



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

New Mexico State Office
1474 Rodeo Road
P. O. Box 27115
Santa Fe, New Mexico 87502-0115
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IN REPLY REFER TO:
3100 (NM930 REW)

OCT 6 1999

CERTIFIED - RETURN RECEIPT REQUESTED

New Mexico Oil Conservation Division
2040 Pacheco Street
Santa Fe, NM 87505

Re: Case 12253, Application of Burlington Resources Oil and Gas Company for an Unorthodox Gas Well Location and a Non-Standard Gas Proration Unit, San Juan County, New Mexico

Gentlemen:

Please consider this a formal protest to the subject application pending before the New Mexico Oil Conservation Division (NMOCD). Barring modification of the proposed proration unit, we believe the correlative rights of Federal Lease adjacent to the proposed well will be damaged if the application is approved as submitted.

Burlington Resources Oil and Gas Company (Burlington) has requested a non-standard gas proration unit consisting of four quarter-quarters lying in four separate sections. The well location is also non-standard and lies very close to the northeast corner of the proposed proration unit. The combination of these two non-standard activities is to place the well immediately adjacent to a Federal lease (SE1/4SW1/4, sec. 17, T.29., R.11W.). The Federal lease covering those, and other lands, is our NMNM0019405 which is also held by Burlington. If Burlington's proposed well (McDaniel Well No. 1-R) is completed as a successful gas producer, it is our opinion that lease NMNM0019405 will be subject to drainage. If so, we would require Burlington to protect the lease from drainage. Burlington would have the option to drill a protective well, pay compensatory royalty or relinquish the all or a portion of the lease.

We ask that NMOCD or Burlington modify the proration unit to include the SE1/4SW1/4 of section 17, in order to protect the correlative rights of the nearby lessees and avoid this

situation from occurring. In the alternative, we ask that Burlington's application be denied.

Sincerely,

A handwritten signature in black ink, appearing to read "S.A. Jordan". The signature is written in a cursive style with some loops and flourishes.

Stephen A. Jordan
Acting Deputy State Director
Division of Resource,
Planning, Use and Protection