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Mid-Continent Region
Exploration/Production

Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

February 4, 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)

D.M. Warren #137 New Drill Section 30, T-20-S, R-38-E,M 400 FSL & 990 FWL API # Not Available Lea County, NM

SEMU # 139 New Drill Section 25, T-20-S, R-37-E, A 990' FNL & 330' FEL API # Not Available Lea County, NM

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State 25 A #3 New Drill Section 25, T-20-S, R-37-E, N 1980' FWL & 510' FSL API # Not available Lea County, NM

Dear Mr. Stogner,

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

The North Hardy Strawn pool rules state that a standard location is 660' from the outer boundary of the 160 acre proration unit. The D.M. Warren #137 is located only 400' FSL and the SEMU # 139 is only 330' FEL, & the State 25-A #3 is only 510' FSL. All three wells are staked at an unorthodox location. Please reference attached C-102 plats.

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 wells will not compromise the validity of the scientific data that resulted in the proposal to drill the wells. 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 these three wells would result in an unsuccessful Strawn well completion. Conoco, Inc believes that the three proposed unorthodox locations are strategically staked where the good porosity development of the Strawn reservoir lies on trend with structure.

D. M. Warren #137 - See Exhibit 1

This well location was chosen to move slightly updip of the SEMU #134 and remain in the same porosity interval. The seismic line (Exhibit 1) is located in a north-south orientation and passes through the SEMU #134 well and the proposed location. The line illustrates the reservoir interval as the zone between the yellow and blue seismic picks at approximately 1060 milliseconds. The porosity development is not very extensive and this location will place the well in an optimum position with the highest amplitude within this seismic anomaly.

SEMU #139 - See Exhibit 2

This location was chosen as a northern extension of the productive zone within the Strawn in the Hardy 36 #26 well. The seismic line (Exhibit 2) is located through the Hardy 36 #26 well and the proposed location. The reservoir interval is located between the yellow and blue seismic picks at approximately 1060 milliseconds. The interpreted porosity zone is discontinuous north of the Hardy 36 #26 well toward the proposed location with several zones of low or absent porosity (the blue seismic peak is thin or missing). This well will evaluate an undrilled and structurally lower portion of the seismic anomaly at its thickest position.

State '25-A' #3 - See Exhibit 3

This location was chosen as a northwest down dip extension of the Hardy 36 #26 well. The seismic line (Exhibit 3) is located through the Hardy 36 #26 well and the proposed location. The reservoir interval is located between the yellow and blue seismic picks at approximately 1060 milliseconds. The interpreted porosity zone is very discontinuous as illustrated by the abrupt termination of the peak being mapped. Moving this location further north would place it beyond the porosity zone which correlates to the productive zone in the Hardy 36 #26. This location is also at the position of highest amplitude within the porosity zone.

Please note that Conoco Inc. will only be encroaching interior to their lease. There is no notification required to an offset operator.

Conoco, Inc. respectfully requests that a non-standard location order be granted for the D.M. Warren #137, SEMU # 139 and the State A-25 #3. 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 1 PO Box 1980, Hobbs. NM 88241-1980

State of New Mexico Energy, Minerals & Natural Resources Department

Revised February 21, 1994 instructions on back

District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410 District IV

PO Box 2088, Santa Fe. NM 87504-2088

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

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

AMENDED REPORT

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				D.M. Wa			# 137				
7 OGRID No	_			•	tor Name		9 Elevation				
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