OIL CONSERVATION DIVISION RECEIVED

'94 APH 20 AM 8 50



April 18, 1994

Mr. William Lemay New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

Re: Application for Administrative Approval Unorthodox Gas Well Location Eddy County, New Mexico

Dear Mr. Lemay

Yates Energy Corporation is the operator of S/2, Sec 12, T-22-S, R-25-E and proposes to drill the McGruder Hill 12 Federal Com #1 to the Morrow formation at a location 330' from the west line and 1680' from the south line of said Section 12.

The original location was to be staked 660' from the west line but was moved by Bureau of Land Management personnel due to a steeply sloping hill.

Therefore, Yates Energy respectfully requests that the Division Director grant an exception to Rule 104 B.I.(a) without hearing based on topographical conditions as allowed under the Rules and Regulations of the State of New Mexico Oil Conservation Division.

Attached please find a plat showing the ownership of all offsetting leases. All offset Operators have been notified and requests for waivers sent. All waiver letters will be forwarded to you upon receipt. Also attached is a plat showing the existing topographical conditions.

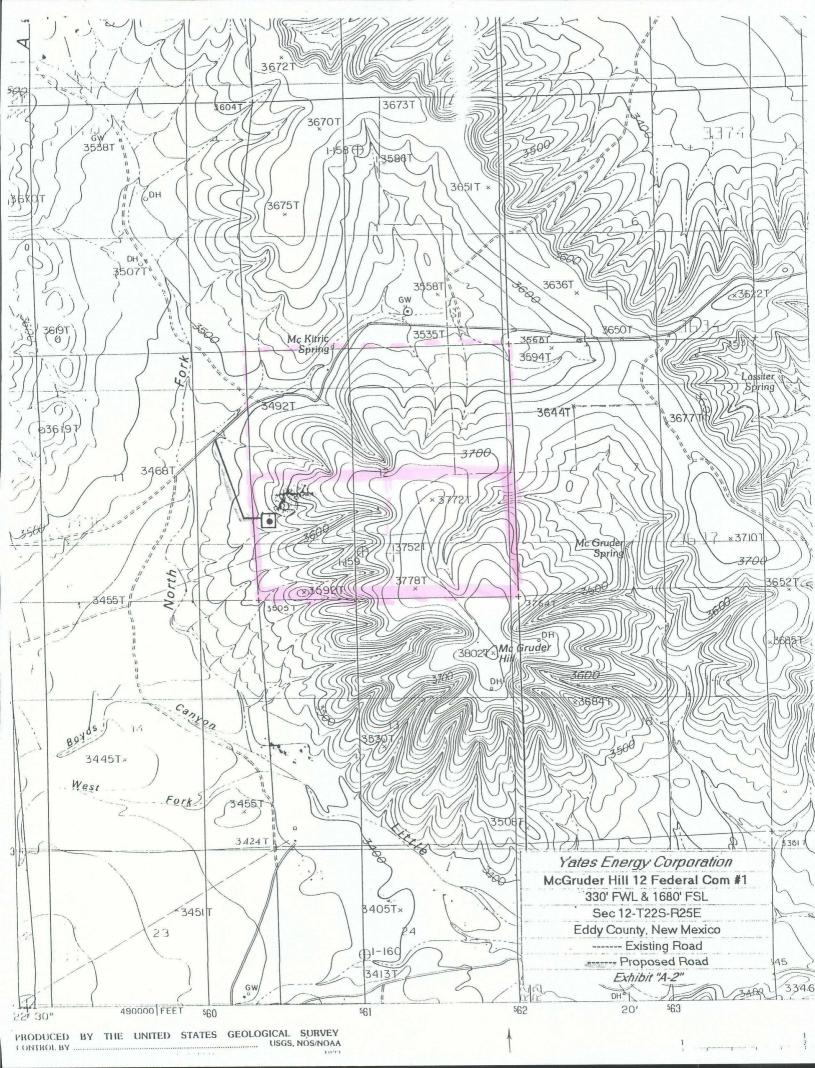
Your favorable consideration and assistance in this matter is greatly appreciated.

