2/2/99 2/22/99 ms M NSL

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS **Application Acronyms:** [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response] TYPE OF APPLICATION - Check Those Which Apply for [A] [1]Logation - Spacing Unit - Directional Drilling Z NSL ☐ NSP USERVATION DIVIS Check One Only for [B] or [C] Commingling - Storage - Measurement ☐ DHC ☐ CTB D PLC \Box PC 🗖 OLS OLM OLM Injection - Disposal - Pressure Increase - Enhanced Oil Recovery □ WFX \square PMX □ SWD **EOR** ☐ PPR NOTIFICATION REQUIRED TO: - Check Those Which Apply, or \(\bigcup \) Does Not Apply [2] Working, Royalty or Overriding Royalty Interest Owners Offset Operators, Leaseholders or Surface Owner [B] Application is One Which Requires Published Legal Notice [C][D] ☐ Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office [E] For all of the above, Proof of Notification or Publication is Attached, and/or, [F] ☐ Waivers are Attached [3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I further verify that all applicable API Numbers are included. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken. Statement must be completed by an individual with supervisory capacity JAMES BRUCE P.O. BOX 1056 **SANTA FE, NM 87504** Print or Type Name

JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

February 2, 1999

Hand Delivered

Michael E. Stogner Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Pursuant to Division Rule 104.F.(2), Pogo Producing Company ("Pogo") applies for administrative approval of an unorthodox oil well location for the following well:

Pure Gold "B" Fed. Well No. 20 1260 feet FSL & 250 feet FEL SE½SE½ (Unit P) §20, Township 23 South, Range 31 East, NMPM Eddy County, New Mexico

Attached as Exhibits A and B are an APD (BLM Form 3160-3) and a Form C-102 for the well. (Please note that the existing Pure Gold "B" Fed. Well No. 4 is also located in Unit P.)

The well will be drilled to a depth sufficient to test the Delaware formation (West Sand Dunes-Delaware Pool). The pool is governed by statewide rules, with 40 acre spacing and wells to be located no closer than 330 feet to a quarter-quarter section line.¹

The proposed location is based upon geologic and engineering reasons. Attached as Exhibits C and D are a structure map and reservoir thickness map, respectively, of the Lower Brushy Canyon BC4 zone (one of the primary pay zones in this area). The proposed location is based on well control, and is interpreted to be at a high structural position in a thick part of the reservoir. The better the well's structural position, the better its chances to encounter potential Brushy Canyon pay.

 $^{^{}m l}$ The pool has an 8000:1 GOR under Division Order No. R-10086.

The proposed well is located approximately equi-distant between two existing wells in the E½SE¼ of Section 20 and two existing wells in the W½SW¼ of Section 21. Pogo anticipates recovering reserves that will not be recovered by the existing wells. In addition, the well is situated for possible use as a future injection well, in the event a pressure maintenance or waterflood project is instituted in this area.

Submitted as Exhibit E is a land plat of the subject area, with the location of the proposed well marked thereon. The S½ of Section 20 is subject to federal lease NM 38463, in which Pogo owns 100% of the working interest. The S½ of Section 21 is subject to federal lease NM 38464, in which Pogo also owns 100% of the working interest. Overriding royalty ownership is common in the two leases, both as to owners and percentages, except that the following owner has different percentage ownership in the two leases:

Marbob Energy Corporation Suite 103 324 West Main Street Artesia, New Mexico 88211

A copy of the notice letter mailed to the affected overriding royalty owner is attached as Exhibit F.

This application is submitted in duplicate. Please call me if you need anything further on this matter.

