KELLAHIN & KELLAHIN Attorney at Law

W. Thomas Kellahin New Mexico Board of Legal Specialization Recognized Specialist in the area of Natural resourcesoil and gas law

P.O. Box 2265 Santa Fe, New Mexico 87504 117 North Guadalupe Santa Fe, New Mexico 87501

January 21, 2003

Telephone 505-982-4285 Facsimile 505-982-2047 tkellahin@aol.com

HAND DELIVERED

Ms. Lori Wrotenbery, Director Oil Conservation Division 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

 Re: Administrative Application of Apache Corporation for approval of a unorthodox well location for its Hawk B-1 Well No. 32, Unit I, NE/4SE/4 dedication, Section 8 T21S, R37E, Lea County, New Mexico Penrose Skelly-Grayburg Pool.

Dear Ms. Wrotenbery:

On behalf of Apache Corporation, please find enclosed our referenced application that is being filed in accordance with Division Rule 104.D(2)(b)). This location crowds the interior quarter-quarter lines within the SE/4 with the well located in the NE/4SE/4 (Unit I)

en a star france.

Very truly Thomas Kellahin CC: Apache Corporation Attn: Kevin Mayes

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

APPLICATION OF APACHE CORPORATION FOR APPROVAL OF AN UNORTHODOX WELL LOCATION LEA COUNTY, NEW MEXICO

ADMINISTRATIVE APPLICATION

Comes now Apache Corporation ("Apache") and by and through its attorneys, Kellahin & Kellahin, and in accordance with Division General Rule 104.F, applies to the New Mexico Oil Conservation Division ("Division") for approval of an unorthodox oil well location for its Hawk B-1 Well No. 32, to be located 1365 feet FSL and 1310 feet FEL line (Unit I) of Section 8, T21S, R37E, Lea County, New Mexico to be dedicated to a standard 40-acre oil spacing unit consisting of the NE/4SE/4 of this section for production from the Penrose Skelly-Grayburg Pool and simultaneously dedicated with the Hawk B-1 Well No 21.

In support, Apache states:

- Apache is the operator of this SE/4 of this section which contains 7 wells:

 (a) NW/4SE/4 (Unit J) Hawk B-1 Well No. 22 and Hawk B-1Well No. 14
 (b) SW/4SE/4 (Unit O) Hawk B-1 Well No. 12
 (c)SE/4SE/4 (Unit P) Hawk B-1 Well No. 10 and Hawk B-1 Well No. 18
 (d)NE/4SE/4 (Unit I) Hawk B-1 Well No. 11 Hawk B-1 Well No. 21
- 2. The SE/4 of Section 8 is within the current boundary of the Penrose Skelly-Grayburg Pool and is subject to Division Rule 104.

NMOCD Administrative Application Apache Corporation Page

> 3. In order to better drain the SE/4 of Section 8, Apache proposes to drill its Hawk B-1 Well No. 32 in Unit I by as close to the center of the quartersection as possible and still be located within a specified 40-acre spacing unit.

TECHNICAL EVIDENCE

4. Apache would like to test the Grayburg formation based upon the following geologic and petroleum engineering evidence:

See Exhibit 2: geological summary See Exhibit 3: production data See Exhibit 4: portion of log of subject well See Exhibit 5: Grayburg isopach See Exhibit 6: oil in place/EUR calculations/drainage estimated

5. Apache's proposed unorthodox well location encroached on an internal boundary of the common acreage in the SE/4 of this section.

NOTIFICATION

6. The SE/4 of this Section is part of the same federal oil & gas Lease (NM 90161, dated March 1, 1958) and has common working interest owners and overriding royalty owners.

7. Notice has been sent to all of the interest owners in the SE/4 of Section 8. See Exhibit 7

8. All of the interest owners in SE/4 Section 8 are the same.

9. Approval of this application will afford the owners and the applicant the opportunity to produce their just and equitable share of the gas in the Atoka formation, will promote the orderly development in this area, will prevent the economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells and will otherwise prevent waste and protect correlative rights.

