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

March 29, 2000

Conoco, Inc. 10 Desta Drive – 100W Midland, Texas 79705-4500

Attention:

Kay Maddox

Re: Administrative application of Conoco, Inc. dated March 27, 2000 requesting an exception to Rule 4 of the "Temporary Special Pool Rules for the North Hardy-Strawn Pool," as promulgated by Division Order No. R-11221, issued in Case No. 12182 upon the application of Conoco, Inc. and dated July 12, 1999, in order to drill its proposed Meyer "B-31" Well No. 5 (API No. 30-025-34960) at an unorthodox oil well location 2310 feet from the South line (which is 50 % closer to the north line of this well's proposed unit then allowed) and 1850 feet from the West line (Unit K) of Section 31, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico. Lots 3 and 4 and the E/2 SW/4 (SW/4 equivalent of Section 31, being a standard 160.10-acre oil spacing and proration unit within the governing limits of the North Hardy-Strawn Pool, is to be dedicated to this well.

Dear Ms. Maddox:

Due to the lack of supporting geological data, your application is hereby denied.

Sincerely

Michael E. Stogner Chief Hearing Officer/Engineer

cc:

New Mexico Oil Conservation Division - Hobbs

W. Thomas Kellahin, Legal Counsel for Conoco, Inc. - Santa Fe

Ms. Lori Wrotenbery, Director - NMOCD, Santa Fe

Ms. Kathy Valdes, NMOCD - Santa Fe

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

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ADMINISTRATIVE APPLICATION COVERSHEET
THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS
pplication 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]
TYPE OF APPLICATION - Check Those Which Apply for [A] [A] Location - Spacing Unit - Directional Drilling NSL NSP DD DSD
Check One Only for [B] and [C] [B] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM
Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD IPI EOR PPR
NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply [A] Working, Royalty or Overriding Royalty Interest Owners
[B]
[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] For all of the above, Proof of Notification or Publication is Attached, and/or,
[F] Waivers are Attached
[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding
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, information or notification is cause to have the application package returned with no action taken

Kay Maddox Print or Type Name

3/28/2000

Date



Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

March 27, 2000

Mr. Michael Stogner
New Mexico Oil Conservation Division
2040 Pacheco
Santa Fe. NM 87504

RE:

Application For Unorthodox Location North Hardy Strawn Pool (96893)

Meyer B-31 #5 New Drill Section 31, T-20-S, R-38-E, K 2310' FSL & 1850' FWL API # 30-025-34960 Lea County, New Mexico

Dear Mr. Stogner,

Conoco, Inc respectfully requests your approval of this administrative application for a non-standard location order for the above list well.

The North Hardy Strawn pool rules state that a standard location is 660' from the outer boundary of the 160 acre proration unit. The Meyer B-31 #5 is only 330' from the north line of the 160-acre proration unit. The well is staked at an unorthodox location. Please reference attached C-102 plat.

The Strawn play in this area is based on a 3-D seismic interpretation that has meticulously defined the thickest porosity zones. As evidenced by drilling and completing the Hardy State 36 #26, #21, #1, SEMU # 134 and the unsuccessful Strawn completion of the # 135 it is evident that proximity to thick porosity zones is imperative to the location of new drilling prospects. Based on log correlations, stratigraphy is also a major component of porosity development. The stratigraphy coordinated with the structural trend defines a very small area in which to locate the well. Movement as little as 200' could result in a net loss of porosity resulting in a ten fold reduction in production. Conoco, Inc feels that the placement of the above listed unorthodox well will not compromise the validity of the scientific data that resulted in the proposal to drill the well. Scientific data i.e. seismic line and structural map encompassing this area was submitted to the New Mexico Oil Conservation, May 1999 during the hearing to establish the North Hardy Strawn pool. The data submitted substantiates Conoco's belief that a standard location for this well would result in an unsuccessful Strawn well completion. Conoco, Inc believes that the proposed unorthodox location is strategically staked where the good porosity development of the Strawn reservoir lies on trend with structure.

