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ABOVE THIS LINE FOR DIVISION USE ONLY

## NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



jamesbruc@aol.com

e-mail Address

# ADMINISTRATIVE APPLICATION CHECKLIST THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE Application Acronyms: [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [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] [1] Location - Spacing Unit - Simultaneous Dedication NSL NSP V SD Check One Only for [B] or [C] Commingling - Storage - Measurement □ DHC □ CTB □ PLC □ PC □ OLS □ OLM [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery □ WFX □ PMX □ SWD □ IPI □ EOR □ PPR [D]Other: Specify\_ [2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interes Qwners [A] [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 For all of the above, Proof of Notification or Publication is Attached, and/or. [F] Waivers are Attached [3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE. [4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division. Note: Statement/must be completed by an individual with managerial and/or supervisory capacity. Attorney for Applicant James Bruce Print or Type Name Title Signature

JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (5050 982-2151 (Fax)

jamesbruc@aol.com

June 17, 2005

## Hand delivered

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Pursuant to Division Rules 104.D(2), Gruy Petroleum Management Company applies for approval of an unorthodox gas well location for the following well:

Well:

Grayburg Deep Unit Well No. 20

Location:

1640 feet FSL & 2100 feet FEL

Well unit:

S½ §19-17S-30E, Lea County, New Mexico

The well will be drilled to a depth sufficient to test the Morrow formation (Sand Tank-Morrow Gas Pool). The Atoka formation is a secondary zone (Sand Tank-Atoka Gas Pool), and applicant requests unorthodox location approval in both formations. The pools are spaced on statewide rules, with 320 acre spacing and wells to be located no closer than 660 feet to a quarter section line nor closer than 10 feet to a quarter-quarter section line. An APD, with a Form C-102 for each zone, is attached as Exhibit A.

(Applicant also intends to drill its Grayburg Deep Unit Well No. 17 in the NW¼SW¼ §19. A separate unorthodox location application will be filed for that well.)

The location is based on geologic and topographic reasons. Applicant initially proposed to drill the well at an orthodox location 1310 feet FSL and 1980 feet FEL. Attached as Exhibit B are isopach maps of the Middle Morrow and Lower Morrow zones. The well was initially placed in the SW¼SE¼ §19 to locate the well where it could adequately test both Morrow zones. Moving the well to the east will risk missing the Lower Morrow. As a result, applicant does not want to move the well to the E½SE¼.

The acreage is federal, and the Bureau of Land Management requested that the well be moved 330 feet north of the original location to avoid a dry playa area, and 120 feet west to avoid electric lines and pipelines. See Exhibit C.

The unorthodox location is internal to the well unit. Therefore, notice of this application is not required to be given to anyone, and applicant requests a waiver of the 20 day notice period.

Please contact me if you need any further information on this application.

Very truly yours,

ames Bruce

Attorney for Gruy Petroleum Management Company

TOPERATOR'S COEE FORM APPROVED Fe m 3160-3 SUBMIT IN TRIPLICATE\* OMB NO. 1004-0136 (July 1992) UNITED STATES Expires: February 28, 1995 (Other instructions or DEPARTMENT OF THE INTERIOR reverse side) 5. LEASE DESIGNATION AND SERIAL NO. BUREAU OF LAND MANAGEMENT LC 028784-B 628793A 6. IF INDIAN, ALLOTTES OR TRIBE NAME APPLICATION FOR PERMIT TO DRILL OR DEEPEN 1a. TYPE OF WORK 7. UNIT AGREEMENT NAME DRILL X DEEPEN 1b. TYPE OF WELL MULTIPLE SINGLE Grayburg Deep Unit /1/11 70954 GAS OIL 8. FARM OR LEASE NAME, WELL N WELL OTHER **ZONE** 2. NAME OF OPERATOR Grayburg Deep Unit No. 20 Gruy Petroleum Management Co. 9. API WELL NO. 3. ADDRESS AND TELEPHONE NO. P.O. Box 140907 Irving TX 75014 972-401-3111 10. FIELD AND POOL, OR WILDCAT 4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.") Sand Tank Morrow 11. SEC. T.,R.,M., BLOCK AND SURVEY 1640' FSL & 2100' FEL Sec. 19-17S-30E OR AREA Sec. 19 T17S R30E 14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE 12, COUNTY OR PARISH 13. STATE 26 miles East of Artesia Eddy NM 15, DISTANCE FROM PROPOSED 16. NO. OF ACRES IN LEASE 17. NO. OF ACRES ASSIGNED LOCATION TO NEAREST TO THIS WELL PROPERTY OR LEASE LINE, T.O. (Also to nearest drig. unit line, if any) 320 18. DISTANCE FROM PROPOSED LOCATION 19. PROPOSED DEPTH 20. ROTARY OR CABLE TOOLS TO NEAREST WELL, DRILLING COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 12500' Rotary 21. ELEVATIONS (Show whether DF, RT, GR, etc.) 22. APPROX. DATE WORK WILL START Recent Controlled Water Besin 06-30-05 3619' GR PROPOSED CASING AND CEMENTING PROGRAM SIZE OF HOLE GRADE, SIZE OF CASING **WEIGHT PER FOOT** SETTING DEPTH QUANTITY OF CEMENT J-55 13 3/8" 350' - 500' \* 54.5 # 17-1/2" 490 sx circulate P-110/N-80 9 5/8" 12-1/4" 40 # 4000' 1200 sx circulate 7-7/8" P-110 5 1/2" 12500' 17# 1620 sx TOC 2700' \*Set surface casing 25' into the top of the Rustler, which is estimated to be between 350' and 500'. From the base of the surface pipe through the running of production casing, the well will be equipped with a 5000 - psi BOP system. We are requesting a variance for the 13 3/8" surface casing and BOP testing from Onshore Order No. 2, which states all casing strings below the conductor shall be pressure tested to .22 psi per foot or 1500#, whichever is greater, but not to exceed 70% of the manufacturer's stated maximum internal yield. During the running of the surface pipe and the drilling of the intermediate hole we do not anticipate any pressures greater than 1000#, and we are requesting a variance to test the 13 3/8" casing and BOP system to 1000# psi and use rig pumps instead of an independent service company. IN ABOVE SPACE, DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any SIGNED TITLE Mgr. Ops. Admin DATE 05-05-05 (This space for Federal or State office use PERMIT No. APPROVAL DATE equitable title to those rights in the ntitle the applicant to conduct operations thereon

