NSL 6/5/00



May 8, 2000

Oil Conservation Division State of New Mexico 2040 South Pacheco Santa Fe, New Mexico 87505

Attn: Mr. Michael E. Stogner

Chief Hearing Officer/Engineer

RE: APPLICATION FOR ADMINSTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION

SAN JUAN 29-6 UNIT #94M WELL

W/2 SECTION 16-29N-6W

RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Stogner:

Please find attached, the captioned application, which was returned to our office along with your letter of April 24, 2000. It is my understanding that Mr. Charlie Perrin of the Aztec District Office has met with our Drilling Supervisor, Richard Allred at the location for the captioned well and determined that it will not be possible to move the location to an orthodox location, due to topographical considerations.

Even though our initial intent was to move the location, we hereby re-submit our application for approval of an unorthodox location for the San Juan 29-6 Unit #94M Well. We respectfully ask that along with the original information provided, you please take into account the topographic considerations, which have been concurred with by Mr. Perrin.

We thank you in advance for your cooperation in working with us on this matter.

Very Truly Yours,

S. Scott Prather, CPI Senior Landman San Juan Area (505) 599-3410

cc: J. L Mathis – C40453

Frank Chavez - OCD, Aztec

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

April 24, 2000

Phillips Petroleum Company 5525 Highway 64 - NBU 3004 Farmington, New Mexico 87401

Attention:

S. Scott Prather

Re:

Administrative applications of Phillips Petroleum Company for exceptions to the well location requirements provided within the "Special Rules and Regulations for the Basin-Dakota (Gas) Pool", as promulgated by Division Order No. R-10987, as amended, for the San Juan "29-6" Unit Wells No. 81-M, 85-M, 91-M, 94-M, 100-M, and 101-M and San Juan "30-5" Unit No. 48-M.

Dear Mr. Prather:

From conversations with the Aztec district office of the Division, it is my understanding that the above-described seven proposed locations are to be moved and re-staked at standard locations. Therefore, I am returning these applications to you at this time.

Thank you for your cooperation in this matter.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division - Aztec

Mr. Steve Salzman - U. S. Bureau of Land Management, Santa Fe

Mr. Neel McBride - U. S. Bureau of Land Management, Farmington

U. S. Forest Service - Bloomfield

Ms. Kathy Valdes, NMOCD - Santa Fe

LOGGED BY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -2040 South Pacheco, Santa Fe, NM 87505



TIGYM

ADMINISTRATIVE APPLICATION COVERSHEET

—- НТ	S COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS
ilaaA	WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE cation Acronyms:
	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF APPLICATION - Check Those Which Apply for [A] [A] Location - Spacing Unit - Directional Drilling NSL INSP IDD ISD MAR 2 8 2000
	Check One Only for [B] or [C] [B] Commingling - Storage - Measurement DHC DCTB PLC DC DOLS DOLM
	[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD IPI EOR PPR
[2]	NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply [A] 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 U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E]
	[F] Waivers are Attached
[3]	INFORMATION / DATA SUBMITTED IS COMPLETE - Certification

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data (including API numbers, pool codes, etc.), pertinent information and any required notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.



March 23, 2000

Oil Conservation Division State of New Mexico 2040 South Pacheco Santa Fe, New Mexico

Attn: Mr. Michael E. Stogner

Chief Hearing Officer/Engineer

RE:

APPLICATION FOR ADMINSTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION

SAN JUAN 29-6 UNIT #94M WELL

W/2 SECTION 16-29N-6W

RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Stogner:

Phillips Petroleum Company (Phillips) as Operator of the captioned well, respectfully requests administrative approval of an Unorthodox Well Location for said well.

Phillips proposes to drill the San Juan 29-6 Unit #94M well at a location of 2370' FNL & 1845' FWL of Section 16-29N-6W, Rio Arriba County, New Mexico. This will be a commingled well located in the Basin Dakota and Blanco Mesaverde Pools and will have the W/2 of Section 16 designated as the drillblock for the Mesaverde and as the drillblock for the Dakota. This is an orthodox location for the Mesaverde (as per Order No. R-10987-A) and is an 80 acre infill well for the Mesaverde Pool, however it is not an orthodox location for the Dakota Pool, as currently established.

In the San Juan 29-6 Unit the Mesaverde has been developed on the optional 160 acre basis. Optimal spacing of this 80 acre Mesaverde infill well for the reservoir drainage purposes was the primary reason this location was selected. As demonstrated in the Exhibits presented in conjunction with Case No. 12136 (Phillips' application for downhole commingling) it is unlikely that a stand-alone Dakota well can be drilled on an economic basis. The most viable alternative to recover Dakota reserves is to drill Dakota/Mesaverde commingled wells. Utilization of 80 acre Mesaverde infill wells accomplishes this, however it precludes drilling the well at a standard Dakota location. The drilling of commingled wells also provides the added benefit of less surface disturbance.