Very truly yours, YATES ENERGY CORPORATION

Kirk Ross Engineer

Enclosure

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STATE OF NEW MEXICO



F'NERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

June 3, 1994

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87504 (505) 827-5800

Yates Energy Corporation P. O. Box 2323 Roswell, New Mexico 88202

Attention: Kirk Ross

RE: Administrative Application for an Unorthodox Gas Well Location.

McGruder Hill "12" Federal Com Well No. 1; 1680'FSL-330'FWL (Unit L) of Section 12, Township 22 South, Range 25 East, NMPM, Undesignated Revelation Morrow Gas Pool, Eddy County, New Mexico.

Dear Mr. Ross:

The subject application dated April 18, 1994 cannot be approved at this time due to insufficient data.

Please provide *all applicable* information and supporting data pursuant to Division Memorandum 1-90 (see copy attached).

Further, the original location for the subject well being 660 feet from the West line of said Section 12 was unorthodox to begin with. Please explain why this particular location was initially chosen over a more favored location that is considered to be standard.

Should you have any questions or comments concerning these rules, requirements and/or procedures after you have reviewed them, please contact me at (505) 827-5811.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: Oil Conservation Division - Artesia

U. S. Bureau of Land Management - Carlsbad



June 20, 1994

New Mexicó Oil Conservation Division Attn: Michael Stogner P.O. Box 2088 Santa Fe, New Mexico 87501

Re: Application for Administrative Approval Unorthodox Gas Well Location McGruder Hill "12" Federal Com #1 Sec 12, T-22-S, R-25-E Eddy County, New Mexico

Dear Mr. Stogner:

As per your letter, dated June 3, 1994 and per our phone conversation of today, attached is additional information concerning our application for an administrative approval of the unorthodox location for the subject well.

For your information, this well was originally to be drilled in 1990. The well was proposed to be drilled as a standup 320 acre unit covering the W/2 of Section 12. The location at 1980' FSL and 660' FWL was a standard location. Santa Fe Energy Partners, L.P., our partner and acting for the operator, had applied for a hearing for compulsory pooling under case #9939, to be heard May 30, 1990. This case was withdrawn after a meeting with the BLM which had concerns about severing the NW/4 of Section 12 from the existing Hackberry Hills Unit, and that a laydown 320 covering the S/2 of the section would be more appropriate under the circumstances. In the meantime, the surface had been surveyed and the location was determined to be unacceptable due to topographic reasons and the location was moved to the present location of 330' FWL and 1680' FSL. I have enclosed copies of correspondence between the BLM and YEC concerning this matter.

In my application letter of April 18, 1994, I had forgotten the standup/laydown changes and thought that I could get administrative approval based on the topographic reasons only. Geologically, we would prefer to drill the well in the SW/4 of the section. The topography of the section does not allow us to drill a standard location in this 1/4 section. I have included an enlarged topographic map showing the proposed location and the orthodox drilling windows. A standard location from the SE/4 would have to be drilled directionally. Due the additional costs involved,

the economics do not favor this alternative. I have enclosed net pay maps showing the geology of the 3 prospective pay zones. The main pay is the Upper Penn Canyon C-3, which is the zone that the Hackberry Hills Unit #1 in Section 1 produces. The other pay zone is the Upper Penn Canyon C-2. Both of these prospective pay zones favor a location in the SW/4. Another prospective pay zone is the Morrow C & D sands which could be developed at any standard location in the S/2. To target all three pay zones, YEC requests the approval of the unorthodox location.

