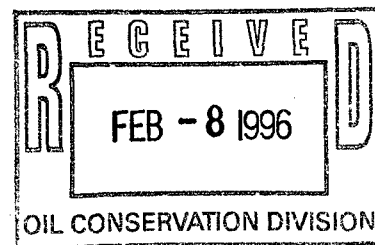


DOYLE HARTMAN
Oil Operator



February 7, 1996

Federal Express

William J. LeMay, Director
Energy and Minerals Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Administrative Application for:
1. Simultaneous Dedication
2. Rule 104(F) (2) Unorthodox location

Britt Laughlin "Com" No. 8
1980' FSL & 1980' FEL (J)
Section 5, T-20-S, R-37-E
Lea County, New Mexico

Gentlemen:

With respect to that certain C-101 filed by us with the NMOCD on January 19, 1996, we have successfully re-entered and re-completed, as a Eumont gas well, the previously plugged and abandoned Laughlin No. 1 Eunice-Monument well situated at an orthodox Eunice-Monument location consisting of 1980' FSL and 1980' FEL Section 5, T-20-S, R-37-E, Lea County, New Mexico.

Consequently, we hereby request administrative approval to simultaneously dedicate our Britt-Laughlin "Com" No. 8 (formerly Laughlin No. 1) infill well to the previously approved 280-acre Britt-Laughlin "Com" Eumont gas proration unit consisting of the SE/4, SE/4SW/4 Section 5 and NE/4NE/4, NE/4NW/4 Section 8, T-20-S, R-37-E, Lea County, New Mexico. Also, so as to prevent waste caused by the drilling of unnecessary wells, and as provided under NMOCD rule 104 (F) (2), we respectfully request that the existing Britt Laughlin Com No. 8 well location consisting of 1980' FSL and 1980' FEL of Section 5, T-20-S, R-37-E be administratively approved as an unorthodox Eumont location resulting from:

"...the re-completion of a well previously drilled to a deeper horizon ..." where "... said well was drilled at an orthodox or approved location for such original horizon..."

To assist you in your processing of this application, a color-coded land map depicting the 280-acre Britt-Laughlin Eumont proration unit and proposed unorthodox Eumont location is enclosed herewith. Supplementing the enclosed color-coded land plat is a companion table describing, by tract number, all adjoining and diagonal Eumont proration units as defined by NMOCD rule 104(F) (3) (a).

Finally, in compliance with NMOCD rule 104 (F) (3) (a), we hereby attest that complete copies of this application were sent this date, by Certified-Return Receipt mail, to the below listed adjoining and diagonal Eumont spacing unit operators advising such operators that, as to any legitimate objection that they may have to this application, such objection must be filed in writing with the NMOCD within twenty days from the date that our notice was sent.

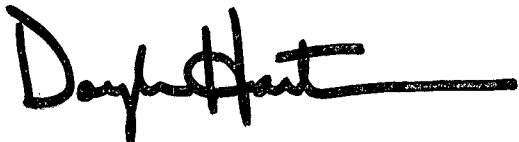
1. Marathon Oil Company
125 W. Missouri
Midland, Texas 79701

2. Texaco Exploration & Production Inc.
500 North Loraine
Midland, Texas 79701

Thank you for your consideration in this matter.

Very truly yours,

DOYLE HARTMAN

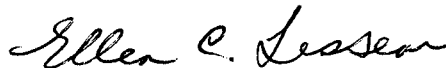
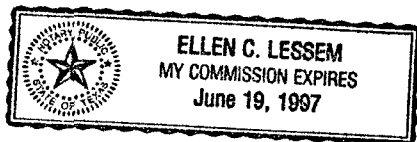


Doyle Hartman

DH/jb
Enclosures

wd2:ocd122

SWORN TO AND SUBSCRIBED before me this 7TH day of FEBRUARY, 1996, in Dallas, Texas.



Notary Public

Printed Name
of Notary: ELLEN C. LESSEM

cc: Mr. Jerry Sexton, Supervisor
New Mexico Oil Conservation Division
P.O. Box 1980
Hobbs, N.M. 88241-1980

Mr. Michael Stogner, Chief Hearing Officer
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, N.M. 87505

Mr. Daniel S. Nutter
105 E. Alciante
Santa Fe, N.M. 87501

Mr. J.E. Gallegos
Gallegos Law Firm
460 St. Michaels Drive
Bldg. 300
Santa Fe, N.M. 87505

Mr. Jefferson Massey
500 North Main
Midland, Texas 79701

Mr. James A. Davidson
P.O. Box 494
Midland, Texas 79702

Mr. Don Mashburn
500 North Main
Midland, Texas 79701

Mr. Steve Hartman
500 North Main
Midland, Texas 79701

Ms. Cindy Brooks
500 North Main
Midland, Texas 79701

NORTH MOI Tract 1 30.UT.
AMERADA R1

Tract 2

MARATHON

BERTHA BARBER P.U.

S/2SW/4 SEC 32, T-19-S, R-37-E

NW/4, N/2SW/4 SEC 5, T-20-S, R-37-E
(320ac/AF=2.0)

TEXACO

COOPER-LOVE P.U.

S/2SE/4 SEC 32, T-19-S, R-37-E
(240ac/AF=1.5)

MONUMENT

Marathon

Bertha Barber No. 13

N-32-20-37

Marathon

Bertha Barber No. 14

M-32-20-37

Marathon

Bertha Barber No. 11

D-5-20-37

Marathon

Bertha Barber No. 15

C-5-20-37

Marathon

Bertha Barber No. 8

E-5-20-37

Marathon

Bertha Barber No. 4

K-5-20-37

Hartman

Britt Laughlin Com No. 2

N-5-20-37

Hartman

Britt Laughlin Com No. 1

C-8-20-37

HARTMAN

BRITT-LAUGHLIN "COM" P.U.