Very truly yours,

James Bruce

Attorney for Pogo Producing Company

cc: Scott McDaniel

UNITED STATES

14:58 #781 P.09/10

Form 3160-3 (July 1992)

SUBMIT IN TRIPLICATE-(Other instructions on reverse side)

FORM APPROVED OMB NO. 1004-0136 Expire: February 28, 1995

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OR APPLIED FOR ON TH	TE LEASE, FT.		82001		ROTARY
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signed	nems data on substantiace location				proposed new productive some. If proposal is to drill or program, if any, DATE 01/15/99
POEM OF NOApplication approval does to conditions of applications.		licant holds legal or eq	APPENVAL DAYS _	ths subject lesse	e which would exide the applicant to conduct operations there
APPROVED BY		TITLE			DATE

*See lastructions On Reverse Side

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department



1999,02-01 14:58 #781 P.10/10

State of New Mexico DISTRICT I P.A. Dat 1986, Subba, 274 08941-1999

Sporgy, Minerale and Natural Sporgrass Department

Form C-102 Revised February 10, 1094 Submit to Apprepriate Bistrict Office State Lease — 4 Copies For Lease — 3 Copies

DISTRUCT II P.A. Broom DO, Literia, NS 68611-0710

DISTRICT III 1000 Ma Branco Md. Artec, NM 67410 OIL CONSERVATION DIVISION P.O. Box 2088

DISTRICT IV P.O. 2000 8280, SANTA FE. M.M. 67864-2008 Santa Fe. New Mexico 87504-2088

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Poel Code	Poel Nemo		
	53815	SAND DUNES-DELAWARE WEST		
Property Code	Per	operty Name Well Numb LLD B FEDERAL 20		
17891		Brator Masso DUCING COMPANY	Bevauca 3340'	

Surface Location

UL ar let No.	Section.	Township	Rango	Lot ldn	Feet from the	North/South line	Foot from the	East/West Une	Contra
Р	20	23 S	31 E		1260	SOUTH	250	EAST	EDDY

Bottom Hole Location II Different From Surface

UL or lot No.	Section	Township	Bangs	Let idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated acres 40	Jeint er	Infill Co.	enijabijos (0m	ler No.				
1	ł	1							

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED

(OR A NON-STAND	ARD UNIT HAS BEE	N APPROVED BY TH	E DIVISION
				OPERATOR CERTIFICATION I hereby derryly the the bytermedien contained hereby is true and complete to the best of my ineveloge and balle! Strature Joe T. Japaica Printed Name Agent Title 01/14/99 Date
		3340.4' 3341.3' 0	SEE DETAIL	SURVEYOR CERTIFICATION I hereby verify that the well levelles shows on this plat was platted from field notice of several overeign made to the or under my experience, and that the came to from ord correct to the best of my belief. JANUARY 13, 1999 Bate Surveyed annual from COG Right Surveyed annual from 1299 Profit beaut of Boal Right Surveyers of the COG Right Surveyed annual from 1299 Combined to Rock of the Combined Surveyers of the COG Combined to Rock of the Combined Surveyers of the Combined S



· Proposed location

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JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

February 2, 1999

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Marbob Energy Corporation Suite 103 324 West Main Street Artesia, New Mexico 88211

Attention: Raye P. Miller

Dear Sirs:

Pogo Producing Company has filed an application with the New Mexico Oil Conservation Division requesting administrative approval of an unorthodox oil well location for the following well:

Pure Gold "B" Fed. Well No. 20 1260 feet FSL and 250 feet FEL SE%SE% §20, Township 23 South, Range 31 East, NMPM Eddy County, New Mexico

A copy of the application is enclosed. If you object to the location, you must notify the Division in writing by February 22, 1999. The Division's address is 2040 South Pacheco Street, Santa Fe, New Mexico 87505 (Attention: Michael E. Stogner).

Very truly yours,

James Bruce

Attorney for Pogo Producing Company



JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

February 2, 1999

Hand Delivered

Michael E. Stogner Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Dear Mr. Stogner:

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Marbob Energy Corporation Suite 103 324 West Main Street Artesia, New Mexico 88211

A copy of the notice letter mailed to the affected overriding royalty owner is attached as Exhibit F.