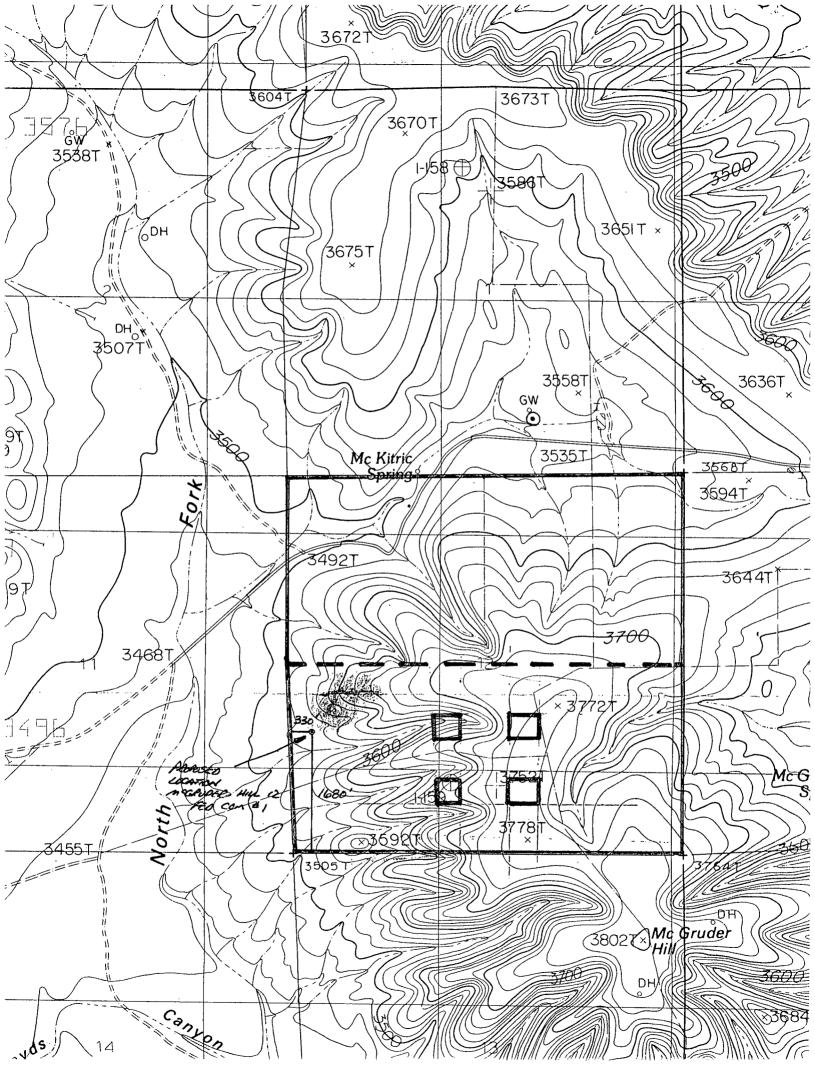
Also enclosed are waiver letters from all offset operators, indicating their acceptance of the unorthodox location. A map showing the offset ownership is also included.

We respectfully request that this application be reviewed and that an administrative approval be considered. If approval by those means are not granted, we are prepared to go to hearing. It is our understanding that you have placed this matter on the Docket for a July 21, 1994 hearing date if necessary.

Very truly yours,
YATES ENERGY CORPORATION

Kirk Ross Engineer

Enclosure



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Form 3160-3 (December 1990) SUBMIT IN TRIPLICATE.

(Other instructions on reverse side)