Meyer B31 #5 - See Exhibit 1

This location was chosen as a southeastern extension of the productive zone within the Strawn in the Hardy 36 State #26 well. The seismic line (Exhibit 1) is located in a north south orientation through the proposed location. The Strawn section in this area thins to the southeast onto the Brunson High. The seismic line shows the Strawn to Devonian section (yellow to purple) thins both to the north and south. Based on other wells in the Strawn, the discontinuous nature of the seismic peak (blue) within the Strawn section at about 1080 milliseconds (indicated by the black arrows) is the area that porosity is developed. This location was chosen because it would be: 1) high on structure, 2) encounter a thick section of Strawn and 3) encounter the Strawn where it appears discontinuous. For this well to be staked standard it would have to be moved 330' to the south. The seismic line shows that directly to the right (south) of the staked non-standard location there is an obvious dip in the yellow Strawn marker line. Conoco believes that the Strawn would come in low if drilled at the standard location.

Please note that in both cases Conoco Inc. will only be encroaching 330' interior to their offsetting lease. Conoco is the lessor of the NW $\frac{1}{2}$ (LC 031696) of the SW $\frac{1}{2}$ and the N/E $\frac{1}{2}$ (NM -2511) of the SW $\frac{1}{2}$ encompassing 80 acres in the 160 acre proration unit in Section 31. Chevron is the lessor of the 80 acres encompassing the S $\frac{1}{2}$ of the SW $\frac{1}{2}$ of the 160 acre proration unit. Chevron and Conoco, Inc. are partners on this well and a communitization agreement is in process. There is no notification required to an offset operator.

Conoco, Inc. respectfully requests that a non-standard location order be granted for the Meyer B-31 #5. If any additional information is required please call me at (915) 686-5798.

Sincerely

Kay Maddox - Conoco, Inc.

Regulatory Agent

Cc: OCD- Hobbs BLM - Roswell DISTRICT I 1825 M. Franch Br., Sobba, MM 88240 DISTRICT II 611 South First, Artesia, NM 88210 State of New Mexico

