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December 5, 1997

Oil Conservation Division 811 South First Street Artesia, New Mexico 88210

Attention: Mr. Tim Gum

RE: Unorthodox Well Location

Dear Mr. Gum:

Marbob Energy Corporation respectfully requests an administrative approval of the following unorthodox locations pursuant to Order No. R-7900-B:

Burch Keely Unit #280 660 feet from the North line 1345 feet from the East line Section 25, Township 17 South, Range 29 East Eddy County, New Mexico

Burch Keely Unit #282 2378 feet from the South line 290 feet from the West line Section 19, Township 17 South, Range 30 East Eddy County, New Mexico Burch Keely Unit #281
660 feet from the South line
1295 feet from the West line
Section 24, Township 17 South,
Range 29 East
Eddy County, New Mexico

Burch Keely Unit #284 660 feet from the North line 2615 feet from the West line Section 25, Township 17 South, Range 29 East Eddy County, New Mexico

These wells may be completed in the upper 500 feet of the Yeso, the Grayburg, the San Andres, and or the Seven Rivers Formation in the Grayburg Jackson Pool.

Attached to the applications are the following Exhibits:

- Application for Permit to Drill filed with the Bureau of Land A. Management (Exhibit A).
- B. Oil Conservation Division Form C-102 which shows the location and all other wells within the quarter-quarter section (Exhibit B).

Well number 280 will be 4620 feet from the unit boundary and 25 feet from the interior quarter quarter line; well number 281 will be 4798 feet from the unit boundary and 25 feet from the interior quarter quarter line; well number 282 will be 4990 feet from the unit boundary and 262 feet from the interior quarter quarter line; and well number 284 will be 4620 feet from the unit boundary and 25 feet from the interior quarter quarter line.

If this unorthodox location meets with your approval, please sign below. Thank you for your help.

Sincerely,

Rave Miller

Attorney-in-Fact

Raye Miller

RM/mm Attachments

Approved this 17 day of 7eb 1997.

By: Jen W. Sun

By:

Oil Conservation Division

Artesia Office