Dakota Pool
San Juan 28-7 Unit #186M
2095' FNL & 1940' FWL
Unit Ltr. F, Section 13-T28N-R7W
Rio Arriba County, New Mexico

Dear Mr. Stogner,

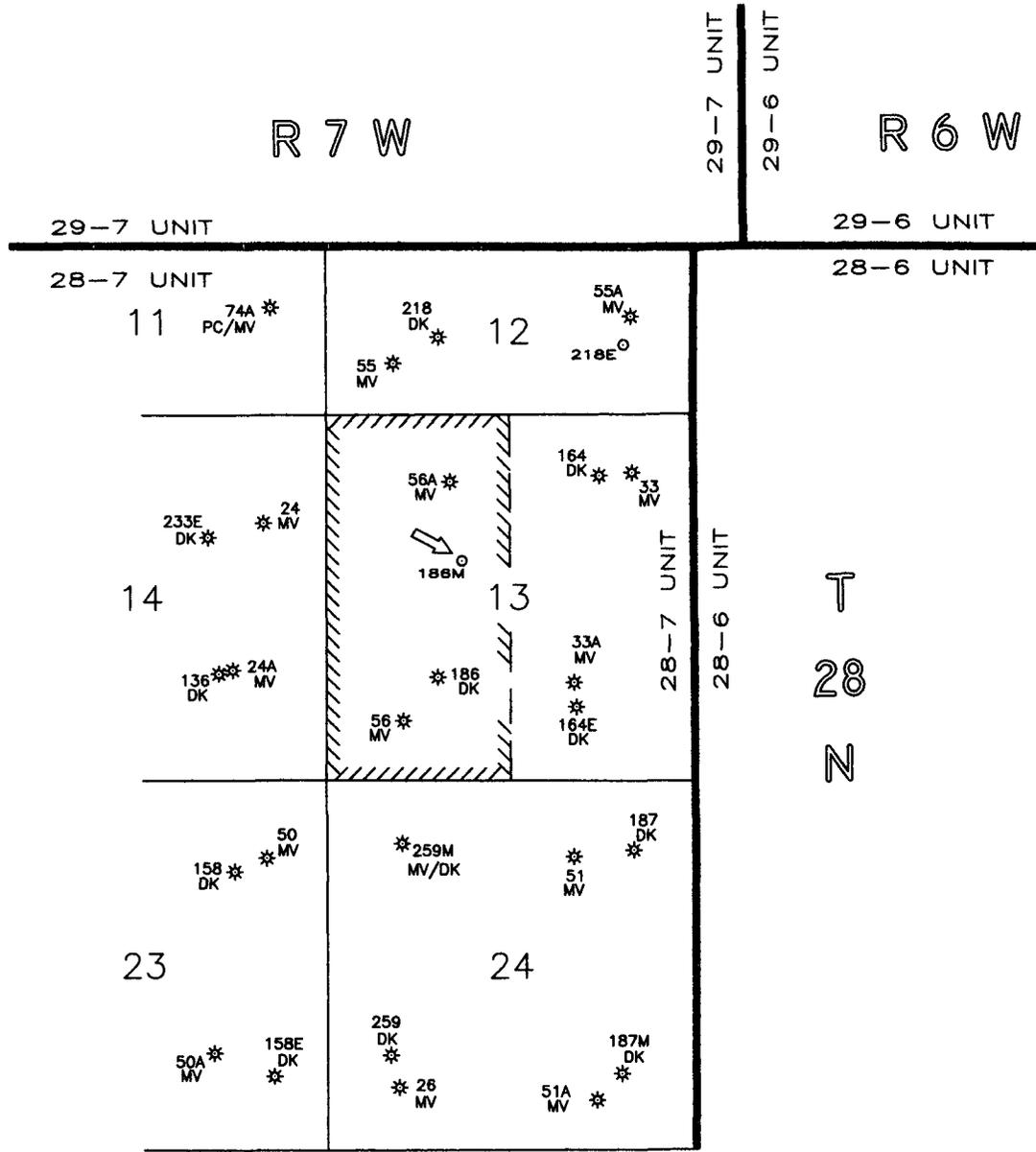
Conoco Inc. plans to drill the above referenced well in 1999. The Basin Dakota pool rules state that this well must be 790' from the quarter section lines. The well is staked 2095' FNL & 1940' FWL. This location places the well only 545' from the southern quarter section line and 700' from the center section line thereby requiring this application for a non-standard location order. The referenced location is an open, 160 acre Dakota infill site. In an effort to prevent waste and too effectively / efficiently develop and produce the 28-7 Unit to its fullest potential, Conoco selected this location to serve two purposes. The location will serve to accommodate both a primary, 160 acre Dakota infill, and an 80 acre Mesaverde infill withdrawal point (per Order No. R-10987-A, issued out of case No. 12069). Topography, arch, and infrastructure also played a role in limiting our location selection. The ability to access both horizons in a single wellbore will reduce development costs and surface disturbance. Please note that the location is interior to the 28-7 Unit, and does not encroach on any Unit boundaries. An application to downhole commingle (C-107A) Blanco Mesaverde and Basin Dakota will be filed concurrently (per Order No. R-10476-B, issued out of case No. 11815).