Energy, Marrals and Natural Resources Department

Form C-102 Revised March 17, 1999

Submit to Appropriate District Office

State Lease — 4 Copies Fee Lease — 3 Copies

DISTRICT III 1000 Rio Brasos Rd., Asteo, RM 67410

2040 South Pachece, Santa Fe, XM 87605

DISTRICT IV

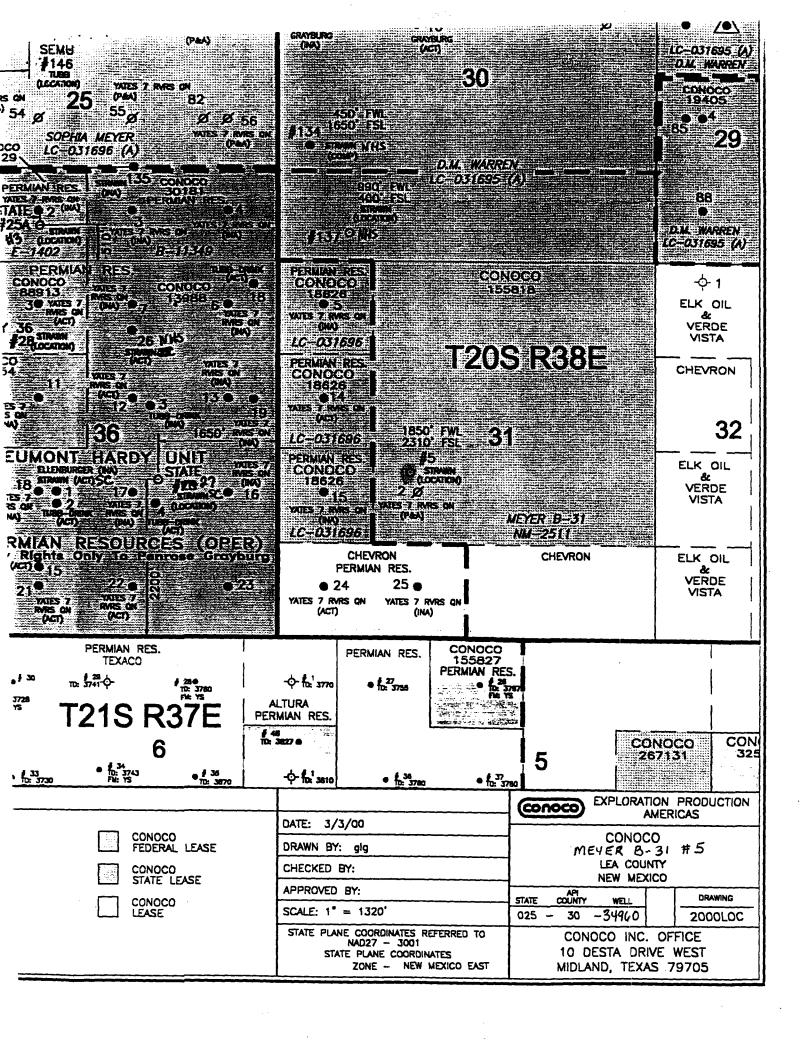
OIL CONSERVATION DIVISION

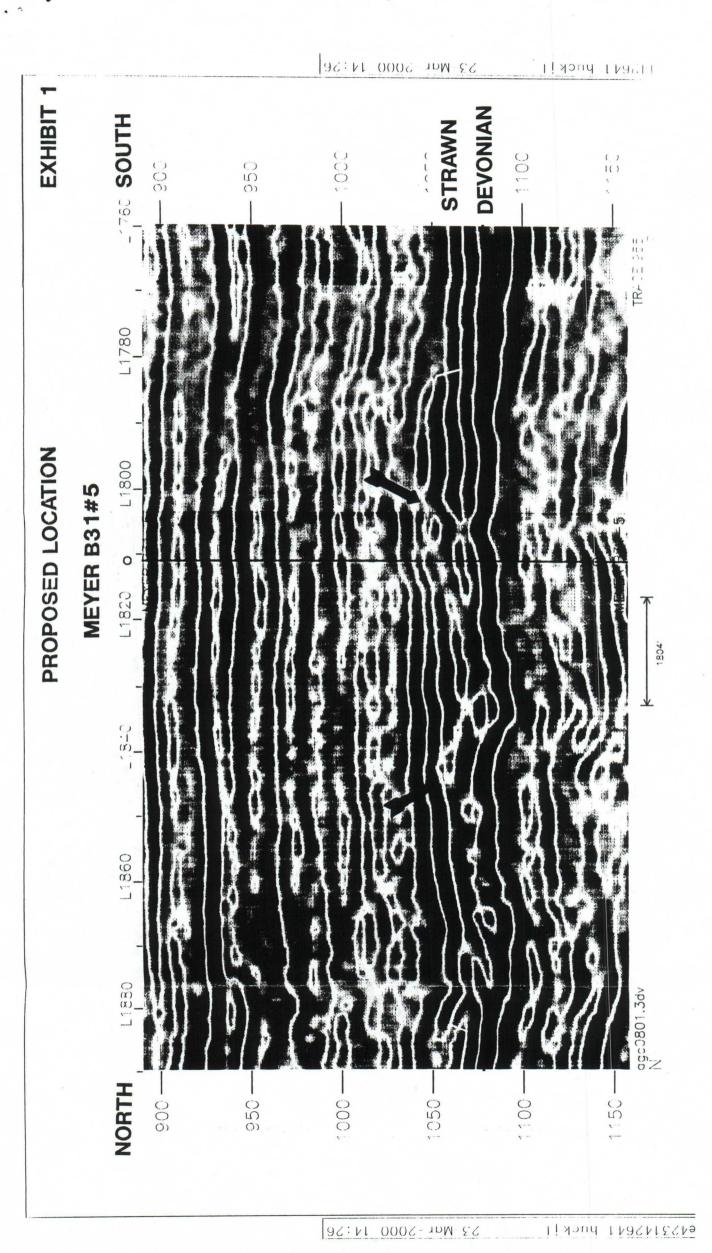
2040 South Pacheco Santa Fe, New Mexico 87505

