

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Joanna Prukop
Cabinet Secretary

August 17, 2004

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

Apache Corporation Two Warren Place – Suite 1500 6120 South Yale Tulsa, Oklahoma 74136-4224

Attention:

Kara Coday

RE: NMOCD Correspondence Reference No. SD-04-06: Paddock Pool (49210) development within Apache Corporation's existing standard 40-acre oil spacing and proration unit comprising the SE/4 SW/4 (Unit N) of Section 22, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico.

Dear Ms. Coday:

Reference is made to the following: (i) your letter dated July 20, 2004 (*Division administrative reference No. pSEM0-420927303*); and (ii) the records of the New Mexico Oil Conservation Division ("Division").

The rules currently governing spacing, well locations, gas/oil ratio limitation, and allowables for the Paddock Pool include, but not necessarily limited to:

- (a) Division Order No. R-10026, issued in Case No. 10830 on November 30, 1993, as amended by Division Order No. R-10026-A on March 3, 1995; and
- (b) Division Rules 104.B and 505.A.

It is the Division's understanding that oil and casinghead gas production attributed to the Paddock Pool within the above-described 40-acre unit is to be simultaneously dedicated to the following two Apache Corporation's wells:

- (1) Turner Well No. 11 (API No. 30-025-06753), located at a standard oil well location 915 feet from the South line and 1650 feet from the West line (Unit N) of Section 22; and
- (2) Turner Well No. 18 (API No. 30-025-34388), located at a standard oil well location 330 feet from the South line and 2310 feet from the West line (Unit N) of Section 22.

Sincerely,

Michael E. Stogner Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division – Hobbs

James Bruce, Legal Counsel for Apache Corporation - Santa Fe