Conoco respectfully requests that a non-standard location for the Basin Dakota Pool be issued for the referenced well for the reasons cited above. If there are any questions concerning this application, please feel free to call me at (915) 686-5798.

Sincerely,

Kay Maddox
Regulatory Agent

cc - Artec



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

<p>NOTES</p> <p>Conoco operates all wells in the 28-7 Unit, NSL is interior to the 28-7 Unit. Map shows only Mesaverde and Dakota wells. A Basin Dakota NSL is requested in order to accommodate both a primary 160 acre Dakota infill and an '80 acre' Mesaverde infill (per order No. R-10987-A out of case 12069).</p>	<p>DATE: 2/10/99</p>		<p>CONOCO EPNGNA MIDLAND DIVISION</p>											
	<p>DRAWN BY: GLG</p>		<p>CONOCO 28-7 UNIT MESAVERDE & DAKOTA PRODUCERS San Juan 28-7 Unit # 186M Basin Dakota Pool Non-Standard Location</p>											
	<p>CHECKED BY:</p>													
	<p>APPROVED BY:</p>		<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">STATE</td> <td style="text-align: center;">API</td> <td style="text-align: center;">COUNTY</td> <td style="text-align: center;">WELL</td> <td style="text-align: center;">DRAWING</td> </tr> <tr> <td style="text-align: center;">30</td> <td style="text-align: center;">\</td> <td style="text-align: center;">039</td> <td style="text-align: center;">\</td> <td style="text-align: center;">28-7_186</td> </tr> </table>		STATE	API	COUNTY	WELL	DRAWING	30	\	039	\	28-7_186
	STATE	API	COUNTY	WELL	DRAWING									
30	\	039	\	28-7_186										
<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>														

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 00, Artesia, NM 88211-0719

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

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

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	
*Property Code		*Property Name			*Well Number
016608		SAN JUAN 28-7 UNIT			186M
*OGRID No.		*Operator Name			*Elevation
005073		CONOCO, INC.			6661