Form approved. Budget Bureau No. 1004-0136 Expires: December 31, 1991

UNITED STATES DEPARTMENT OF THE INTERIOR

5. LEASE DESIGNATION AND BEBIAL NO. BUREAU OF LAND MANAGEMENT

APPLICATION FOR PER	RMIT TO DR	ILL OR DEEPEN		G. IF INDIAN, ALLOTT	TEE OR TRIBE NAME
B. TYPE OF WORK DRILL	DEEPEN			7. UNIT AGREEMENT	NAMB
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				9. API WELLING.	LL 12 FED. C
YATES ENERGY CORPORATION ADDRESS AND TELEPHONE NO.				1 1	
P.O. BOX 2323, ROSWELL, NM 88	2002 505-62	3-4935		10. FIELD AND POOL	. OR WILDCAT
LOCATION OF WELL (Report location clearly and in	accordance with a			WILDCAT	,
At surface		,		11. SEC., T., R., M., O	R BLK.
330' FWL & 1680' FSL At proposed prod. zone				AND SURVEY OR	AREA
SAME				Sec 12-T22S	S-R25E
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7 Miles West of Carlsbad				EDDA	1 MW
O. DISTANCE FROM PROPOSED* LOCATION TO NEAREST	16	NO. OF ACRES IN LEASE		OF ACRES ASSIGNED	
PROPERTY OR LEASE LINE, FT. (Also to nearest drig, unit line, if any)	·	86.57	10 1	332.7 ⁴	4
8. DISTANCE PROM PROPOSED LOCATIONS	18	PROPOSED DEPTH	20. ROT	ARY OR CABLE TOOLS	
TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT.	A .	11,200	Ro	otary	
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(This space for Federal or State office use)		APPROVAL DATE			l subject to Requirem ents
Application approval does not warrant or certify that the appl	icant holds legal or equi	table title to those rights in the sui	oject lease which	would entitle sie England	STIPHLATIONS
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*See Instructions On Reverse Side

Submit to Appropriate District Office Pee Lease - 3 copies

State of New Mexico ginergy, Minerals and Natural Resources Department

Form C-102 Revised 1-1-89

RONALD J. EIDSON,

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DISTRICT | 20. Box 1980, Hobbs, NM 88240

ISTRICT II P.O. Drawer DD, Artesia, NM 88210

OIL CONSERVATION DIVISION P.O. Box 2088

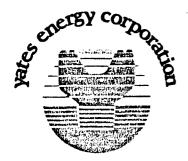
Santa Fe, New Mexico 87504-2088

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section Operator Well No YATES ENERGY CORP. McGruder Hill 12 Fed. Comm Township Unit Letter Section 12 25 East 22 South Eddy **NMPM** Actual Footage Location of Well: 1680 South 330 West line and feet from the line feet from the Ground level Elev. **Producing Formation** Dedicated Acreage: vii b 3538.2 Morrow Und. Wildcat (Morrow) 332.74 Acres 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interest of all owners been consolidated by communitization, unitization, force-pooling, etc.?

Force pooling application pending, unitization, force-pooling, etc.? If answer is "yes" type of consolidation to be comminitized if productive Yes If answer is "no" list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if neccessary. No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interest, has been approved by the Division. **OPERATOR CERTIFICATION** I hereby certify that the information contained herein in true and complete to the best of my knowledge and belief. Signature Printed Name Sharon R. Hamilton Position Landman Company Yates Energy Corporation Date ' 7/13/90 SURVEYOR CERTIFICATION I hereby certify that the well location shows V - 3170on this plat was plotted from field notes of actual surveys made by me or under my il. supervison, and that the same is true and 3552.7 correct to the best of my knowledge and **3\$**0'∙0 belief. 3532.1 Date Surveyed June 14, 1990 Signature & Seal of Professional Surveyor 689 NM-63329 NM-83041 LC-064528-A



June 11, 1990

Berry Hunt Bureau of Land Management P. O. Box 1778 Carlsbad. New Mexico 88220

Re: Notice of Staking
Pussyfoot "12" Federal Com #1
Section 12-22S-25E
Eddy County, NM

Dear Berry,

Enclosed please find the Notice of Staking for the captioned well (formerly Kitipaw Federal Com #1) said location to be 330' FWL & 1680' FSL, the alternate location suggested after your field inspection of May 31, 1990.

A meeting was held this date with Armondo Lopez of the Roswell BLM, he indicated that this location would be accepted for a laydown communitized proration unit.

Pursuant to your request, your office will be notified when said location has been surveyed, to schedule another field inspection.

As previously requested, please provide us with a letter stating that the original location of 1980' FSL and 660' FWL was unacceptable due to the topographic reasons. Evidently, at a recent OCD hearing they indicated that they preferred written confirmation as opposed to verbal notice.

Your assistance is appreciated.