SE/4, SE/4SW/4 SEC 5

NE/4NE/4, NE/4NW/4 SEC 8

T-20-S, R-37-E

PROPOSED LOCATION

Britt Laughlin Com No. 8

1980'FSL&1980'FEL(J)

Sec 5, T-20-S, R-37-E

Elsie Reeves, et al (S)

Marathon

Laughlin

W.H. Laughlin Est.

Elsie Reeves et al (S)

NMOCD Rule 104 (F) (3) (a)
Adjoining and Diagonal Eumont Proration Units

1. Marathon Oil Company
 Bertha Barber P.U.
 S/2SW/4 Section 32, T-19-S, R-37-E
 NW/4, N/2SW/4 Section 5, T-20-S, R-37-E
 320 acres/AF=2.0
 (Pink)

2. Texaco Exploration & Production, Inc.
 Cooper-Love P.U.
 S/2SE/4 Section 32, T-19-S, R-37-E
 NE/4 Section 5, T-20-S, R-37-E
 240 acres/AF=1.5
 (Green)

104.F. UNORTHODOX LOCATIONS

(1) Well locations for producing wells and/or injection wells which are unorthodox based on the well location requirements of Rule 104.C(1)(a) above and which are necessary to permit the completion of an efficient production and injection pattern within a secondary recovery, tertiary recovery, or pressure maintenance project are hereby authorized, provided that any such unorthodox location within such project is no closer than the required minimum unorthodox distance to the outer boundary of the lease or the unitized area, nor closer than 10 feet to any quarter-quarter section line or subdivision inner boundary. Such locations shall only require such prior approval as is necessary for an orthodox location.

(2) The Division Director shall have authority to grant an exception to the well location requirements of Sections 104.B and 104.C above or to the well location requirements of special pool rules without notice and hearing when the necessity for such unorthodox location is based upon geologic conditions, archaeological conditions, topographical conditions, or the recompletion of a well previously drilled to a deeper horizon provided said well was drilled at an orthodox or approved unorthodox location for such original horizon.

(3) Applications for administrative approval of unorthodox locations pursuant to Rule 104.F(2), above, shall be accompanied by a plat showing the subject spacing unit, its proposed unorthodox well location, the diagonal and adjoining spacing units and/or leases (whichever is applicable) and wells, and a list of affected parties. If the proposed unorthodox location is based upon topography or archaeology, the plat shall also show and describe the existent topographical or archaeological conditions. If the proposed unorthodox location is based upon geology, the application shall include appropriate geologic exhibits and a discussion of the geologic conditions which result in the necessity for the unorthodox location.

(a) Adjoining and diagonal spacing units shall be defined as those immediately adjacent existing spacing units in the same pool(s) as the proposed unorthodox well and towards which the unorthodox well location encroaches.

Exhibit "B"
Case No. 11351
Order No. R-10533
Page No. 10

(h) Affected parties shall be defined as those parties who own interests in leases or operate wells on adjoining or diagonal spacing units and include:

- (i) the designated operator of any adjoining or diagonal spacing unit producing from the same pool(s) as the proposed well;
- (ii) in the absence of an operator, all lessees of record of any diagonal or adjoining lease owning interests in the same pool(s) as the proposed well; and
- (iii) in the absence of an operator or lessee, all owners of record of unleased mineral interests in the same pool(s) as the proposed well.

(4) The applicant shall submit a statement attesting that applicant, on or before the same date the application was submitted to the Division, has sent notification to the affected parties by submitting a copy of the application, including a copy of the plat described in Rule 104.F(3) above by certified or registered mail-return receipt in accordance with Rule 1207(A)(5) advising them that if they have an objection it must be filed in writing within twenty days from the date notice was sent. The Division Director may approve the unorthodox location upon receipt of waivers from all said parties or if no said party has entered an objection to the unorthodox location within 20 days after the Director has received the application.

(5) The Division Director may set any application for administrative approval of an unorthodox location for public hearing, and may require that a directional survey be run in the unorthodox well to establish the actual location of the producing interval(s).

104.G. Whenever an exception is granted, the Division may take such action as will offset any advantage which the person securing the exception may obtain over other producers by reason of the unorthodox location.

Exhibit "B"
Case No. 11351
Order No. R-10533
Page No. 11

DOYLE HARTMAN

Oil Operator

February 7, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

ADJACENT AND DIAGONAL EUMONT OPERATORS

Britt Laughlin Com No. 8
1980' FSL & 1980' FEL (J)
Section 5, T-20-S, R-37-E
Lea County, New Mexico

Re: Waiver and Notice Letter
Rule 104(F) (2) Unorthodox Location
Britt Laughlin Com No. 8
1980' FSL & 1980' FEL (J)
Section 5, T-20-S, R-37-E
Lea County, New Mexico

Gentlemen:

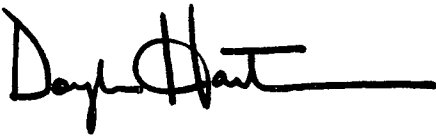
Reference is made to our Rule 104(F)(2) administrative application to the NMOCD dated February 7, 1996 (copy enclosed), for an unorthodox Eumont location for our Britt Laughlin Com No. 8 well consisting of 1980' FSL and 1980' FEL of Section 5, T-20-S, R-37-E, Lea County, New Mexico. As an adjoining or diagonal operator, as defined under Rule 104(F)(3)(a), we hereby respectfully request your written waiver of our Rule 104(F)(2) administrative application for an unorthodox location for the subject well.

