



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

May 19, 2005

**Southwestern Energy Production Company
2350 N. Sam Houston Parkway East - Suite 300
Houston, Texas 77032**

Telefax No. (281) 618-4757

Attention: W. Kurt Butler

Administrative Order NSL-5205

Dear Mr. Butler:

Reference is made to the following: (i) your initial application that was submitted to the New Mexico Oil Conservation Division ("Division") in Santa Fe, New Mexico on March 28, 2005 (*administrative application reference No. pMES-509137579*); (ii) your telephone conversation with Mr. Michael E. Stogner, Engineer with the Division in Santa Fe on Tuesday morning, April 12, 2005; (iii) your reply on May 18, 2005 with an amended application and the necessary data to support the your application; and (iv) the Division's records in Santa Fe, including the file in Division Case No. 13185: all concerning Southwestern Energy Production Company's ("SwEPCo") request to drill its No Bluff State Well No. 6 as an initial well within a standard 40-acre oil spacing and proration unit in the Northeast Red Lake-Glorieta-Yeso Pool (**96836**) comprising the NW/4 NW/4 (Unit D) of Section 36, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico, at an unorthodox oil well location 1125 feet from the North line and 330 feet from the West line of Section 35.

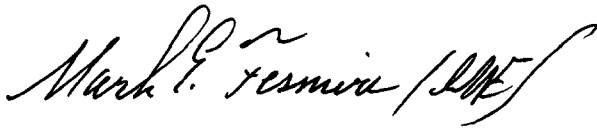
This application has been duly filed under the provisions of Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999.

It is the Division's understanding that the area comprising the W/2 NW/4 of Section 36 comprises a single state lease issued by the New Mexico State Land Office (*State Lease No. V-5512*) in which SwEPCo is the leasehold operator and all mineral interest is common.

It is further understood that SwEPCo's plan of development for the Glorieta/Yeso in this general area is with three or four wells per 40-acre unit and that this location exception is being sought for engineering, geological, and topographical reasons. The proposed well location will enable SwEPCo to develop and deplete the Glorieta/Yeso reserves within this state lease that might not otherwise be recovered.

By the authority granted me under the provision of Division Rule 104.F (2), as revised, the above-described unorthodox oil well location for SwEPCo's proposed No Bluff State Well No. 6 within the Northeast Red Lake-Glorieta-Yeso Pool is hereby approved.

Sincerely,

A handwritten signature in black ink, reading "Mark E. Fesmire" followed by a stylized flourish or set of initials.

Mark E. Fesmire, P. E.
Director

MEF/ms

cc: New Mexico Oil Conservation Division - Artesia
New Mexico State Land Office - Santa Fe
File: Case No. 13185