This application is submitted in duplicate. Please call me if you need anything further on this matter.

Very truly yours,

James Bruce

Attorney for Pogo Producing Company

cc: Scott McDaniel

1999,02-01

14:58 #781 P.09/10

Form 3160-3 (July 1992)

SUBMIT IN TRIPLICATE. Betructions on trop aide)

FORM APPROVED OMB NO. 1084-9136 Expires: February 28, 1995

UNITED STATES	TETE:
EPARTMENT OF THE INTERIOR	
BURFALL OF LAND MANAGEMENT	

APPL	BUREAU OF LICATION FOR F	S. LEADE PERIODETION AND SESSAL NO. NM-38463 6. IF SNOTAH, ALLOTTED OF TRIBO HAMD			
	RILL 💂	DEEPEN			7. UNIT ADDRESSES NAME
	OAS OTHER		EJOKIE EX	MULTIPL Zong	S. FARM OIL LEASE HAVE WELL NO.
POGO PRODUCIN		(RICHARI	WRIGHT 915-	685-8140	PURE GOLD "B" FEDERAL # 2
P.O. BOX 1034					10. FIELD AND POOL, GE WILDCAP
1260 FSL & 2 At proposed prod. sc	50' FEL SEC. 20	T225-R31E	EDDY CO. NM		SAND DUNES DELAWARE WEST 11 08C. To E. M. OR BEE. AND SUBVEY OR SEE. SEC. 20. T22S-R31E 12. COUNTY OR PARISH 15. 07425
Approximately	30 miles South	east of Carl	Labad New Mex	ico	EDDY CO. NM
18. Dietaber wrum fro Bo meaber well.	ELME, FT. Ig. yail line, if any) PORED LOCATION* PRIBLING, COMPLETED.	250' 450'	16. NO. OF ACRES IN		17 HO, OF ACSEN ASSESSED TO THIS WELL 4() 20. ROTARY OR CABLE TOULE
OR APPLES FOR ON Y.	bether DP. ST. GR. etc.)	3340' GR.	82001	<u> </u>	ROTARY 22. AFFROE. DATE WORK WILL START! When approved
15.		PROPOSED CASE	ng and cementang	PROGRAM	
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25"	20" Conductor	NA.	40		ement to surface with Redi-mix
	H-40 10 3/4"	32.75	550		450 Sx. Circulate to surface
9 7/8"	J-55 7 5/8" J-55,N-80 4½'	11.6	8200		1000 Sx. Circulate to surface

- 1. Drill 25" hole to 40'. Set 40' of 20" conductor pipe and cement to surface withRedi-Mix.
- 2.0rill 14 3/4" hale to 550'. Run and set 550' of 10 3/4" H-40 32.75# ST&C casing. Cement with 450 Sx. of Class "C" cement + additives, circulate cement to surface.
- 3. Drill 9 7/8" hole to 4050'. Run and set 4050' of 7 5/8" J-55 26.4# ST&C casing. Cement with 1100 Sx. of Class "C" cement + additives, circulate cement to surface.
- 4. Drill 6 3/4" hole to 8200'. Run and set 8200' of 44" J-55 & N-80 11.6# LT&C casing as follows: 1200' of N-80, 6000' of J-55, 1000' of N-80. Cement with 1000 Sx. of Class "H" + additives, estimate top of cement 3000'.

