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**DANIEL S. NUTTER**

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November 14, 1985

Mr. R. L. Stamets, Director  
Oil Conservation Division  
Energy and Minerals Department  
Post Office Box 2088  
Santa Fe, New Mexico 87504

OK RLL

Re: Doyle Hartman Application  
For Unorthodox Location  
H. S. Record Well No. 9  
660' FNL and 1820' FEL  
Sec. 22, T-22-S, R-36-E  
Jalmat Gas Pool, Lea Co., N.M.

Dear Mr. Stamets:

Reference is made to Doyle Hartman's letter dated October 28, 1985, wherein he requested approval for the unorthodox location of his proposed H. S. Record Well No. 9, which would be drilled at a point 660 feet from the North line and 1820 feet from the East line of Section 22, Township 22 South, Range 36 East, NMPM, Jalmat Gas Pool, Lea County, New Mexico, and would, according to the letter, "be drilled on an existing 120-acre non-standard Jalmat (Gas) proration unit comprised of the NW/4 NE/4 & S/2 NE/4 Section 22, T-22-S, R-36-E."

It is our understanding that some question has arisen as to the actual existence of this non-standard proration unit which was approved on March 26, 1982, by Division Order No. R-6927, because the proposed unit well, Sun's H. S. Record Well No. 8, was originally completed as an oil well in the Jalmat pool rather than as a gas well as had been anticipated when the hearing resulting in Order No. R-6927 was held in March of 1982.

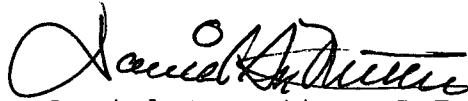
A review of the production history of the Record No. 8 will show that the well produced with a steadily increasing gas-oil ratio, and that in fact, it made no oil or condensate at all during the last two months of production, thereby producing with a GOR in excess of the Jalmat gas well classification GOR of 100,000 to one.

R. L. Stamets  
November 14, 1985  
Page 2

We therefore respectfully submit that the proration unit, even though not activated upon original completion of Record Well No 8, should have been activated upon the well's going to 100 percent gas, and should still be in effect, because the well, though not currently producing, has not been abandoned in the Jalmat Gas Pool.

Inasmuch as this does not constitute a change in the application, that Mr. Hartman's proposed Record Well No. 9 will be dedicated to an existing proration unit, we would urge you to consider the application as received by your office on October 30, 1985, as a valid application due for processing on November 19, that no further notice to offset operators is required, and that, in the absence of objection by that date, it is eligible for approval.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Daniel S. Nutter", with a stylized flourish at the end.

Daniel S. Nutter, P.E. and  
Agent, Doyle Hartman

DSN:ms

cc: Doyle Hartman  
500 North Main  
Midland, TX 79701