

## EL PASO ENERGY RATON, L.L.C. P.O. BOX 190 - RATON, N.M. 87740

4 APR - 1 2002

March 27, 2002

Mike Stogner New Mexico Oil Conservation Division 1220 South St. Francis Santa Fe, New Mexico 87505

RE: Admin. Order NSL # 4251

Dear Mike:

According to Administrative Order NSL # 4251 we are required to stake wells:

..."no closer than the required minimum orthodox distance (660 feet) to: (i) the outer boundary from the Vermejo Park Ranch lease; or (ii) the New Mexico/Colorado state-line, nor closer than 10 feet to any quarter-quarter section line or subdivision inner boundary."...

Our Field Construction Foreman, along with the Vermejo Park Ranch Representative, after much consideration, has preliminarily staked the **VPRF-17** well location approximately 480 ft. south of the New Mexico/Colorado state-line (see attached surveyors plat). Surface owner and mineral owner also have the adjoining acreage across state-line.

According to Rule 104.F, we are requesting approval for a Non-Standard Location for topographical reasons. The terrain is mountainous and severe. Topography to the south is steep mountain side and almost inaccessible. Further south, there is a canyon floor, which would require excessive construction costs and extreme water line pressures due to elevation difference (see attached topographical vicinity map).

District 4 Superintendent, Roy Johnson, expected the proposed location on Mar. 26, 2002.

Respectfully,

Don Lankford Drilling Engineer

De Lack

District I

<sup>4</sup> Property Code

24648

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

<sup>1</sup> API Number

State of New Mexico
Energy, Minerals & Natural Resources Department

<sup>2</sup> Pool Code

96970

OIL CONSERVATION DIVISION

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

<sup>5</sup> Property Name

VERMEJO PARK RANCH

Form C-102

Revised August 15, 2000

Submit to Appropriate District Office

State Lease - 4 Copies

Fee Lease - 3 Copies

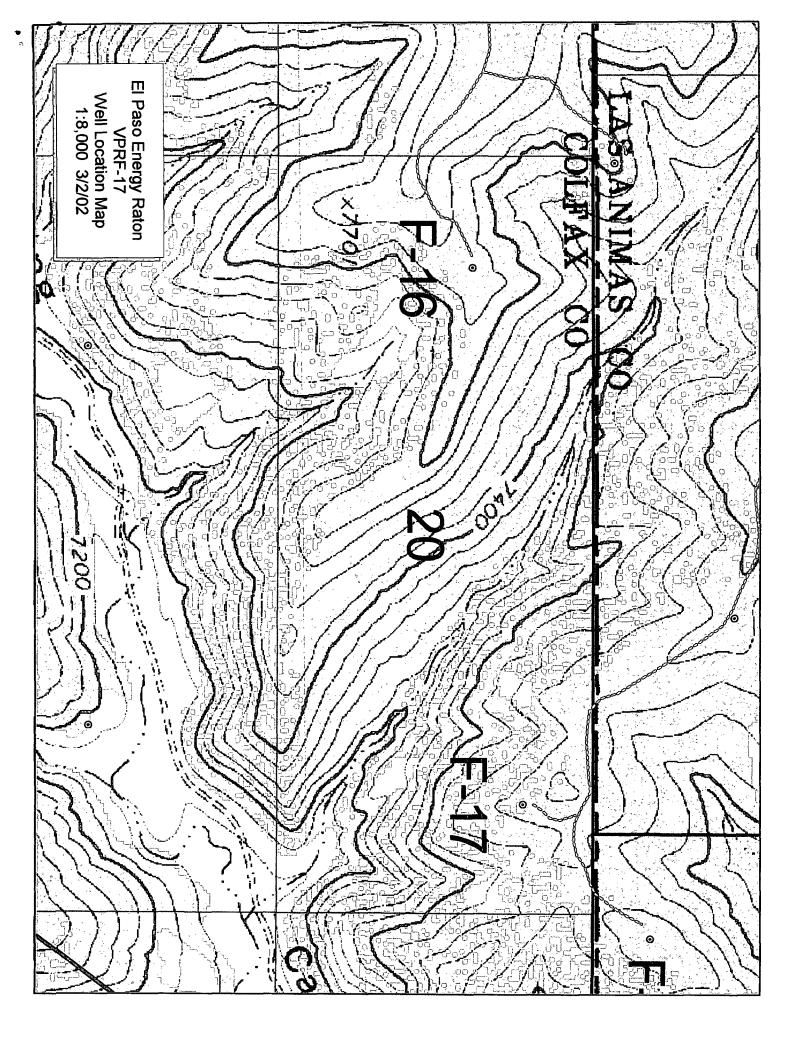
<sup>6</sup> Well Number

VPR'F'-17

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AMENDED REPORT
WELL LOCATION AND ACREAGE DEDICATION PLAT

STUBBLEFIELD CANYON RATON - VERMEJO GAS

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<sup>2</sup> Dedicated Acres <sup>11</sup> Joint or Infil	wnship Range fill 14 Consolidation	Lot Idu	Feet from the			E-ANV-ALI-	
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NO ALLOWABLE WILL E	DD 400100			<u> </u>	<u> </u>		
				INTIL ALL INTER		EEN CONSOLID	ATED OR A NO
STATE LINE	Colo NM			776 FLO6/	I hereby cert and complete  Signsture  Printed Name  Title  Date  18 SURV I hereby cert plotted from under my su to the best of March 15, 200  Date of Survey	Seal of Professional Survey	CONTAINED  CINEER  CIFICATION Shown on this plat was beys made by me or time is true and correct  COT:



## Stogner, Michael

From:

Johnson, Roy

Sent:

Thursday, April 18, 2002 3:35 PM

To:

Stogner, Michael

Subject:

NSL, El Paso Energy Raton

Mike, I walked out the location for VPR 'F' 17 on March 26, 2002 and found that this is the very best place for this location. Being close to the Colorado border should not be of concern as Vermejo Park Ranch is the offsetting acreage and there are a couple of Colorado wells that crowd the border as well.

I recommend this application for approval.

Roy Johnson District Supervisor