¹⁰ Surface Location

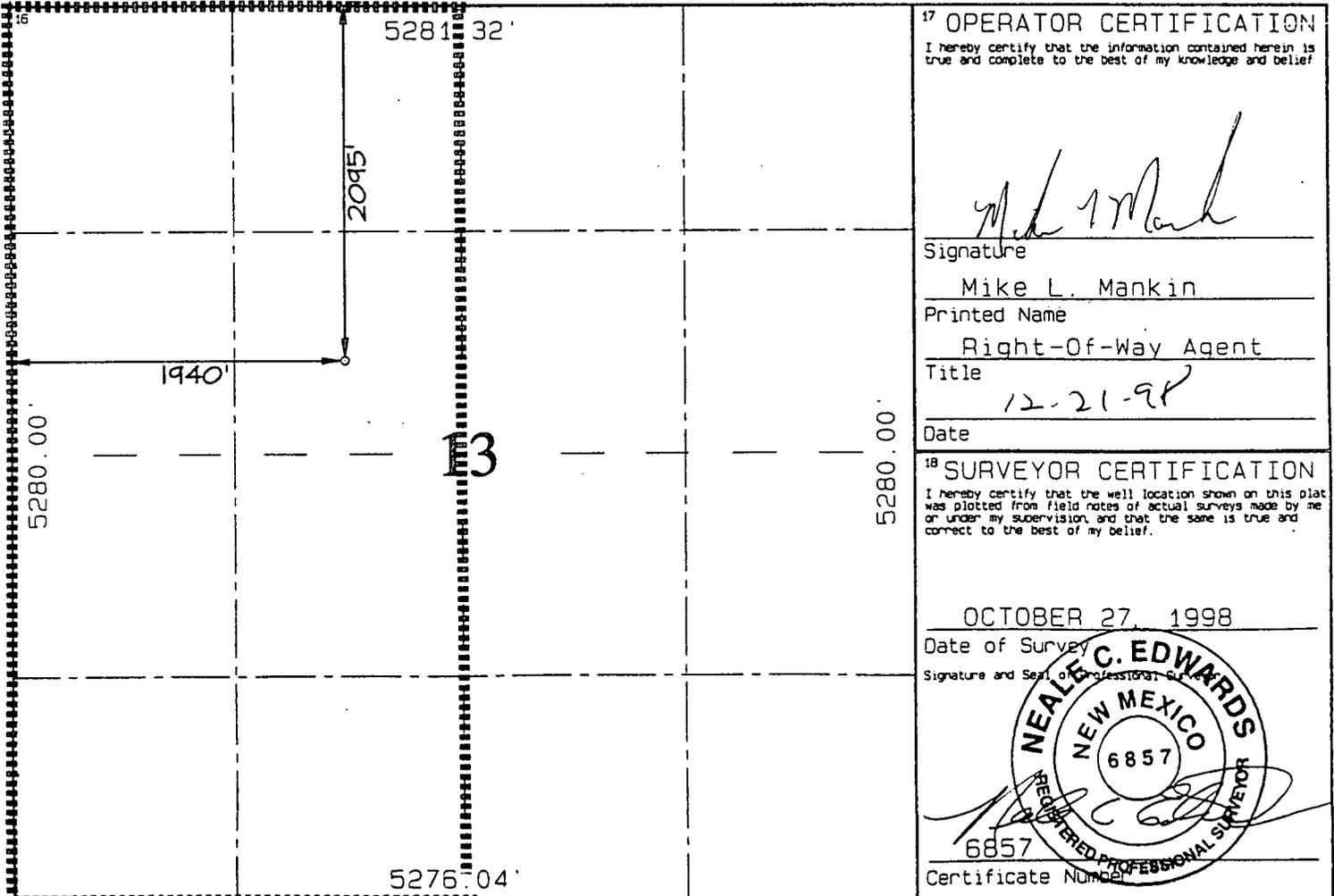
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
F	13	28N	7W		2095	NORTH	1940	WEST	RIO ARRIBA

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.

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
 12-21-98
 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.

OCTOBER 27, 1998
 Date of Survey
 Signature and Seal of Professional Surveyor

 6857
 Certificate Number

District I
 PO Box 1980, Hobbs, NM 88241-1980
 District II
 PO Drawer DD, Artesia, NM 88211-0719
 District III
 1000 Rio Brazos Rd. Aztec, NM 87410
 District IV
 PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
 Energy, Minerals & Natural Resources Department

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

Revised February 21, 1994
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 Submit to Appropriate District Office
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AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number		2 Pool Code		3 Pool Name	
		72319/71599		Blanco Mesaverde/Basin Dakota	
4 Property Code		5 Property Name			6 Well Number
016608		San Juan 28-7 Unit			# 186M
7 OGRID No.		8 Operator Name			9 Elevation
005073		Conoco Inc., 10 Desta Drive, Ste. 100W, Midland, TX 79705-4500			6661'