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

	Number 25-349	ารถ		Pool Code		North Har	Pool Name dy Strawn		
Property C		Property Name MEYER B-31						Vell Nu	rwper
OGRID No	١.				Operator Name CONOCO INC			Elevation 3494'	
		-			Surface Loca	ation			
UL or lat No.	Section	Township	Range	iot idn	Feet from the	North/South line	Feet from the	East/West line	County
K	31	20 S	38 E	, 	2310	SOUTH	1850	WEST	LEA
			Bottom	Hole Lo	cation If Diffe	erent From Sur	face		
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	Rest/West line	County
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Dedicated Acres	Joint	or Infill Co	nsolidation (Code Ur	der No.				
<u> </u>	WABLE 1					JNTIL ALL INTER APPROVED BY		EN CONSOLIDA	ATED
		LAT - N32* LONG - W10 3493.0*					Signature Signature Regulf Title SURVEYO I hereby certifi on this plat we actual surveys supervison, and	21/2000 OR CERTIFICATION of that the well locate plotted from field made by me or	FION Non shown d notes of under my true and
	 	2310					Data Surveys Signatura, 16 Protessional	19 19 19 19 19 19 19 19 19 19 19 19 19 1	h







Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

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Regulatory Agent

Cc: OCD- Hobbs BLM - Roswell · · DISTRICT I 1825 M. Franch Br., Be DISTRICT II 611 South First, Artemia, NM 88210

