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	Type Name	Signature		Title	Date

jamesbruceaol.com e-mail Address .

JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

April 30, 2004

Via fax and U.S. Mail

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Stogner:

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

Well:	Paladin 18 Fed. Well No. 1
Location:	660 feel FNL & 2500 feet FWL
Well Unit:	W% of Section 18, Township 26 South, Range 30
	East, N.M.P.M., Eddy County, New Mexico

The well will be drilled to a depth sufficient to test the Wolfcamp formation (Undesignated Southwest Ross Draw-Wolfcamp Gas Pool). A Form C-102 for the well has not yet been prepared, but will be filed when prepared.

The application is based on geology in the Wolfcamp formation. Attached as Exhibit A is an isopach map of the Wolfcamp formation, together with a geological write-up. The unorthodox location is required in order for the well to penetrate the thickest part of the Wolfcamp feature.

Attached as Exhibit B is a land plat. The acreage affected by the location (the E% of Section 18 and the S% of Section 7) are covered by federal lease NM 31649, owned by Yates Petroleum Corporation, et al. The offset owners are being notified of this application by certified mail. <u>See</u> Exhibit C.

Please call me if you need anything further on this matter.

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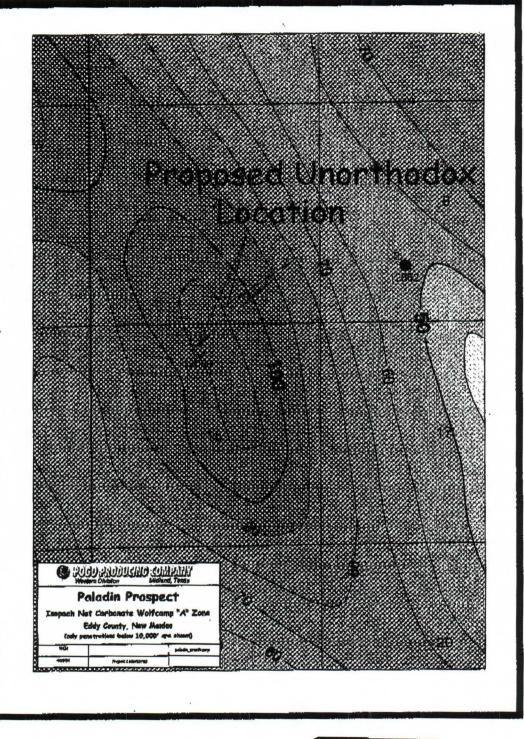
Very truly yours,

Janés

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Attorney for Pogo Producing Company

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Pogo Producing Company Paladia 18 Fed #1

Application for Unorthodox Location due to Geologic Reasons

- 1. Pogo requests approval for the proposed Paladin 18 Fed #1 well at an unorthodox location due to geological considerations.
- 2. The proposed well has a planned total depth of 12,000', which will test prospective gas producing targets in the Wolfcamp Carbonate and oil zones in the Delaware sand.
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JAMES BRUCE

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jameshrue@aol.com

April 30, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Yates Petroleum Corporation Yates Drilling Company Abo Petroleum Corporation MYCO Industries, Inc. 105 South Fourth Street Artesia, New Mexico 88210

Gentlemen:

Enclosed is a copy of an application for an unorthodox gas well location, filed with the New Mexico Oil Conservation Division by Pogo Producing Company, regarding a well in the W% of Section 18, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. If you object to the application, you must file a written objection with the Division by May 20, 2004 (1220 South St. Francis Drive, Santa Fe, New Mexico 87505). Failure to object will preclude you from contesting this matter at a later date.

Very truly yours,

Actorney for Pogo Producing Company



5-	4-84 N SUSPENSE	Stogner LOGGED IN 5-4-04 TYPE NSL APPIND IN COMPANY
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	N	ABOVE THIS LINE FOR DIVISION USE ONLY TEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 DIVISION
. <u> </u>	/	ADMINISTRATIVE APPLICATION CHECKLIST
٦	THIS CHECKLIST IS MAI	NDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
Appli	DHC-Down [PC-Poo [dard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] hole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] of Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] fied Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
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[2]	NOTIFICATI [A]	ON REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners
	[B]	Offset Operators, Leaseholders or Surface Owner
	[C]	Application is One Which Requires Published Legal Notice
	[D]	Notification and/or Concurrent Approval by BLM or SLO
	[E]	For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F]	Waivers are Attached
[3]		CURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE TION INDICATED ABOVE.
	oval is accurate an cation until the req	TON: I hereby certify that the information submitted with this application for administrative d complete to the best of my knowledge. I also understand that no action will be taken on this uired information and notifications are submitted to the Division. Statement must be completed by an individual with managerial and/or supervisory capacity.

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Note: State James Bruce	ment must be completed by an i	ndividual with mai	nagerial and/or supervisory capacity. Attorney for Applicant	4/30/04
Print or Type Name	Signature		Title	Date
			jamesbruc@aol.com	
Λ	. 1		e-mail Address	
This record wa	fed			

JAMES BRUCE ATTORNEY AT LAW

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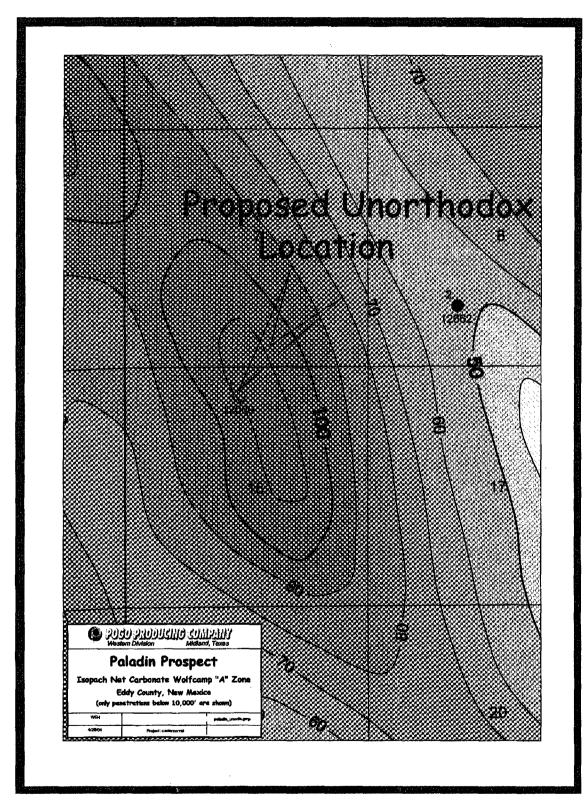
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Attorney for Pogo Producing Company





Pogo Producing Company Paladin 18 Fed #1

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Actorney for Pogo Producing Company



county Eddy Pool Brushy Draw- Wolfcamp Gas 72897 26 South Range 29 East NMPM TOWNSHIP 2 1 5 6 4 8 9 --- 10 --- 11 -7 -12 ---18 17 -- 16 15 -14 --13 * -19-- 20 -21-22 -23-2 5 -- 30 -- 29 -- 28 ---27-+ - 26 -- 31-- 32 33 -- 34 -35 -36 Description: 1/2 Sec. 24 (R-7131, 11-30-82) Ext. 544 Sec. 24, 4/2 Sec. 25 (R-11706, 1-9-02)

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