If you are agreeable to granting to us a written waiver, please indicate your waiver of our administrative application by signing, in the space provided below, one (1) copy of this waiver letter and returning it to us, at your earliest convenience, in the enclosed pre-addressed pre-stamped envelope.

Thank you for your consideration in this matter.

Very truly yours,

DOYLE HARTMAN



Doyle Hartman

DH/jb
Enclosures
wd2/ocd122a

Waiver Letter
Rule 104(F) (2) Unorthodox Location
Britt Laughlin Com No. 8

AGREED TO AND APPROVED BY:

MARATHON OIL COMPANY

BY: _____

DATE: _____

AGREED TO AND APPROVED BY:

TEXACO EXPLORATION & PRODUCTION, INC.

BY: _____

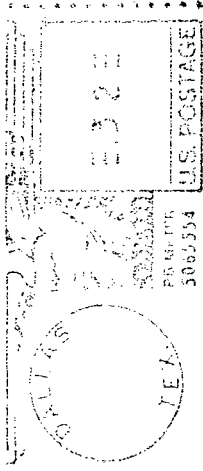
DATE: _____

DOYLE HARTMAN

Oil Operator

3811 TURTLE CREEK BLVD / SUITE 200
DALLAS, TEXAS 75219-4419

Doyle Hartman Oil Operator
3811 Turtle Creek Blvd.
200 Turtle Creek Centre
Dallas, Texas 75219-4419

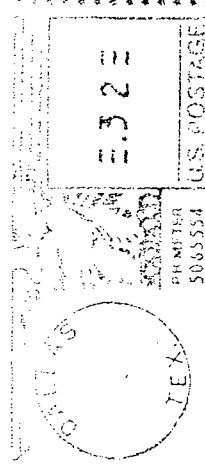


DOYLE HARTMAN

Oil Operator

3811 TURTLE CREEK BLVD / SUITE 200
DALLAS, TEXAS 75219-4419

Doyle Hartman Oil Operator
3811 Turtle Creek Blvd.
200 Turtle Creek Centre
Dallas, Texas 75219-4419



MAIL

2.98
U.S. POSTAGE

Z 252 672 987



**Receipt for
Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to: <u>Marathon Oil Company</u>	
Street and No: <u>125 W. Missouri</u>	
P.O. Name and Zip Code: <u>Midland, Texas 79701</u>	
Postage	\$ <u>0.88</u>
Certified Fee	\$ <u>1.10</u>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	\$ <u>1.10</u>
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$ <u>2.98</u>
Postmark or Date	

DOYLE HARTMAN

Oil Operator

1811 TURTLE CREEK BLVD / SUITE 200
DALLAS, TEXAS 75219-4419

Marathon Oil Company
125 W. Missouri
Midland, Texas 79701

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

**Marathon Oil Company
125 W. Missouri
Midland, Texas 79701**

5. Signature (Addressee)

6. Signature (Agent)

I also wish to receive the following services (for an extra fee):

- 1. ☐ Addressee's Address
- 2. ☐ Restricted Delivery

Consult postmaster for fee.

4. Article Number

Z 252 672 987

4b. Service Type

- ☐ Registered ☐ Insured
- ☒ Certified ☐ COD
- ☐ Express Mail ☒ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service

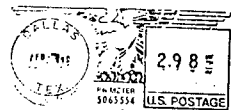
PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

CERTIFIED

Z 252 672 966

MAIL



Z 252 672 966



Receipt for
Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sender's Name and No.	Texaco Exploration & Production, Inc.
Address	500 N. Loraine
P.O. State and ZIP Code	Midland, Texas 79701
Postage	\$.88
Certified Fee	\$ 1.10
Special Delivery Fee	
Registered Mail Fee	
Return Receipt Showing to Whom & Date Delivered	\$ 1.10
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$ 2.98
Postmark or Date	

DOYLE HARTMAN
Oil Operator

1811 TURTLE CREEK BLVD / SUITE 300
DALLAS, TEXAS 75219-4419

Texaco Exploration & Production, Inc.
500 N. Loraine
Midland, Texas 79701

SENDER

- Complete items 1 and/or 2 for additional services
- Complete items 3 and 4a & b
- Print your name and address on the reverse of this form so that we can return this card to you
- Attach this form to the front of the mailpiece, or on the back if space does not permit
- Write "Return Receipt Requested" on the mailpiece below the article number
- The Return Receipt will show to whom the article was delivered and the date delivered

3. Article Addressed to:

Texaco Exploration & Production, Inc.
500 N. Loraine
Midland, Texas 79701

5. Signature (Addressee)

6. Signature (Agent)

I also wish to receive the following services (for an extra fee):

- 1. ☐ Addressee's Address
 - 2. ☐ Restricted Delivery
- Consult postmaster for fee

4a. Article Number

Z 252 672 966

4b. Service Type

- ☐ Registered ☐ Insured
- ☒ Certified ☐ COD
- ☐ Express Mail ☒ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

Is your RETURN ADDRESS completed on the reverse side?

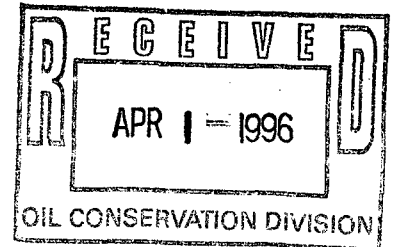
Thank you for using Return Receipt Service

PS Form 3811, December 1991 U.S.G.P.O. : 1992-307-530

DOMESTIC RETURN RECEIPT

DOYLE HARTMAN

Oil Operator



March 29, 1996

Mr. Michael J. Stogner
Chief Hearing Officer
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: DOYLE HARTMAN
Britt-Laughlin "Com" No. 8
Britt Laughlin "Com" No. 2
Section 5, T-20-S, R-37-E
Lea County, New Mexico

Dear Mr. Stogner:

Reference is made to your letter to us dated March 26, 1996, regarding our application of February 2, 1996, for approval of an unorthodox well location and simultaneous dedication of our recently completed Britt-Laughlin No. 8 Eumont gas well situated 1980' FSL and 1980' FEL of Section 5, T-20-S, R-37-E, Lea County, New Mexico. In your letter of March 26, 1996, you stated that you had no record of an unorthodox location having been approved for our Britt-Laughlin "Com" No. 2 Eumont well (formerly Britt 'B' No. 2 well) and requested that we re-file our Britt-Laughlin "Com" No. 8 application to also include our Britt-Laughlin "Com" No. 2 well.