State of New Mexico

Spergy, Minerals and Natural Resources Department

Form C-102 Sevised March 17, 1990

Submit to Appropriate District Office

State Lease - 4 Copies

DISTRICT III 1000 Rio Brazon Rd., Astec. NM 87410 DISTRICT IV

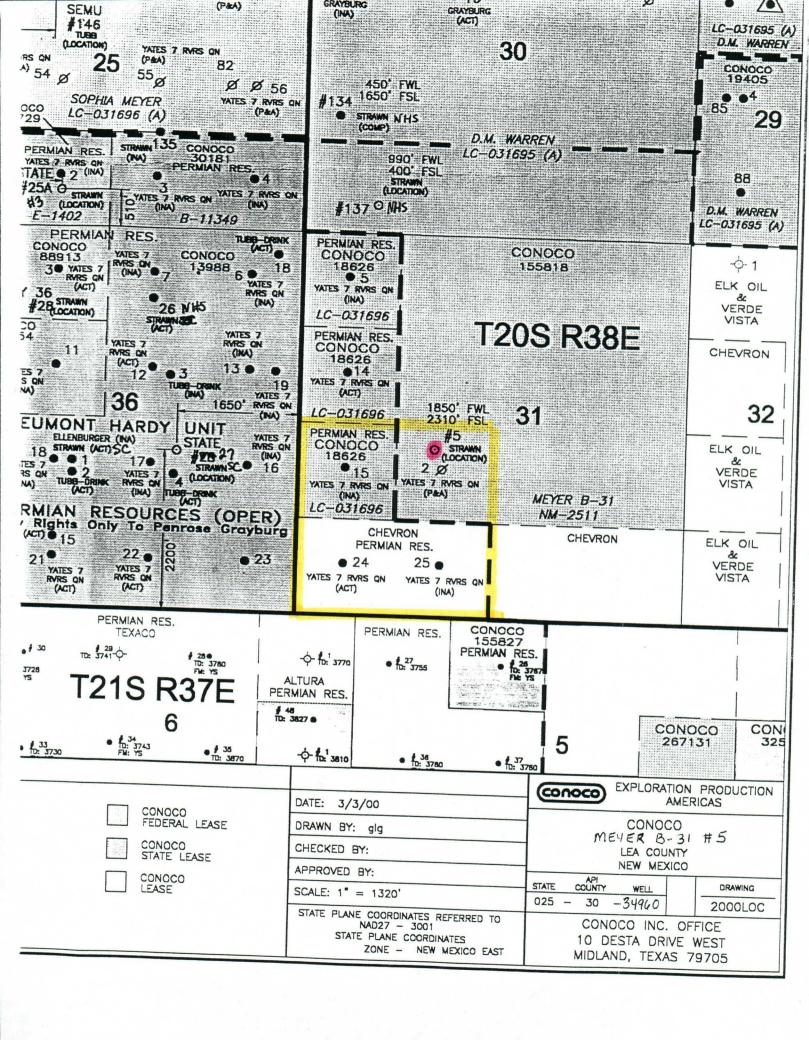
2040 South Pacheco, Santa Fe, NM 87606

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, New Mexico 87505

AMENDED REPORT

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			Bottom	Hole Lo	cation If Diffe	erent From Sur	face		·
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acre	s Joint	or Infill Co	nsolidation	Code 0	rder No.	<u> </u>		<u>l</u>	<u> </u>
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CMD : OG5SECT

ONGARD

INQUIRE LAND BY SECTION

03/29/00 16:26:49

OGOMES -TPGM

PAGE NO: 2

Sec : 31 Twp : 20S Rng : 38E Section Type : NORMAL

				
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Date: 3/29/2000 Time: 04:42:15 PM

Page: 1 Document Name: untitled

CMD :
OG5SECT

ONGARD

INQUIRE LAND BY SECTION

03/29/00 16:26:40

OGOMES -TPGM

PAGE NO: 1

Sec : 31 Twp : 20S Rng : 38E Section Type : NORMAL

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	PF07 BKWD PF08 FW	D PF09 PRINT	PF10 SDIV PF11	

Date: 3/29/2000 Time: 04:42:12 PM

03/29/00 16:27:04 ONGARD CMD :

C101-APPLICATION FOR PERMIT TO DRILL OGOMES -TPGM OG6C101

: 5073 API Well No: 30 25 34960 APD Status(A/C/P): A OGRID Idn

Opr Name, Addr: CONOCO INC Aprvl/Cncl Date : 02-07-2000

> 10 DESTA DR W MIDLAND, TX 79705

Prop Idn: 25410 MEYER B 31 Well No: 5

U/L Sec Township Range Lot Idn North/South East/West

--- --- ----- ----- ------ ------20S 38E

Surface Locn : K 31 FTG 2310 F S FTG 1850 F W OCD U/L : K API County : 25

Work typ (N/E/D/P/A) : N Well typ (O/G/M/I/S/W/C) : O Cable/Rotary (C/R) : F

Lease typ(F/S/P/N/J/U/I): F Ground Level Elevation: 3494

State Lease No: Multiple Comp (Y/N) : S

Prpsd Depth : 8150 Prpsd Frmtn : STRAWN

E0009: Enter data to modify record

PF02 PF03 EXIT PF04 GoTo PF05 PF06 CONFIRM PF08 PF09 PRINT PF10 C102 PF11 HISTORY PF12 PF01 HELP PF02

PF07

Date: 3/29/2000 Time: 04:42:36 PM

North county Lea pool South Hardy-Strawn TOWNSHIP 20 South Range 37 East NMPM 10 17 18 16 14 -13 20 21-22 19 23-24-29 28 27 30 -26-25 · 32 · - 31-- 33 -34 -35 -Description: NEW Sec. 36 (R-11183, 5-19-99)
Redesignate as North Hardy-Strawn Pool (R-11205, 6-14-99)

Sand and the Sand Married

TOWNSHIP	20 South	Range 38 East	NMPM
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Ext; SY45ec, 30, Ny45ec, 31 (R-11304,1-12-co)