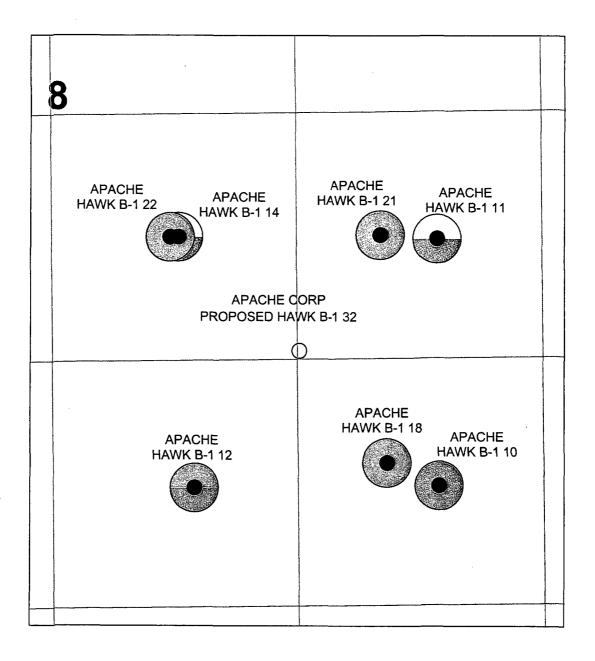
NMOCD Administrative Application Apache Corporation Page

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WHEREFORE, Applicant requests that this application be approve by the Division.

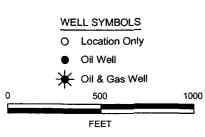
Respectfully Submitted: W. Thomas Kellahin

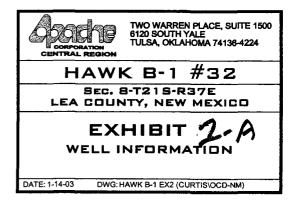




GRAYBURG PRODUCER
 BLINEBRY PRODUCER
 TUBB PRODUCER
 DRINKARD PRODUCER
 ABO PRODUCER

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DISTRICT III			OIL CONSERVATION DIVISION P.0. Box 2088 State Lease - 4 Copie Fee Lease - 3 Copie										
1000 Rio Brazoe 1	Rd., Aztec, N	M 87410		Santa F	°e, Ne₩	Mexic	o 87504-2088						
DISTRICT IV P.O. BOX 2088, SANT	а <u>ре</u> , м. 87	504-2088 -	WELL LC	CATION	AND .	ACREA	GE DEDICATI	ON PLAT	AMENDED	REPORT			
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EXHIBIT 1

Application of Apache Corporation for administrative approval of an unorthodox well location:

20 acres – 1,365' FSL & 1310' FEL Section 8, Township 21 South, Range 37 East, NMPM Lea County, New Mexico

PRIMARY OBJECTIVE: Grayburg

SECONDART OBJECTIVE: None

In support:

- EXHIBIT
- 1. Apache Corporation (Apache) is the operator of the proposed Hawk B-1 #32 well. Exhibit 1
- 2. The proposed unorthodox Grayburg location encroaches toward the NW/4, SE/4; the SW/4, SE/4; and the SE/4, SE/4 which contains the Apache Hawk B-1 #22, 12 and 18 wells. The Hawk B-1 #21 in the same spacing unit also produces from the Grayburg and with which the proposed well will share an allowable. There are also 4 wells which have produced from the Blinebry, Tubb and/or Drinkard formations. The proposed well will not be drilled deep enough to encounter the Blinebry, Tubb and/or Drinkard reservoirs. Exhibit 2
- 3. All the wells producing from the Grayburg are placed in the Penrose Skelly (Grayburg) pool.
- 4. The proposed unorthodox Grayburg location is based on geological necessity and drainage considerations:

a. Grayburg Geology (Exhibit 4)

The Upper Grayburg Hydrocarbon Pore Volume (HCPV) map was abstracted from a larger map. Hydrocarbon pore volume is the footage of oil saturated porosity. HCPV is the product of h (feet of porosity above a 6% cutoff), PhiA (average porosity) across the Grayburg reservoir, and So (oil saturation). The h value was picked from all available porosity logs, regardless of vintage. PhiA was calculated from "modern" porosity logs when both neutron and density values are available to calculate a lithology dependent "cross plot" porosity. So was calculated from the current production stream.

The Hawk B-1 #12 has only produced from the upper Grayburg (Exhibit 5). Recent Apache activity in offsetting sections has demonstrated that commercial reserves are also present in the lower Grayburg (Exhibit 6). Sufficient lower Grayburg HCPV can be encountered in the SW/4, SE/4 of Section 8 to support drilling a well. However, the risk of depletion in the upper Grayburg is greatest in the same SW/4, SE/4 (Exhibit 3). Thus, a well located approximately equi-distant between the older producers

should minimize depletion risk in the upper Grayburg and encounter comparable amounts of lower Grayburg HCPV to maximize Apache's return on its investment.