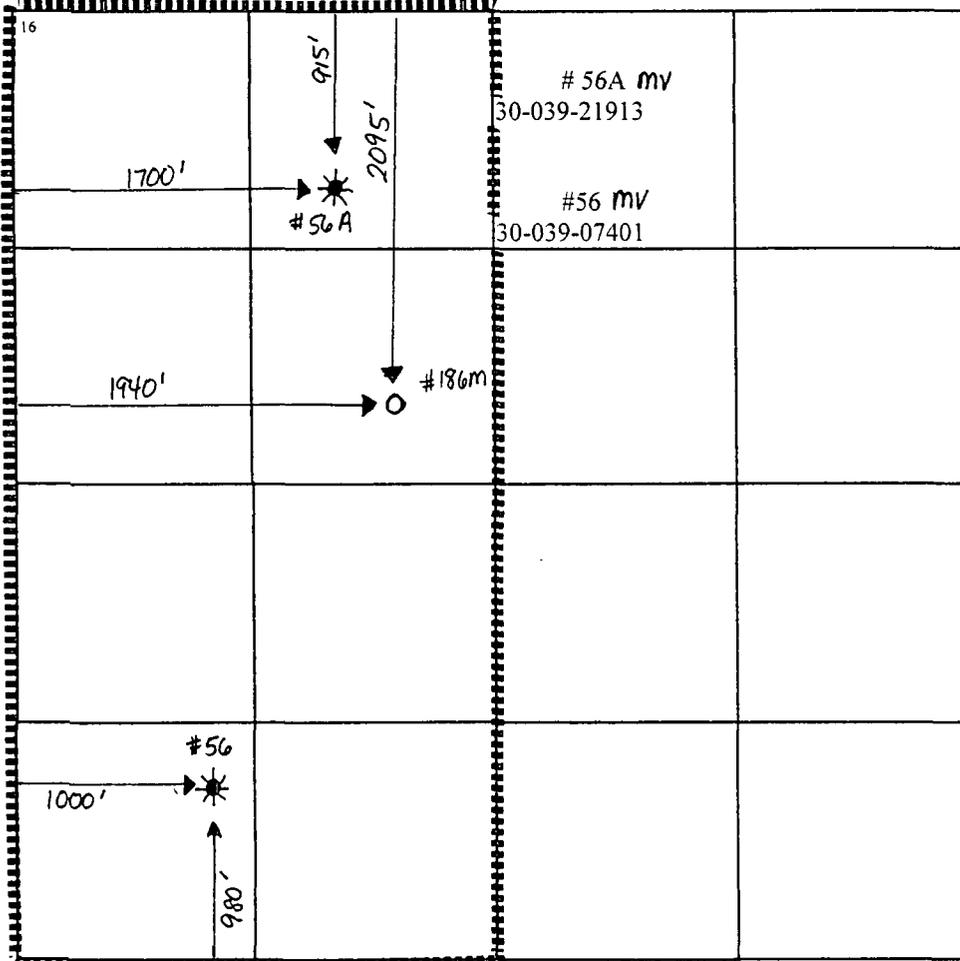
10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
F	13	28N	7W		2095'	North	1940'	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						R 10987A			

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

Kay Maddox
 Signature
 Kay Maddox
 Printed Name
 Regulatory Agent
 Title
 February 8, 1999
 Date

