

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL PICHARDSON
Governor
Joan M Prukop
Cabir elSecretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

June 5, 2007

JUN 18 2007 OCD-ARTL

FOG Resources, Inc. c'o Holland & Hart, LLP P.O. Box 2208 Santa Fe, New Mexico 87504-2208

Attn: Ms. Ocean Munds-Dry, Attorney

Administrative Order SD-200717

RE: Simultaneous Dedication of a Gas Spacing
Unit Comprising the S/2 of Irregular
Section 2, T-16 South, R-24 East, NMPM, Eddy County,
Undesignated West Cottonwood Creek-Wolfcamp Gas Pool (Gas - 75260)

Existing horizontal well:

Gila C 2 Fee Com Well No. 1H (API No. 30-015-35567) Surface Location: 2392' FSL & 288' FEL, Unit I Bottomhole Location: 1880' FSL & 660' FWL, Unit L

Proposed horizontal well:

Gila C 2 Fed Com Well No. 2H (**API No. 30-015-35185**) Surface Location: 504' FSL & 196' FEL, Unit P Bottomhole Location: 760' FSL & 660' FWL, Unit M

Dear Ms Munds-Dry:

Reference is made to the following:

(a) your application on behalf of EOG Resources, Inc. ("EOG") (administrative application reference No. pCLP0715535591) that was submitted to the New Mexico Oil Conservation Division ("Division") in Santa Fe, New Mexico on May 31, 2007; and the Division's records pertinent to EOG's request.

The West Cottonwood Creek-Wolfcamp Gas Pool is currently governed by Division Rule 19.15.3.104(C) which requires standard 320-acre gas spacing and proration units with wells to be located no closer than 660 feet to the outer boundary of the quarter section on which the well is

located and no closer than 10 feet to any quarter-quarter section line or subdivision inner boundary. These rules further authorize the drilling of an infill well on a standard 320-acre unit provided that the infill well is not located within the same quarter section as the parent well. Because both the proposed horizontal well and the existing horizontal well will be completed within both quarter sections of this 320-acre unit, Division approval for simultaneous dedication is required.

Your application on behalf of EOG has been duly filed under the provisions of Division Rules 19.15.3.104.D(3) and 19.15.14.1210.A.

The data presented with your application demonstrates that the horizontal (producing) portion of the wellbores will be fully contained within the "producing area", as this term is defined by Division Rule 19.15.3.111.

It is our understanding that EOG has proposed the simultaneous dedication of this unit to the above-described wells for geologic reasons, in order to prevent waste and maximize production from this unit.

The applicant stated that all offset acreage is operated by EOG, and that the interest ownership between the subject proration unit and the affected offset acreage is common throughout. Consequently, the applicant is not required, and did not provide notice of this application to any party.

Pursuant to the authority granted to the Division by Rule 19.15.3.104.D(3), the above-described simultaneous dedication is hereby approved.

Sincerely,

Mark E. Fesmire, P.E.

Director

MEF/drc

cc: OCD – Artesia