For your benefit in reviewing this request, we are providing the following:

- 1. Form C-102
- 2. A topographical plat of the area
- 3. A nine section plat exhibiting offset operators & affected owner list
- 4. A plat of this well's location in relation to existing and proposed Mesaverde wells
- 5. Copies of Exhibits presented in Case 12136, (Order No. 11187 issued)

MR. MICHAEL STOGNER
APPLICATION FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION
SAN JUAN 29-6 UNIT #94M WELL
MARCH 21, 2000
PAGE 2

This drillblock is located within the confines of the San Juan 29-6 Unit. Phillips is the Operator of this unit. The ownership of Dakota offset spacing units to the North, Northwest, West, Southwest and South is different from the Dakota spacing unit for this well and per Rule 104.F notice of this application is required to be sent to all affected persons. All affected persons are being furnished with 3 copies of this application by certified mail and are advised that they must submit objections to this application in writing within twenty (20) days. They may alternately forward an executed waiver to your office, retain one copy for their records and return one copy to our office.

We appreciate and thank you for your attention to this request and should you need additional information or clarification on this matter, please do not hesitate to contact the undersigned.

	Very truly yours,	/	
<i>(</i>	S. Scott Prather, CPL Senior Landman San Juan Area (505) 599-3410		
	cc: J. L. Mathis (r)C40453 Frank Chavez-OCD, Aztec Offset Owners		
	a Dakota unorthodox location fo	_ hereby waives objection to Phillips Petroleum Company or the San Juan 29-6 Unit #94M well as proposed above.	's application for
	By:	Date:	

OFFSET AFFECTED OWNERS LIST

BURLINGTON RESOURCES OIL & GAS COMPANY Z 464 536 965

VASTAR RESOURCES, INC. Z 464 536 974

CONOCO, INC. Z 464 536 975

Fo Box 1980, Hobbs, NM 88241-1980 District II 811 S. 1st Street, Artesia, NM 88210-2834 District III 1000 Rio Brazos Rd., Aztoc, NM 87410 District IV 2040 South Pacheco, Santa Fe, NM 87505

hergy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION

State of New Mexico

2040 South Pacheco Santa Fe, NM 87505

Form C-Revised October 18, 1 Instructions on t Submit to Appropriate District Of State Lease - 6 Co Fee Lease - 5 Co

■ AMENDED REPOR

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²³ I hereby certifof my knowledge	fy that the in	formation (given above is to	ue and comp	plete to the best				CONSERVAT	ION DIVI	SION	
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quth First, Artesia, NM 20210

³ Rio Bruzos Rd., Astec, NM 87410

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0 South Pacheco, Santa Fe, NM 87505

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

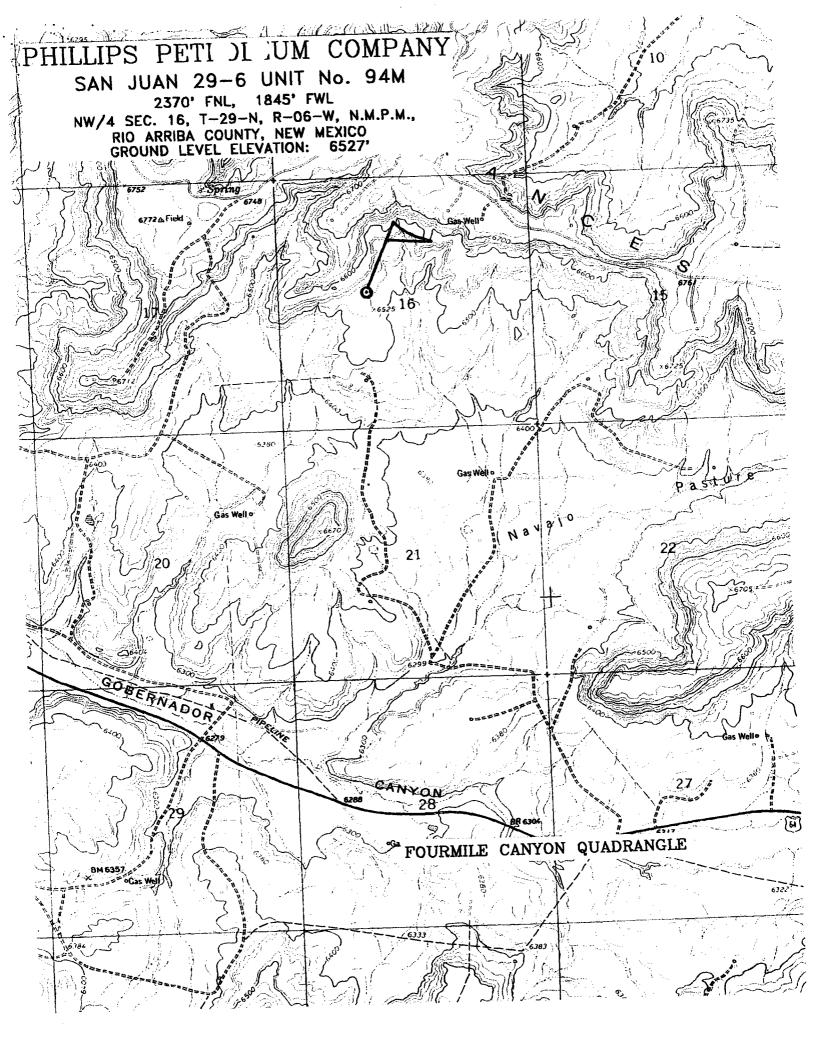
Energy, Minerals & Natural Resources to parties....

