NSL CONOCO

.101 1 4 1997

Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

July 11, 1997

Mr. Michael Stogner New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87504

RE: Application for Approval of an Unorthodox Fruitland Coal Location for the Federal No. 21 Well, located at 315' FNL & 720' FWL, Sec. 9, T-27N, R-8W, caused by Recompletion from a deeper horizon

Dear Mr. Stogner:

This well was originally drilled by Mesa Petroleum as a potential Dakota completion under the name of Federal No. 16-E. This unorthodox drilling location for the Basin Dakota Pool was approved by Administrative Order NSL-1141 (ATTACHMENT 1) following the receipt of waivers from offset operators. Letters to the offset operators stated "the reason for this unorthodox location is because of terrain difficulties."

When the Dakota was found to be nonproductive, the well was recompleted to the Chacra formation which necessitated a name change to the current Federal No. 21. It is now desired to recomplete the well to the Fruitland Coal under the same name. This location for the recompletion willbe unorthodox (a) because of the 315' distance from the north line, which was previously approved for the drilling of the well to a deeper horizon, and (b) because it is not in the SW/4 of the section as stipulated by Rule 7 of the Basin Fruitland Coal special pool rules.

ATTACHMENT 2 is a map showing (a) all Fruitland Coal completions in the surrounding sections, (b) the proposed Federal No. 21 recompletion, (c) the W/2 spacing unit, and (d) the names of the offset operators. Note that there are no completions to the Southeast of the Federal No. 21 location indicating that it is on the edge of current FC development and does not warrant the step-out drilling of a new well at an orthodox location in the SW/4 of Section 9, as required by Rule 7. The only economical way to access any remaining reserves in the W/2 of Section 9 would be through the recompletion of an existing well.

Therefore, it is requested that an unorthodox location for the recompletion of the Federal No. 21 to the Fruitland Coal be approved both (a) for the footage exception, as previously approved for deeper zones, and (b) for the unorthodox quarter-section location for the first Fruitland Coal well in the west half of Section 9 be granted.

A copy of this application has been sent to offset operators as shown on the map by certified mail and copies of the certified mail receipts are included as ATTACHMENT'3. If there are any further questions concerning this application please call me at (915) 686-6548.

Very truly yours,

Jerry W. Hoover Sr. Conservation Coordinator

cc: Oil Conservation Division - Aztec



STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

January 14, 1980

BRUCE KING

LARRY KEHOE SECRETARY

> Mesa Petroleum Co. 2800 Lincoln Center Building 1660 Lincoln Street Denver, Colorado 80264

Attention: Mr. Jed W. Lemmons Division Land Manager

Administrative Order NSL-1141

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LAND THE DAY

POST OFFICE BOX 2088

1505) 827-2434

STATE LAND OFFICE BUILDING SANTA FE NEW MEXICO 87501

Gentlemen:

Reference is made to your application for a non-standard location for your Federal Well No. 16-E to be located 315 feet from the North line and 720 feet from the West line of Section 9, Township 27 North, Range 8 West, NMPM, Basin Dakota Pool, San Juan County, New Mexico.

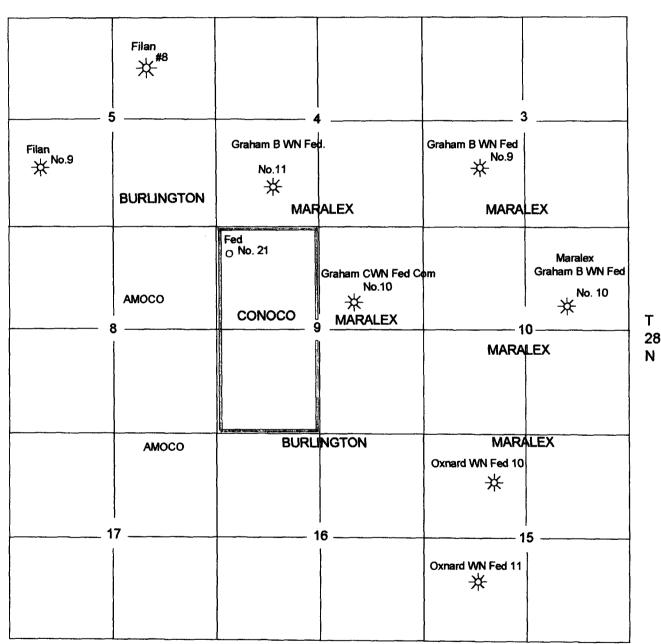
By authority granted me under the provisions of Rule 3 of Order No. R-1670-V, the above-described unorthodox location is hereby approved.

Slincerelv JOE D. RAMEY Director

JDR/RLS/dr

cc: Oil Conservation Division - Aztec
Oil & Gas Engineering Committee - Hobbs
U. S. Geological Survey - Farmington

ATTACHMENT 1



R7W

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Fruitland Producers & Offset Operators Unorthodox Fruitland Locations

ATTACHMENT 2

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ATTACHMENT 3