As to our February 2, 1996 application corresponding to our Britt-Laughlin "Com" No. 8 well, that application was a specific application intended for the Britt-Laughlin "Com" No. 8 well that was filed in accordance with the NMOCD's current Rule 104 for which required notice was given to both Texaco and Marathon as the two affected diagonal and/or adjacent Eumont operators. A signed waiver was subsequently received from Marathon approving the application and Texaco has never voiced an objection to our notice and application. Therefore, we respectfully request that an order be issued at this time corresponding to the specific matter of our Britt-Laughlin "Com" No. 8 application.

As to the separate matter of our Britt-Laughlin "Com" No. 2 well, please find enclosed a copy of NMOCD Order NSP-1050 dated June 1, 1977, corresponding to Union Texas Petroleum Corporation's Britt 'B' No. 2 (now Britt-Laughlin "Com" No. 2) replacement Eumont gas well, which NMOCD order recognized the location of the Britt 'B' No. 2 well to be at 330' FSL and 1650' FWL Section 5, T-20-S, R-37-E, and granted approval for the well to be produced as a replacement Eumont gas well. Prior to the subject order for the Britt 'B' No. 2 being granted, certified notice of Union Texas' application (copy enclosed) was provided to all offset operators, and since the approval date for Britt 'B' No. 2 well as a Eumont well, the Britt 'B' No. 2 well has remained classified for almost 19 years as a Eumont Gas Pool well.

Union Texas' notice and application of April 14, 1977 clearly discussed that the Britt 'B' No. 2 well was an oil-well plugback that was recompleted to the Eumont for the purpose of replacing the Britt "B" No. 1 Eumont gas well situated on the same Eumont tract. Union Texas' application further stated:

Page 2, Letter to NMOCD
March 29, 1996

The following information is submitted in support of this request:

1. *Form C-102*
2. *List of offset operators*
3. *Location Plat*
4. *Copy of certified letter of offset operators*

We would appreciate administrative handling of our application. However, if this should not be possible, please set it for hearing (emphasis added).

The C-102 form that was enclosed with and made a part of Union Texas' Certified Notice and Application gave notice that the recompleated Britt 'B' No. 2 well was to be a Eumont Gas Pool well productive from the Queen formation and clearly depicted that the well was situated at an unorthodox Eumont gas location consisting of "...330 feet from the South line and 1650 feet from the West line..." Union Texas' Certified Notice and Application of April 14, 1977 further requested that the subject matter be set for hearing in the event the application did not meet the requirements for administrative approval.

In light of the foregoing, we believe that Union Texas' original Certified Notice and Application placed all offset operators on notice that permission was being sought by Union Texas to produce the Britt 'B' No. 2 well as a Eumont Gas Pool well and also depicted the well as being located at an unorthodox Eumont Gas Pool location consisting of 330' FSL and 1650' FWL of Section 5, T-20-S, R-37-E, which fact is recognized by NMOCD order NSP-1050. However, if you believe the NMOCD's order of June 1, 1977 (authorizing the Britt 'B' No. 2 well to be produced as a Eumont well) is not fully adequate, we respectfully request that, in accordance with NMOCD policy and procedure, a *Nunc Pro Tunc* order be issued at this time that reflects Union Texas' original April 14, 1977 request for approval to produce the Britt 'B' No. 2 well situated 330' FSL and 1650' FWL Section 5 as a Eumont Gas Pool well, which *Nunc Pro Tunc* order should also recognize that the well has remained classified as a Eumont well for almost 19 years without objection from offset Eumont operators.

Very truly yours,

DOYLE HARTMAN, Oil Operator



Doyle Hartman

DH/mkc

Page 3, Letter to NMOCD
March 29, 1996

CC: Mr. James A. Davidson
Box 494
Midland, TX

Mr. Michael Condon
Mr. J. E. Gallegos
Gallegos Law Firm
460 St. Michaels Drive
Building 300
Santa Fe, NM 87505

Mr. Daniel S. Nutter
105 E. Alciante
Santa Fe, NM 87501

Mr. Steve Hartman
Mr. Don Mashburn
Mr. Jefferson Massey
Ms. Carolyn Sebastian
Ms. Linda Land
Ms. Cindy Brooks
DOYLE HARTMAN, Oil Operator
500 North Main
Midland, TX 79702

DATE August 24, 1977

NOTICE OF ASSIGNMENT OF ALLOWABLE TO A GAS WELL

The operator of the following well has complied with all the requirements of the Oil Conservation Commission and the well is hereby assigned an allowable as shown below.