Yours very truly,

YATES ENERGY CORPORATION

Sharon R. Hamilton Landman

cc: Dub Gray
Blanco Engineering
P. O. Box 348
Artesia, NM 88210

RECEIVED JUN 2 8 1990



United States Department of the Interior



BUREAU OF LAND MANAGEMENT CARLSBAD RESOURCE AREA HEADQUARTERS P.O. BOX 1778 CARLSBAD, NEW MEXICO 88220

JUN 2 7 1990

GR# 6655 3160 (067)

Yates Energy Corporation P.O. Box 2323 Roswell, NM 88202-2323

RE: Relocation of the Pussyfoot 12 Fed. Com. #1 to an unorthodox location

Gentlemen:

On June 6, 1990, Barry Hunt from our office and Dub Gray, representing Yates Energy, completed a field exam on the Pussyfoot 12 Fed. Com. #1 at 1980 feet from the south line and 660 feet from the west line in section 12, T. 22 S., R. 25 E.

Due to the amount of cut and fill requiring blasting of limestone hills, the location was relocated to the southwest quarter of section 12 at 1680 feet from the south line and 330 feet from the west line. This small, fairly flat spot is acceptable to the BLM and the operator. The only other alternatives were to move to section 11 and directional drill, or move to the southeast quarter of section 12.

The BLM has the right to require a move of this nature in accordance with 43 CFR 3101.1-2, surface use rights. If you require any additional information or need any further assistance in filing with the NMOCD for the unorthodox spacing, please feel free to contact us.

Sincerely,

M Richard L. Manus Area Manager

lockets Mos. 16-90 and 17-90 are tentatively for June 13, 1990 and June 27, 1990. Applications for hearing must be filed at least 12 days in advance of hearing date.

DOCKET: EXAMINER HEARING - WEDNESDAY - MAY 30, 1990

RECEIVED MAY 1 8 1990

8:15 A.M. - OIL CONSERVATION DIVISION CONFERENCE ROOM, STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO

The following cases will be heard before David R. Catanach, Examiner, or Michael E. Stogner, Alternate Examiner:

CASE 9937: (Continued from May 16, 1990, Examiner Hearing.)

> Application of Exxon Corporation for a unit agreement, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks approval of the Laguna Salado South Unit Agreement for an area comprising 7040 acres, more or less, of State, Federal and Fee lands in all or portions of Sections 10, 15, 16, 21, 22, 23, 26, 27, 28, 33, 34 and 35, Township 23 South, Range 29 East. This area is located approximately 7 miles east of Loving, New Mexico.

CASE 9939: (Continued and Readvertised)

> Application of Santa Fe Energy Operating Partners, L. P. for compulsory pooling and a non-standard gas proration unit, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying Lots 4 through 7 and the NW/4 (W/2 equivalent) of Irregular Section 12, Township 22 South, Range 25 East, forming a non-standard 332.74-acre gas spacing and proration unit for any and all formations and/or pools within said vertical extent developed on 320-acre spacing, which presently includes but is not necessarily limited to the Undesignated Catclaw Draw-Wolfcamp Gas Pool, Undesignated McKittrick Canyon-Upper Pennsylvanian Gas Pool, Undesignated Hackberry Hills-Canyon Gas Pool, Undesignated Happy Valley-Morrow Gas Pool and/or the Revelation-Morrow Gas Pool. Said unit is to be dedicated to a well to be drilled at a standard gas well location 1980 feet from the South line and 660 feet from the West line (Unit L) of said Section 12. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said unit is located approximately 7 miles west by south of Carlsbad. New Mexico.

Application of Mobil Producing Texas and New Mexico, Inc. for an unorthodox oil well location, Lea County, New Mexico. Applicant, in the above-styled cause, seeks approval for an unorthodox oil well location for its proposed Bridges State CASE 9945: Well No. 601 to be drilled 1600 feet from the North line and 2600 feet from the West line (Unit F) of Section 25, Township 17 South, Range 34 East, to test both the Vacuum-Glorieta and Vacuum-Blinebry Pools. Said well is to be dedicated to an existing 40-acre oil spacing and proration unit for each zone comprising the SE/4 NW/4 of said Section 25. The Blinebry zone is presently dedicated to the applicant's Bridges State Well No. 11 located 1980 feet from the North and West lines and the Glorieta zone is presently dedicated to the applicant's Bridges State Well No. 111 located 2310 feet from the North line and 1860 feet from the West line of said Section 25. Said unit is located approximately 2/4 miles west-northwest of Buckeye, New Mexico.

