



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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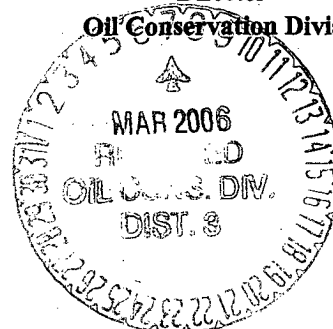
Director

Oil Conservation Division

March 2, 2006

**XTO Energy, Inc.**  
**810 Houston Street**  
**Fort Worth, Texas 76102-6298**

**Attention: George A. Cox**



**Re:** Administrative application of XTO Energy, Inc. (**application reference No. pTDS0-603852665**) for an unorthodox oil well location in the Angels Peak-Gallup Associated Pool (**2170**) for your J. C. Gordon "D" Well No. 2-F (**API No. 30-045-33444**) to be drilled 2330 feet from the North line and 1575 feet from the West line (F) of Section 22, Township 27 North, Range 10 West, NMPM, San Juan County, New Mexico.

Dear Mr. Cox:

In reviewing the Division's records in conjunction with your application, I find conflicting information within these records that affects your request. For XTO's J. C. Gordon "D" Well No. 2-E (**API No. 30-045-24100**), located 1120 feet from the South line and 790 feet from the West line (Unit M) of Section 22, is the Gallup completion classified "oil" or "gas." The Division's computerized ONGARD information shows the Gallup interval has 320 acres comprising the W/2 of Section 22 dedicated to the well, while the Form C-102 on this well for the Gallup interval shows an unintelligible 80-acre spacing unit. Is the Gallup production from the J. C. Gordon "D" Well No. 2-E "gas" or "oil"; is spacing "320 acres" or "80 acres"? If "oil," what is the orientation of the 80-acre unit a S/2 SW/4 lay-down or stand-up W/2 SW/4?

Sincerely

Michael E. Stogner  
Engineer

cc: New Mexico Oil Conservation Division – Aztec  
U. S. Bureau of Land Management - Farmington  
James Bruce, Legal Counsel for XTO Energy, Inc. – Santa Fe