Date of Connection 6/17/77 Date of First Allowable or Allowable Change 8/23/77
Purchaser Northern Natural Gas Co. Pool Eumont
Operator Union Texas Pet. Corp. Lease Britt "B"
Well No. 2 Unit Letter N Sec. 5 Twp. 20 Range 37
Dedicated Acreage 40 Revised Acreage _____ Difference _____
Acreage Factor .25 Revised Acreage Factor _____ Difference _____
Deliverability _____ Revised Deliverability _____ Difference _____
A x D Factor _____ Revised A x D Factor _____ Difference _____
Recompleted from oil _____ OCC District No. 1

CALCULATION OF SUPPLEMENTAL ALLOWABLE

MONTH	% OF MO.	PREV. ALLOW.	REV. ALLOW.	PREV. PROD.	REV. PROD.	REMARKS
January						
February						
March						
April						
May						
June						
July						
August			1089			
September			3629			
October						
November						
December						
TOTALS						
Previous Status Adjustments						
Allowable Production Difference						
July Schedule O/U Status						
Revised July O/U Status						
Effective In Oct. Schedule						
Current Classification Oil To N						

Note: All gas volumes are in MCF @ 15.025 psia.

JOE D. RAMEY, Secretary - Director

By [Signature]

DOYLE HARTMAN

Oil Operator

OIL CONSERVATION DIVISION
RECEIVED
APR 8 1996
8:52 AM

April 8, 1996

Mr. Michael J. Stogner
Chief Hearing Officer
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: DOYLE HARTMAN
Britt-Laughlin 'Com' No. 2
N-5-20S-37E
Lea County, New Mexico

Dear Mr. Stogner:

Reference is made to your letter to us of March 26, 1996, and also to our letter to the NMOCD of March 29, 1996, both regarding our reactivated Britt-Laughlin 'Com' No. 2 Eumont well situated 330' FSL and 1650' FWL Section 5, T-20-S, R-37-E, Lea County, New Mexico, which well was originally completed as a Monument Blinbry oil well in 1953 and then recompleted as a Eumont gas well in December, 1976.

In regard to the Britt-Laughlin 'Com' No. 2 well, we have performed further research and are enclosing for your review a copy of Exhibit No. 1 corresponding to NMOCD Examiner Hearing No. 9898, which exhibit was presented at the subject May 16, 1990 hearing for the purpose of depicting (1) our proposed 280-acre Britt-Laughlin 'Com' proration unit and (2) all existing and then proposed Eumont gas completions situated thereon. As can be seen from a review of Exhibit No. 1, three existing Eumont completions (including the Britt-Laughlin 'Com' No. 2 well) and a proposed new Eumont well (Britt-Laughlin 'Com' No. 6) were depicted as being situated on and a part of the proposed 280-acre Britt-Laughlin 'Com' proration unit.

In addition, also concerning the matter of the location of the Britt-Laughlin 'Com' No. 2 well, the Eumont Special Pool Rules in part reads as follows:

Any well drilled to and producing from the Eumont Gas Pool prior to August 12, 1954, at a location conforming with the spacing requirements effective at the time said well was drilled, shall be granted a tolerance not exceeding 330 feet with respect to the required distance from the boundary lines (emphasis added).

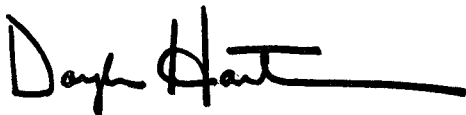
Letter to NMOCD
April 8, 1996, Page 2

Recognizing that the Britt-Laughlin 'Com' No. 2 Eumont well resulted from the recompletion of a well "...drilled prior to August 12, 1954, at a location conforming with the spacing requirements effective at the time said well was drilled...", when the Britt-Laughlin 'Com' No. 2 was plugged back and recompleted to the Eumont interval, and in conformance with then existing NMOCD practice, it qualified for a tolerance of "...330 feet with respect to the required distance from the boundary lines..." Therefore, upon application of the 330-foot tolerance historically allowed by the NMOCD for Eumont wells drilled to the Eumont Pool prior to August 12, 1954, the Britt-Laughlin 'Com' No. 2, when it was recompleted to the Eumont, fell within the setback tolerances allowed for Eumont wells on both 40-acre (660'-660') and 280-acre (660'-990') Eumont proration units.

If we can be of any further assistance, please let us know.

Very truly yours,

DOYLE HARTMAN, Oil Operator



Doyle Hartman

DH/mkc

CC: Mr. James A. Davidson
214 West Texas Avenue
Suite 710
Midland, TX 79701

Mr. Daniel S. Nutter
105 E. Alciante
Santa Fe, NM 87501

Mr. Michael Condon
Mr. J. E. Gallegos
Gallegos Law Firm
460 St. Michaels Drive
Building 300
Santa Fe, NM 87505

Mr. Steve Hartman
Mr. Don Mashburn
Mr. Jefferson Massey
Ms. Carolyn Sebastian
Ms. Linda Land
Ms. Cindy Brooks
DOYLE HARTMAN, Oil Operator
500 North Main
Midland, TX 79702

New Mexico Oil Conservation Division
Britt-Laughlin "Com" No. 2
May 13, 1996
Page 3

the June 1, 1977 Britt "B" No. 2 (Britt-Laughlin "Com" No. 2) Eumont order. As you are aware, Nunc Pro Tunc means "now for then", with a Nunc Pro Tunc entry being an entry that is made now for something actually previously done, to have the effect of the former date; that is, the purpose being not to supply an omitted action, but to supply an omission in the record of an action previously taken, but omitted through inadvertence or mistake.