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to despet, give data on present productive zone and proposed new productive zone. If proposal is to drill or

domain diseased onally, give personness data on substantiace locations	and measured and true wortical depths. Give blowest preven	dor program, if any.
SIGNED JOSE JONE	Co FITTE Agent	DATE 01/15/99
(This space for Federal or Spot office use)		
P\$8117 XQ.	APPROVAL DAYS	
Application approval does and warrens or usefully that the appl	icant holds legal or equitable title to these rights in the subject l	case which would exide the applicant to conduct operations there-
CONDITIONS OF APPROVAL IF ANY:		
4		
APPLOVED BY	ms	DATE

*See lastructions On Reverse Side

Title 18 U.S.C. Section 1501, makes it a crime for any person knowingly and willfully to make to any department of the form of



1999,02-01 14:58 #781 P.10/10

DISTRICT I P.A. Das 1880, 1500bc, BM 98841-19820

State of New Mexico

Marrow, Minerale and Matterel Sessentes Department

Form. C-102 Rovined February 16, 1096 Submit to Appropriate District Office State Lange - 4 Copies For Lease - 3 Copies

DISTRICT II P.A. Decom DD. Afforda, JOS 00011-0718

DISTRICT III 1000 Mis Dress Bd., Astes, NM 97410 OIL CONSERVATION DIVISION P.O. Box 2058

DISTRICT IV P.O. BIES DOBA, MANTA FE, W.M. 97604-2006 Santa Fe. New Mexico 87504-2088

D AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Poel Ce	ida Poe	Nonse
	53815	SAND DUNES-DELAWARE W	est
Property Code	Р	PURE GOLD B FEDERAL	Fell Number 20
OCEID No.		Operator Name	Ecration
17891	POC	GO PRODUCING COMPANY	3340'

Surface Location

UL or lot No	Section.	Township	Romes	Lot Ida	fact from the	Kostb/South Has	Foot from the	Bast/West Une	Contra
Р	20	23 S	31 E		1260	SOUTH	250	EAST	EDDY

Bottom Hole Location If Different From Surface

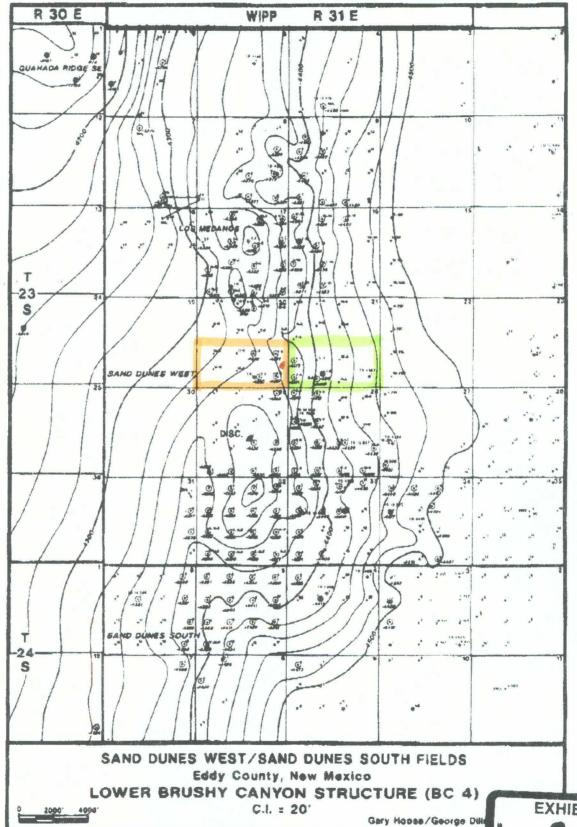
UL or let No.	Section	Township	Bange	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated acros	Jeint of	r Laftii Co	i esolidation (0r	ior No.				

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED

OR A NON-STANDARD UNIT HAS SEEN APPROVED BY THE DIVISION							
				OPERATOR CERTIFICATION / Acroby correct the fine the phormatical contained Acroin to true and complete to the best of my inscribing and bally. The contained of the contained to the best of my inscribing and bally. The contained of the co			
		3340.4' 3341.3' \$\phi 3340.4' 3350.7' DETAIL.	SEE DETAIL	I hereby pertify that the well together shown on the plot was plotted from field make of around oversel oversel and the first of the series of the or unforms oversel to the best of my belief. JANUARY 13, 1999 Bate Surregulamentally COG Regulated Gurveyer 1 ME Gordflesca No. Ronald 19550N 3230. APPESSICA			