APPROVED BY TO See Instructions On

DATE

L FOR 1 YEAR

**EXHIBIT** 

\*See Instructions On Reverse Side

APPROVIDE TO See the 1004 makes its string for any person knowingly and willfully to make to any department or agency

GENERATION OF THE PROVIDE TO SEE THE PROVIDE TO S

SPECIAL STIPULATIONS

CONDITIONS OF APPROVAL, IF ANY:

ATTACHED

DISTRICT I 1625 N. PRENCH DR., HOBBS, NM 88240

Energy, Minerals and Natural Resources Department

DISTRICT II 1301 V. GRAND AVENUE, ARTESIA, NM 68210 OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe. New Mexico 87505

Revised JUNE 10, 2003 Submit to Appropriate District Office State Lease -- 4 Copies Fee Lease -- 3 Copies

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV

Santa Fe, New Mexico 87505

WELL LOCATION AND ACREAGE DEDICATION PLAT

T AMENDED REPORT

Form C-102

1220 S. ST. FRANCIS DR., SANTA FE, NM S	7505	□ AMERDED REPOR
API Number	Pool Code Sand Tank; Atoka	Pool Name
Property Code	Property Name GRAYBURG DEEP UNIT	Well Number 20
ogrid No. 162683	GRUY PETROLEUM MANAGEMENT COMPA	NY 3619'

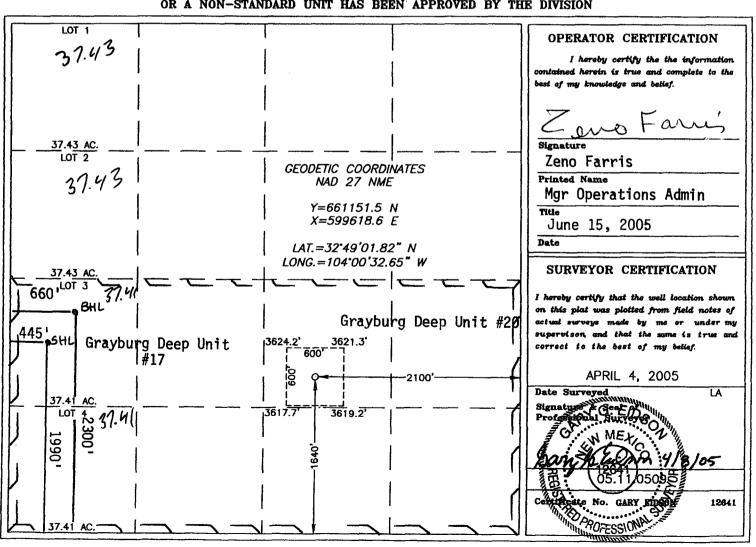
### Surface Location

- [	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
	J	19	17-S	30-E		1640	SOUTH	2100	EAST	EDDY

#### Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres Joint or Infill Consolidation Code Order No.									
320	Y	'							
L							<u> </u>		<del></del>

# NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



DISTRICT I 1625 N. FRENCH DR., HORRS, NY 68240

Energy, Minerals and Natural Resources Department

DISTRICT II 1301 V. GRAND AVENUE, ARTESIA, NW 88210 OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DR. Santa Fe, New Mexico 87505 Form C-102

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Submit to Appropriate District Office

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WELL LOCATION AND ACREAGE DEDICATION PLAT

□ AMENDED REPORT

220 S. St. Francis Dr., Santa Pe, NW 87	505	L AMENDED REPUR
API Number		Pool Name
	Sand Tank; Morrow	
Property Code	Property Name	Well Number
	GRAYBURG DEEP UNIT	20
OGRID No.	Operator Name	Elevation
162683	GRUY PETROLEUM MANAGEMENT COMPAN	Y 3619'

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