

Susana Martinez Governor

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John H. Bemis Cabinet Secretary-Designate

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey
Division Director
Oil Conservation Division



July 18, 2011

Apache Corporation Attn: Mr. David Catanach 6120 S. Yale, Suite 1500 Tulsa, OK 74136

> Administrative Order NSL-6424 Administrative Application Reference No. pWVJ11-18654453

Apache Corporation OGRID 873 Turner Well No. 33 API No. 30-025-40177

Proposed Location:

Footages	Unit	Section	Township	Range.	County
1550 FSL & 2550 FEL	$\overline{\mathtt{J}}$	22	21S	37E	Lea

Proposed Unit:

Description	Acre	s Pool	Pool Code
NW/4 SE/4 Sec. 22	40	Penrose Skelly-Grayburg	50350
NW/4 SE/4 Sec. 22	40	Paddock	49210

Reference is made to your application received on July 5, 2011.

You have requested to drill or re-complete this well at an unorthodox oil well location described above in the referenced pools. This location is governed, as to both such pools, by statewide Rule 15.9.A [19.15.15.9.A NMAC], which provides for 40-acre units, with wells located at least 330 feet from a unit outer boundary. This location is less than 330 feet from a unit boundary.

Your application has been duly filed under the provisions of Division Rules 15.13 [19.15.15.13 NMAC] and 4.12.A(2) [19.15.4.12.A(2) NMAC].



It is our understanding that you are seeking this location for engineering reasons (to optimize recovery from these reservoirs) and to avoid interference with existing power lines.

It is also understood that notice to offsetting operators or owners is unnecessary due to common ownership.

Pursuant to the authority conferred by Division Rule 15.13.B, the above-described unorthodox location is hereby approved.

This approval is subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 5.9 [19.15.15.9 NMAC].

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

Sincerely,

Jami Bailey Director

JB/db

cc: New Mexico Oil Conservation Division – Hobbs New Mexico State Land Office