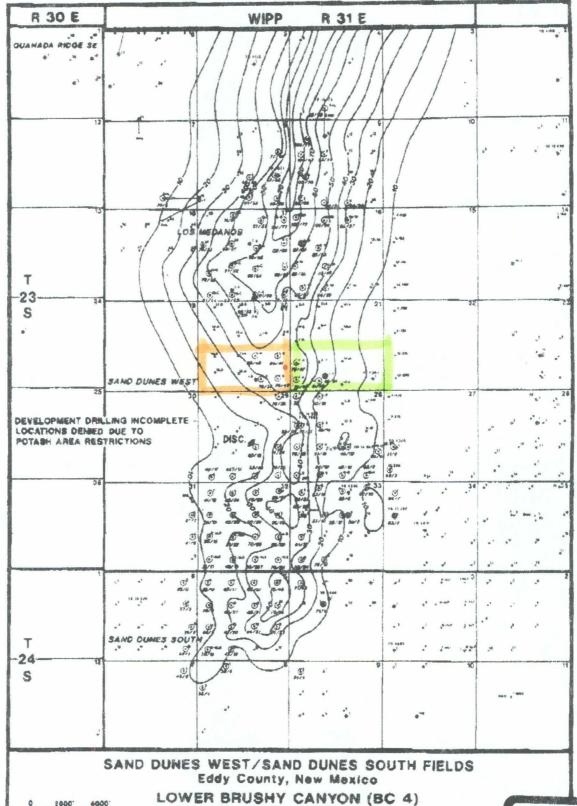
915 6858150



· Proposed location

EXHIBIT

915 5858150





RESERVOIR THICKNESS MAP

(Phi Density ≥14%) Gross Interval/ Net Porosity

Gary Hoose/ George Dilim

EXHIBIT



FROM : POGO-PR	DDUCING MACH	915 6858 19	<u>0</u> 1	999,02-02 13:3	33 #790 P. 0 2/02
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JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

February 2, 1999

CERTIFIED MAIL RETURN RECEIFT REQUESTED

Marbob Energy Corporation Suite 103 324 West Main Street Artesia, New Mexico 88211

Attention: Raye P. Miller

Dear Sirs:

Pogo Producing Company has filed an application with the New Mexico Oil Conservation Division requesting administrative approval of an unorthodox oil well location for the following well:

Pure Gold "B" Fed. Well No. 20 1260 feet FSL and 250 feet FEL SEXSEX §20, Township 23 South, Range 31 East, NMPM Eddy County, New Mexico

A copy of the application is enclosed. If you object to the location, you must notify the Division in writing by February 22, 1999. The Division's address is 2040 South Pacheco Street, Santa Fe, New Mexico 87505 (Attention: Michael E. Stogner).

Very truly yours,

James Bruce

Attorney for Pogo Producing Company



Page: 1 Document Name: untitled

CMD :
OG5SECT

ONGARD

INQUIRE LAND BY SECTION

02/04/99 16:49:53

OGOMES -TPJK

PAGE NO: 1

Sec : 20 Twp : 23S Rng : 31E Section Type : NORMAL

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Date: 2/4/99 Time: 04:52:11 PM

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PF07 BKWD

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02/04/99 16:50:14

OG6 I WCM

INOUIRE WELL COMPLETIONS

OGOMES -TPJK

Pool Idn : 53815 SAND DUNES; DELAWARE, WEST

OGRID Idn : 17891 POGO PRODUCING CO Prop Idn : 17241 PURE GOLD B FEDERAL

Well No : 004 GL Elevation: 99999

U/L Sec Township Range North/South East/West Prop/Act(P/A)

B.H. Locn : P 20 23S 31E FTG 999 F S FTG 999 F E P

Lot Identifier:

Dedicated Acre: 40.00

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

Date: 2/4/99 Time: 04:52:32 PM