Yours very truly,

DOYLE HARTMAN, Oil Operator



Doyle Hartman

rjr: stogner596
Enclosures

cc: Jerry Sexton, District 1 Supervisor
New Mexico Oil Conservation Division
P.O. Box 1980
Hobbs, NM 88241

Mr. James A. Davidson
214 West Texas Avenue
Suite 710
Midland, TX 79701

Mr. Richard L. Manus
U.S. Bureau of Land Management
P.O. Box 1778
Carlsbad, NM 88221-1778

Mr. Daniel S. Nutter
105 E. Alciante
Santa Fe, NM 87501

Mr. Michael J. Condon
Mr. J.E. Gallegos
Gallegos Law Firm
460 St. Michaels Drive, Bldg. 300
Santa Fe, NM 87505

Mr. Steve Hartman
Mr. Don Mashburn
Mr. Jefferson Massey
Ms. Carolyn Sebastian
Ms. Linda Land
Ms. Cindy Brooks
DOYLE HARTMAN, Oil Operator
500 North Main
Midland, TX 79702

Rand Carroll, Legal Counsel
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Armando Lopez, Asst. District Manager
U.S. Bureau of Land Management
1717 W. Second
Roswell, NM 88201

New Mexico Oil Conservation Division
Britt-Laughlin "Com" No. 2
May 13, 1996
Page 2

strative Eumont applications for each well being filed on the same day (April 14, 1977), from a review of each application, it can be ascertained that both applications are virtually identical, with the most significant difference in the applications being that Union Texas, as to its H.M. Britt No. 12 application, wanted to continue producing its already existing H.M. Britt No. 3 well in conjunction with its newly completed H.M. Britt No. 12 well and, as a consequence, the H.M. Britt application stated:

Therefore, we would like to request permission to produce both wells jointly for one monthly allowable based on a dedicated acreage of 320.

Both the Britt "B" No. 2 and H.M. Britt No. 12 Eumont applications further stated:

We would appreciate administrative handling of our application. However, if this should not be possible, please set it for hearing.

Neither application specifically stated that approval of an unorthodox location was being sought, but both applications did have enclosed therewith a C-102 that was made a part of the application, with the C-102 plats depicting each well to be at an unorthodox Eumont location.

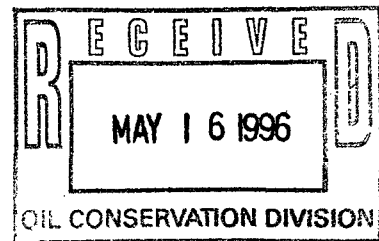
Finally, the subsequent NMOCD orders corresponding to each well were rendered within seven days of the other, with the Britt "B" No. 2 Eumont order being issued on June 1, 1977, and the H.M. Britt No. 12 Eumont order being granted June 8, 1977. From a review of the two NMOCD orders, the one significant difference between the two orders is that the H.M. Britt No. 12 order referenced that the H.M. Britt Nos. 3 and 12 Eumont wells were "... located at unorthodox locations in units G and C of said Section 7, respectively ..." Correspondingly, the Britt "B" No. 2 order simply stated that the Britt "B" No. 2 Eumont well was "... located 330 feet from the South line and 1650 feet from the West line of said Section 5 ..."

Therefore, since it is clearly apparent that the two April 14, 1977 Eumont administrative applications corresponding to the Britt "B" No. 2 Eumont well and the H.M. Britt No. 12 Eumont well were virtually identical applications, it is only reasonable to assume that the resulting orders should have been almost identical. Moreover, being that the H.M. Britt No. 12 Eumont order did reference that the H.M. Britt No. 12 well was situated at an "unorthodox" location, but the word "unorthodox" was not included in the Britt "B" No. 2 Eumont order, it is also reasonable to assume that the word "unorthodox" was inadvertently omitted from the Britt "B" No. 2 order.

Consequently, in recognition of the apparent inadvertent omission in 1977 of the word "unorthodox" from the Britt "B" No. 2 order, we again respectfully request that a Nunc Pro Tunc order be issued by the NMOCD so as to correct for the obvious inadvertent omission of the word "unorthodox" from

DOYLE HARTMAN

Oil Operator



May 13, 1996

Mr. Michael E. Stogner
Chief Hearing Officer/Engineer
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Unorthodox Eumont Location
Britt-Laughlin "Com" No. 2
(Formerly Britt "B" No. 2)
330' FSL and 1650' FWL (0)
Section 5, T-20-S, R-37-E
Lea County, New Mexico

Gentlemen:

Reference is made to our Britt-Laughlin "Com" No. 2 (formerly Britt "B" No. 2) Eumont gas well which is situated 330' FSL and 1650' FWL Section 5, T-20-S, R-37-E. Reference is also made to NMOCD administrative order NSP-1050 dated June 1, 1977, which granted approval to Union Texas Petroleum to operate the well as a Eumont gas well.

In your letter to us of March 26, 1996, concerning our unorthodox gas well location application for our Britt-Laughlin "Com" No. 8 well, you stated:

It would appear there is currently no order by the Division authorizing approval for the unorthodox Eumont gas well location for the Britt-Laughlin Com Well No. 2 (API No. 30-025-05924) located 330 feet from the South line and 1650 feet from the West line (Unit N) of Section 5, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico . . .

In this regard, please find enclosed herewith a copy of two separate administrative applications (complete with NMOCD orders) that were filed by Union Texas Petroleum Corporation on April 14, 1977. The two subject Union Texas Eumont wells for which administrative applications were filed are our Britt-Laughlin Com No. 2 (formerly Britt "B" No.2) well situated 330' FSL and 1650' FWL of Section 5, T-20-S, R-37-E and Meridian's H.M. Britt No. 12 well situated 330' FNL and 2281' FWL of Section 7, T-20-S, R-37-E. Both Eumont wells were recompletions (plugbacks from deeper oil pools) that were performed by Union Texas in early 1977 and, which were situated at unorthodox Eumont gas well locations. However, the similarity doesn't end there. In addition to the admini-



OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO

P. O. BOX 2088 - SANTA FE

87501



DIRECTOR
JOE D. RAMEY

LAND COMMISSIONER
PHIL R. LUCERO

STATE GEOLOGIST
EMERY C. ARNOLD

June 1, 1977

Allied Chemical
Union Texas Petroleum Division
1300 Wilco Building
Midland, Texas 79701

Attention: Stanley A. Post

Administrative Order NSP-1050

Gentlemen:

Reference is made to your application for approval of a 40-acre non-standard gas proration unit in the Eumont Gas Pool consisting of the following acreage:

LEA COUNTY, NEW MEXICO
TOWNSHIP 20 SOUTH, RANGE 37 EAST, NMPM
Section 5: SE/4 SW/4

It is my understanding that this unit is to be dedicated to your Britt "B" Well No. 2 located 330 feet from the South line and 1650 feet from the West line of said Section 5.