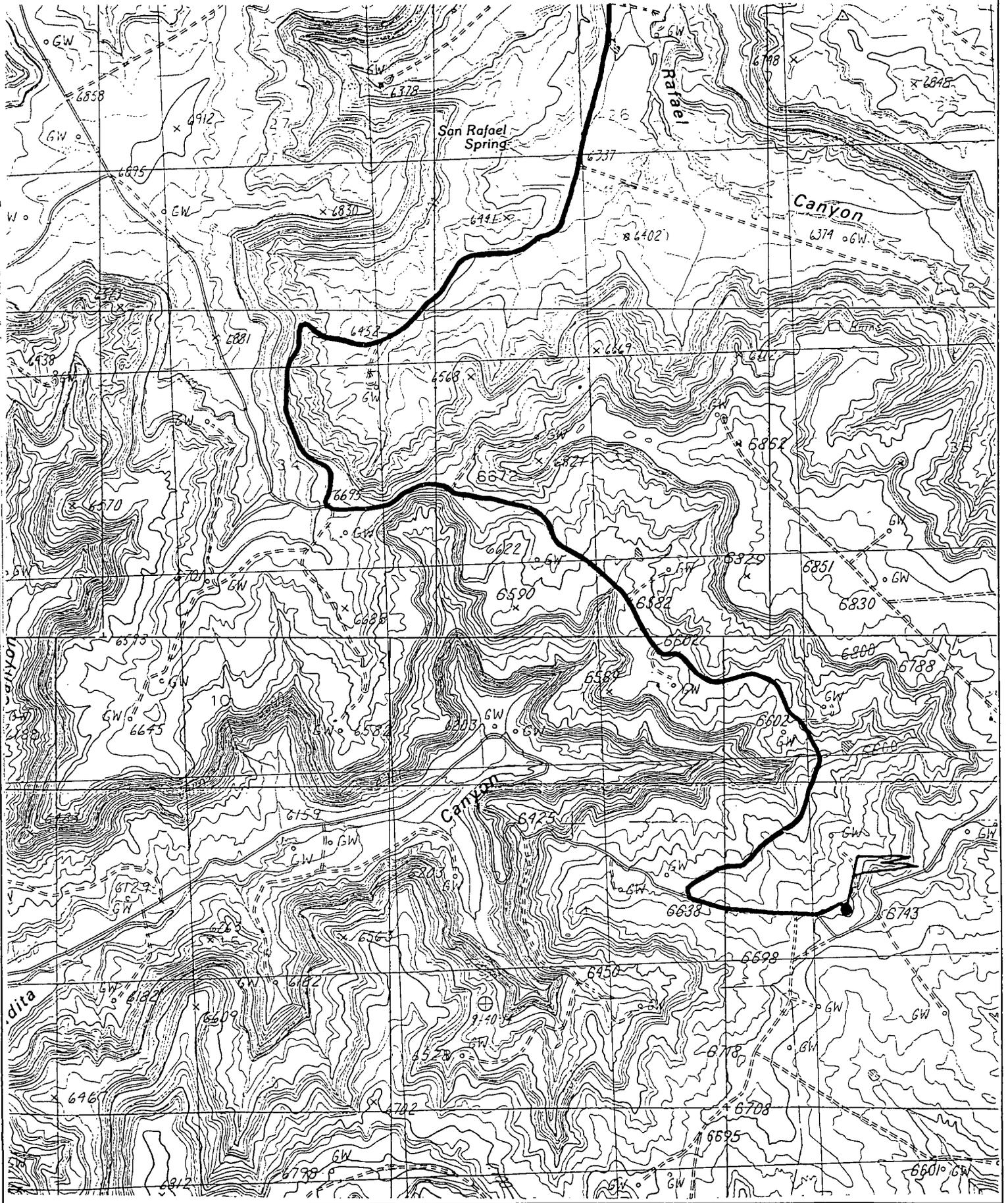
18 SURVEYOR CERTIFICATION

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.

Date of Survey
 Signature and Seal of Professional Surveyor:

Certificate Number

CONOCO, INC. SAN JUAN 28-7 UNIT #186M
2095' FNL & 1940' FWL, SECTION 13, T28N, R7W, N.M.P.M.
RIO ARRIBA, NEW MEXICO



February 10, 1999

San Juan 28-7 Unit Well # 186M

Conoco, Inc. is the sole operator of the 28-7 Unit. This well does not encroach on any outside unit boundary lines therefore there are no offset operators to be notified.

CMD :
OG5SECT

ONGARD
INQUIRE LAND BY SECTION

02/16/99 09:18:05
OGOMES -TPVR
PAGE NO: 1

Sec : 13 Twp : 28N Rng : 07W Section Type : NORMAL

D 40.00 Federal owned U	C 40.00 Federal owned U A	B 40.00 Federal owned U A A	A 40.00 Federal owned U A A
E 40.00 Federal owned U	F 40.00 Federal owned U	G 40.00 Federal owned U	H 40.00 Federal owned U

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06
PF07 BKWD PF08 FWD PF09 PRINT PF10 SDIV PF11 PF12

CMD :
OG5SECT

ONGARD
INQUIRE LAND BY SECTION

02/16/99 09:18:10
OGOMES -TPVF
PAGE NO: 2

Sec : 13 Twp : 28N Rng : 07W Section Type : NORMAL

L 40.00 Federal owned U	K 40.00 Federal owned U A A	J 40.00 Federal owned U A	I 40.00 Federal owned U
M 40.00 Federal owned U A	N 40.00 Federal owned U	O 40.00 Federal owned U A	P 40.00 Federal owned U

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06
PF07 BKWD PF08 FWD PF09 PRINT PF10 SDIV PF11 PF12

CMD : ONGARD 02/16/99 09:18:23
OG6IWCM INQUIRE WELL COMPLETIONS OGOMES -TPVF

API Well No : 30 39 20644 Eff Date : 03-01-1995 WC Status : A
Pool Idn : 71599 BASIN DAKOTA (PRORATED GAS)
OGRID Idn : 5073 CONOCO INC
Prop Idn : 16608 SAN JUAN 28 7 UNIT

Well No : 186
GL Elevation: 99999

	U/L	Sec	Township	Range	North/South	East/West	Prop/Act (P/A)
B.H. Locn	: K	13	28N	07W	FTG 999 F S	FTG 999 F E	P

Lot Identifier:

Dedicated Acre: 320.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06
PF07	PF08	PF09	PF10 NEXT-WC	PF11 HISTORY	PF12 NXTREC