Instructions on buck Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

7505

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PLAT OF OFFSET OPERATORS TO W/2 SECTION 16-29N-6W, RIO ARRIBA COUNTY, NEW MEXICO

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	Phillips Petroleum Company (100%)	Phillips Petroleum Company (100%)	Phillips Petroleum Company (100%)	
	17 Phillips	#94M	16	15
9N	Petroleum Company (Burlington Resources, etal)		Phillips Petroleum Company	
	20		21	22
	Phillips Petroleum Company (Burlington Resources, etal)	Phillips Petroleum Company (Burlington Resources)	Phillips Petroleum Company	

29N

OFFSET AFFECTED OWNERS LIST

Burlington Resources Oil & Gas Company Vastar Resources, Inc. Conoco, Inc.

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1 11	4A 7703 ¤ 1069 161	71 6304 pt 2155 182	38A 7808 [‡] 94M 1566 325 ●	37 6004 2980 173	35A 7808 ¤ 912 210	6108 6108 2193 43 43 7807	2A 7603 † 1843 358	34 5709 \$\phi\$ 4505 173
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San Juan 29-6 Unit (Mesaverde)

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R-6-W

MESAMERDE Kmw — Koh CLIFTHOUSE
Km MEJEFEE
Kml POINT LOOKOUT

Mesaverde Participating Area
37th expansion Eff. 11/1/62

PHILLIPS PETR. CO.

SAN JUAN 29-6 UNIT

March 4, 1999

J. Hopkins

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R-6-W

M DAKOTA Kd

Dakota Participating Area
10th expansion Eff. 7/1/66

PHILLIPS PETR. CO.

SAN JUAN 29-6 UNIT RIO ARRIBA CO. NM

March 4, 1999

J. Hopkins

T 29 N

DRILLING AND COMPLETION COSTS CAPITAL EXPENSES (M\$)

MESAVERDE

DAKOTA

SINGLE COMPLETION

	TANGIBLE	INTANGIBLE	TOTAL		TANGIBLE	INTANGIBLE	TOTAL
DRILL & COMPLETE	105.2	339.4	444.6	DRILL & COMPLETE	119.1	362.2	481.3
FACILITIES	22.6	16.4	39.0	FACILITIES	22.6	16.4	39.0
TOTAL	127.8	355.8	483.6	TOTAL	141.7	378.6	520.3

Two Singles (Dakota + Mesaverde) 1003.9

DUAL COMPLETION

	TANGIBLE	INTANGIBLE	TOTAL		TANGIBLE	INTANGIBLE	TOTAL
DRILL & COMPLETE	74.5	330.3	404.8	DRILL & COMPLETE	80.6	362.0	442.
FACILITIES	22.6	16.4	39.0	FACILITIES	22.6	16.4	39.(
TOTAL	97.1	346.7	443.8	TOTAL	103.2	378.4	481.

Dually Completed (Dakota + Mesaverde) 925.4

COMMINGLE COMPLETION

	TANGIBLE	INTANGIBLE	TOTAL		TANGIBLE	INTANGIBLE	TOTAL
DRILL & COMPLETE	51.7	284.5	336.2	DRILL & COMPLETE	69.7	280.3	350.
FACILITIES	11.3	8.2	19.5	FACILITIES	11.3	8.2	19.
TOTAL	63.0	292.7	355.7	TOTAL	81.0	288.5	369.

Commingled Completion (Dakota + Mesaverde) 725.2

MESAVERDE OPERATING COSTS (\$/YR)

	SINGLE COMPLETION	DUAL COMPLETION	COMMINGLE COMPLETION
SAN JUAN 29-6 UNIT	7350	6620	5510
SAN JUAN 31-6 UNIT	5540	4990	4160
SAN JUAN 32-7 UNIT	6900	6210	5180
SAN JUAN 32-8 UNIT	6220	5600	4670

DAKOTA OPERATING COSTS (\$/YR)

	SINGLE COMPLETION	DUAL COMPLETION	COMMINGLE COMPLETION
SAN JUAN 29-6 UNIT	5560	5000	4170
SAN JUAN 31-6 UNIT	5560	5000	4170
SAN JUAN 32-7 UNIT	5500	4950	4130
SAN JUAN 32-8 UNIT	5025	4525	3770