By authority granted me under the provisions of Rule 104 D II, you are hereby authorized to operate the above-described acreage as a non-standard unit.

Very truly yours,

JOE D. RAMEY,
Secretary-Director

JDR/JEK/dr

cc: Oil Conservation Commission - Hobbs
Oil & Gas Engineering Committee - Hobbs
Proration Dept., OCC - Santa Fe

DISTRIBUTION	
SANTA FE	
FILE	
U.S.G.S.	
LAND OFFICE	
TRANSPORTER	OIL
	GAS
OPERATOR	
PRODUCTION OFFICE	
Operator	

NEW MEXICO OIL CONSERVATION COMMISSION
REQUEST FOR ALLOWABLE
AND
AUTHORIZATION TO TRANSPORT OIL AND NATURAL GAS

Form C-104
Supersedes Old C-104 and C-11
Effective 1-1-55

UNION TEXAS PETROLEUM CORPORATION
Address
1300 Wilco Building, Midland, Texas 79701

Reason(s) for filing (Check proper box)
New Well ☐ Change in Transporter of:
Completion ☒ Oil ☐ Dry Gas ☐
Change in Ownership ☐ Casinghead Gas ☐ Condensate ☐

Other (Please explain)

Change of ownership give name and address of previous owner

DESCRIPTION OF WELL AND LEASE

Lease Name Britt "B"	Well No. 2	Pool Name, including Formation Eumant (Queen)	Kind of Lease State, Federal or Fee Federal	Lease No. LC 031621-B
-------------------------	---------------	--	---	--------------------------

Location
Unit Letter N : 330 Feet From The South Line and 1650 Feet From The West
Line of Section 5 Township 20-S Range 37-E , NMPA, Lea County

DESIGNATION OF TRANSPORTER OF OIL AND NATURAL GAS

Name of Authorized Transporter of Oil <input type="checkbox"/> or Condensate <input checked="" type="checkbox"/> Shell Pipeline Company	Address (Give address to which approved copy of this form is to be sent) Box 1910, Midland, Texas 79701
Name of Authorized Transporter of Casinghead Gas <input type="checkbox"/> or Dry Gas <input checked="" type="checkbox"/> Northern Natural Gas Company	Address (Give address to which approved copy of this form is to be sent) Box 2300, Midland, Texas 79701

Does well produce oil or liquids, give location of tanks. Unit N Sec. 5 Twp. 20-S Range 37-E Is gas actually connected? Yes When 6-24-77

this production is commingled with that from any other lease or pool, give commingling order number:

COMPLETION DATA

Designate Type of Completion - (X) Oil Well <input type="checkbox"/> Gas Well <input checked="" type="checkbox"/> New Well <input type="checkbox"/> Workover <input checked="" type="checkbox"/> Deepen <input type="checkbox"/> Plug Back <input type="checkbox"/> Same Res't. <input type="checkbox"/> Diff. Res't. <input checked="" type="checkbox"/>	Date Spudded 3-27-53	Date Compl. Ready to Prod. 12-16-76	Total Depth 5711 Original	P.B.T.D. 3490'
Levations (DF, KKB, RT, GR, etc.) 3545' DF	Name of Producing Formation Queen	Top Oil Gas Pay 3155'	Tubing Depth 3302	Depth Casing Shoe

Information: With 1 JSPF 3155-3160, 3170-3182, 3190-3200, 3235-3245' (Total 41 holes)

TUBING, CASING, AND CEMENTING RECORD			
HOLE SIZE	CASING & TUBING SIZE	DEPTH SET	SACKS CEMENT
NA	13 3/8"	604'	550 Sx.
NA	8 5/8"	2999'	1500 Sx.
7 7/8"	5 1/2"	5710'	600 Sx.
--	2 3/8" thg.	3302'	--

TEST DATA AND REQUEST FOR ALLOWABLE II. WELL (Test must be after recovery of total volume of load oil and must be equal to or exceed top allowable for this depth or be for full 24 hours)

Date First New Oil Run To Tanks	Date of Test	Producing Method (Flow, pump, gas lift, etc.)	
Length of Test	Tubing Pressure	Casing Pressure	Choke Size
Actual Prod. During Test	Oil-Bbls.	Water-Bbls.	Gas-MCF

AS WELL

Actual Prod. Test-MCF/D 630	Length of Test 24 hrs.	Bbls. Condensate/MMCF 0	Gravity of Condensate
Testing Method (pilot, back pr.) --	Tubing Pressure (Shut-in) --	Casing Pressure (Shut-in) 517	Choke Size ---

CERTIFICATE OF COMPLIANCE

I hereby certify that the rules and regulations of the Oil Conservation Commission have been complied with and that the information given above is true and complete to the best of my knowledge and belief.

Stacy A. Post
(Signature)
Sr. Prod. Analyst
(Title)
August 16, 1977
(Date)

OIL CONSERVATION COMMISSION
APPROVED Aug 24 1977, 19
BY Robert A. Deaton
TITLE Commissioner

This form is to be filed in compliance with RULE 1104.
If this is a request for allowable for a newly drilled or deepened well, this form must be accompanied by a tabulation of the deviation tests taken on the well in accordance with RULE 111.
All sections of this form must be filled out completely for allowable on new and recompleted wells.
Fill out only Sections I, II, III, and VI for changes of owner, well name or number, or transporter or other such change of condition.
Separate Forms C-104 must be filed for each pool in multiply completed wells.