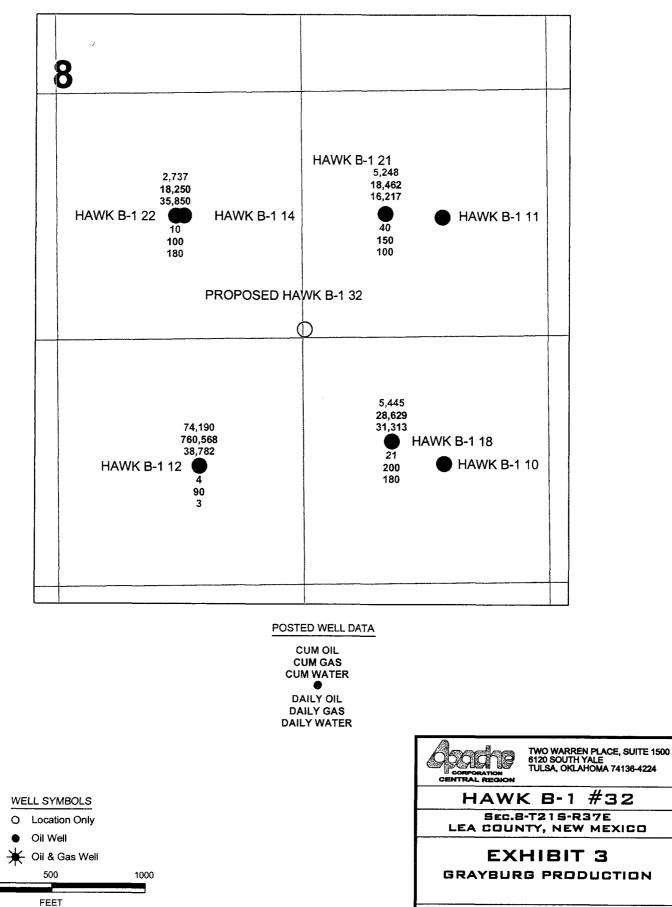
5. Notice

Apache is the operator of the Grayburg wells toward which the proposed well will encroach. All of the working interest owners in those wells have been notified, being:

> Chevron/Texaco 15 Smith Road Midland, TX 79705 Attn: Ms. Denise Beckham

BP America Production Co. 501 Westlake Park Blvd WL1- Room 6.199 Houston, Texas 77079 Attn: Mr. Lee Scarborough

Minerals Management Service P. O. Box 5810 TA Denver, CO 80217-5810



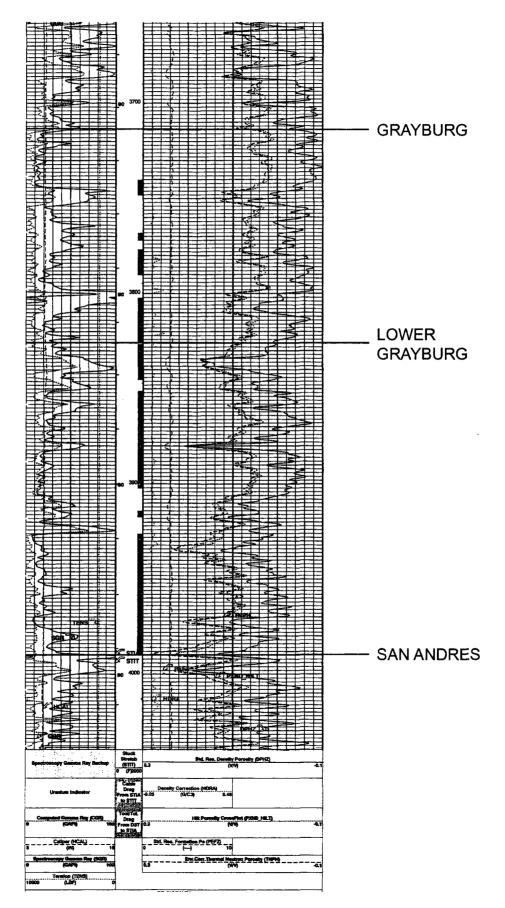
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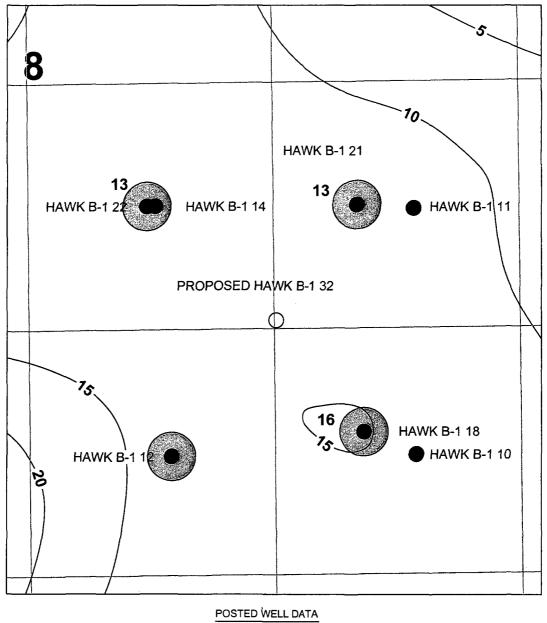
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DATE: 1-14-03 DWG: HAWK B-1 32 PROD (CURTIS/OCD-NM)

APACHE CORP. STATE "C" TRACT 12 11 Sec. 16 T21S R37E LEA COUNTY, NEW MEXICO





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APPLICATION OF APACHE CORPORATION UNORTHODOX WELL LOCATION HAWK B-1 #32 OFFSET ULTIMATE RECOVERIES AND DRAINAGE AREAS IN THE GRAYBURG FORMATION

	NET PAY	AVG	AVG		DRAINAGE		Bo	Rs	Rs	Rs	Bg	RECOVERY	RECOVERA	BLE RESERVES
WELL NAME	(FT)	POROSITY	WATER SAT	Boi	ACRES	OOIP	ABANDON	INITIAL	ABANDON	CUMULATIVE	ABANDON	FACTOR	(STBO)	(MCF)
HAWK B-1 12	14	12	40	1.38	160	906,674	1.05	1000	125	10250	0.05	0.09	81,601	836,407
HAWK B-1 18	90	8	70	1.38	14	170,001	1.05	1000	125	12000	0.05	0.07	11,900	142,801
HAWK B-1 21	93	8	60	1.38	12	200,764	1.05	1000	125	12000	0.05	0.07	14,053	168,641
HAWK B-1 22	121	8	70	1.38	5	81,628	1.05	1000	125	15000	0.05	0.06	4,898	73,465



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KELLAHIN & KELLAHIN Attorney at Law

W. Thomas Kellahin New Mexico Board of Legal Specialization Recognized Specialist in the area of Natural resourcesoil and gas law

P.O. Box 2265 Santa Fe, New Mexico 87504 117 North Guadalupe Santa Fe, New Mexico 87501 January 22, 2003

Telephone 505-982-4285 Facsimile 505-982-2047 tkellahin@aol.com

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF THE FOLLOWING NEW MEXICO OIL CONSERVATION **DIVISION ADMINISTRATIVE CASE:**

Re: Administrative Application of Apache Corporation for approval of unorthodox Grayburg location for its Hawk B-1 Well No. 32, NE/4SE/4 Section 8, T21S, R37E, Lea County, New Mexico.

On behalf of Apache Corporation, please find enclosed a copy of its referenced administrative application. If you have no objection, then there is nothing for you to do. However, should you have any objection to the Division approving this application, then it will be necessary for you to file a written objection with the New Mexico Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505 within twenty (20) days of the date of this letter. Failure to file a timely objection will preclude you from objecting at a later date.

Very truly yours.

Thomas Kellahin

NOTIFICATION LIST

Application of Apache Corporation for Administrative Approval of an unorthodox well location:

Hawk B-1 # 32 Well

1365' FSL & 1310' FEL Section 8, Township 21 South, Range 37 East, NMPM Lea County, New Mexico

OFFSET OPERATOR, WORKING INTEREST OWNERS, ROYALTY OWNER OVERIDE OWNERS, SE/4 SECTION 5

1/23

a. . .

- Apache Corporation WI 50%
 Two Warren Place, Suite 1500
 6120 South Yale Avenue
 Tulsa, Oklahoma 74136
- 2. Chevron/Texaco WI 25%
 15 Smith Road Midland, Texas Attn: Ms Denise Beckham
- BP America Production Co. WI Z 5%
 501 Westlake Park Blvd WL1- Room 6.199 Houston, Texas 77079 Attn: Mr. Lee Scarborough
- Minerals Management Service RI P O Box 5810 TA Denver, CO 80217-5810
- 5. Apache Corporation OR 2000 Post Oak Blvd, Suite 100 Houston, Texas 77056