DATE August 24, 1977

NOTICE OF ASSIGNMENT OF ALLOWABLE TO A GAS WELL

The operator of the following well has complied with all the requirements of the Oil Conservation Commission and the well is hereby assigned an allowable as shown below.

Date of Connection 6/17/77 Date of First Allowable or Allowable Change 8/23/77
Purchaser Northern Natural Gas Co. Pool Eumont
Operator Union Texas Pet. Corp. Lease Britt "B"
Well No. 2 Unit Letter N Sec. 5 Twp. 20 Range 37
Dedicated Acreage 40 Revised Acreage _____ Difference _____
Acreage Factor .25 Revised Acreage Factor _____ Difference _____
Deliverability _____ Revised Deliverability _____ Difference _____
A x D Factor _____ Revised A x D Factor _____ Difference _____
Recompleted from oil _____
Signature: *James Sexton* OCC District No. 1

CALCULATION OF SUPPLEMENTAL ALLOWABLE

MONTH	% OF MO.	PREV. ALLOW.	REV. ALLOW.	PREV. PROD.	REV. PROD.	REMARKS
January						
February						
March						
April						
May						
June						
July						
August			1089			
September			3629			
October						
November						
December						
TOTALS						
Previous Status Adjustments						
Allowable Production Difference						
July Schedule O/U Status						
Revised July O/U Status						
				Effective In	Oct.	Schedule
				Current Classification	Oil	To N

Note: All gas volumes are in MCF @ 15.025 psia.

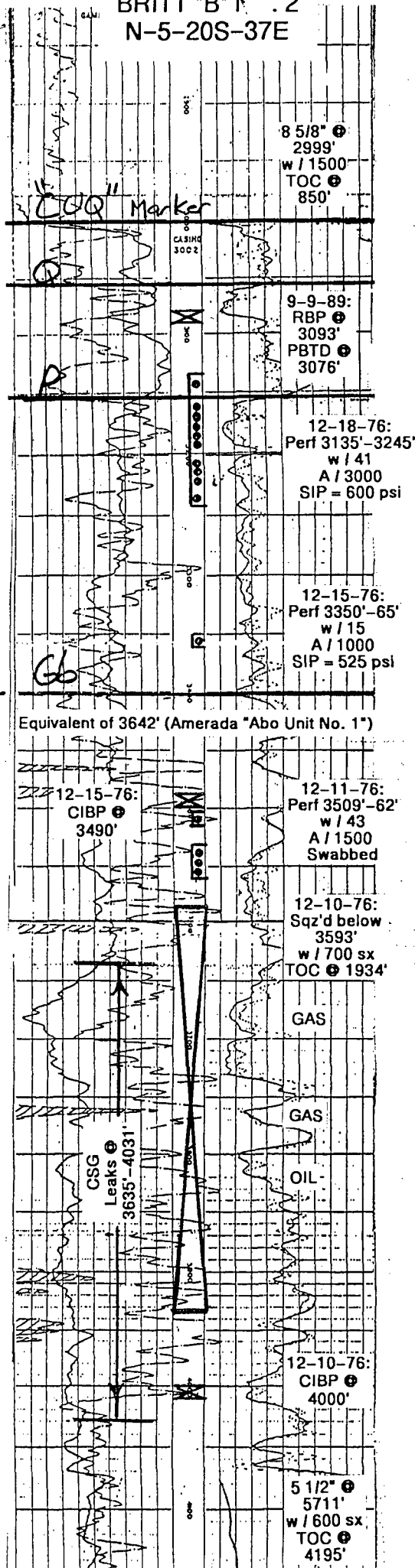
JOE D. RAMEY, Secretary - Director

By *[Signature]*

BRITT "B" M .2
N-5-20S-37E

Hartman, Davidson, et al
100% of Eumont

Amerada Hess
41.6667% of Eunice Monument



COMPANY Union Texas Petroleum
(Anderson Prichard)
WELL Britt "B" No. 2
FIELD Eumont/Monument Paddock-Blinebry
LOCATION 330' FSL & 1650' FWL (N)
Sec. 5, T-20-S, R-37-E
COUNTY Lea
STATE New Mexico
ELEVATIONS: KB _____
DF _____
GL 3560'

COMPLETION RECORD

SPUD DATE 3-27-53 COMP. DATE 5-21-53
TD 5711 PBTD _____

CASING RECORD:

13 3/8\"/>

COMP. INTERVAL Perf 5665 - 5690
(Blinebry)

STIMULATION A/500

POT. IPF = 416 BOPD (Blinebry)

GOR _____ GR _____
TP _____ CP _____
CHOKE _____ TUBING _____

REMARKS

9/29/55: CIBP@ 5354 + 2 sx
cmf. Perf 5175-5230 w/43sf.
IPF = 66 BOPD (Paddock).

11/29/62: Holes in 5 1/2\"/>

12/76: Set retainer @ 5078'.
Tested 5 1/2\"/>

9/9/89: RBP@ 3093' plus 2 sx
of 20/40 sd on top. PBTD@
3076' RKB. Well T&A'd.

Britt B No. 2 Monthly Production

Britt B #2 Gas

40
30
20
10

Britt B #2 WHSIP

700
600
500
400
300
200
100

Britt B #2 Cum

900
800
700
600
500
400
300
200
100

1978 1979 1980 1981 1982 1983 1984 1985 1986 1987 1988 1989 1990 1991 1992 1993 1994 1995