Application of Mobil Producing Texas and New Mexico, Inc. for an unorthodox oil well location, Lea County, New Mexico. CASE 9946: Applicant, in the above-styled cause, seeks approval for an unorthodox oil well location for its proposed Bridges State Well No. 602 to be drilled 1460 feet from the North line and 1260 feet from the West line (Unit E) of Section 25, Township 17 South, Range 34 East, to test both the Vacuum-Glorieta and Vacuum-Blinebry Pools. Said well is to be dedicated to an existing 40-acre oil spacing and proration unit for each zone comprising the SW/4 NW/4 of said Section 25. The Blinebry zone is presently dedicated to the applicant's Bridges State Well No. 13 located 1980 feet from the North line and 660 feet from the West line and the Glorieta zone is presently dedicated to the applicant's Bridges State Well No. 103 located 2310 feet from the North line and 660 feet from the West line of said Section 25. Said unit is located approximately 3/4 mile west-northwest of Buckeye, New Mexico.

CASE 9925: (Continued from May 2, 1990, Examiner Hearing.)

> Application of Mewbourne Oil Company for compulsory pooling and an unorthodox gas well location, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the following described acreage in Section 21, Township 18 South, Range 27 East, and in the following described manner: the N/2 to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within said vertical extent (which presently includes but is not necessarily limited to the Undesignated Red Lake-Pennsylvanian Gas Pool, Undesignated Red Lake Atoka-Morrow Gas Pool, and Undesignated Scoggin Draw-Morrow Gas Pool); the NE/4 to form a standard 160-acre gas spacing and proration unit for any and all formations developed on 160-acre spacing within said vertical extent; and the NE/4 NE/4 to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on statewide 40-acre oil spacing (which presently includes but is not necessarily limited to the Undesignated Artesia Queen-Grayburg-San Andres Pool, Undesignated East Dayton-Grayburg Pool and Undesignated Empire-Abo Pool). Said units are to be dedicated to a single well to be drilled at a location 660 feet from the North and East lines (Unit A) of said Section 21, being a standard location for zones spaced on 40 and 160 acres and unorthodox for zones spaced on 320 acres. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 6.5 miles south by east of Riverside, New Mexico.

CASE 9924: (Continued from May 16, 1990, Examiner Hearing.)

> Application of Strata Production Company to amend Division Order No. R-9097, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks to amend Division Order No. R-9097, which authorized a horizontal directional drilling pilot project in the SE/4 of Section 18, Township 26 South, Range 25 East, being a standard 160-acre gas spacing and proration unit in the Bone Spring formation by expanding the prescribed area limiting the horizontal displacement of the proposed wellbore such that any portion thereof can be no closer than 330 feet from the North line, nor closer than 660 feet from the East and West lines, nor closer than 460 feet from the South line of said 160-acre tract. Said location is approximately 2.5 miles east of Mile Post No. 6 on U.S. Highway 62/180.

As an offset operator,						
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Energy Corporation to drill i						
at a location of 330' FWL and						
25-E, Eddy County, New Mexico					pacing	and
proration unit comprising the	south	halfo	f Section	n 1/2.		
	By:	Will	Joj	m	1	
,	-	W. Bret	t Smith/V	ce Pre	esident	
	Compar	ny: Co	llins & Wa	are, Ir	ıc.	
	Date:	4	- 20-0	74		

As an offset operator, Mewboune Oil Companyaives any objection before the New Mexico Conservation Division for Yates Energy Corporation to drill it's McGruder Hill 12 Federal Com #1 at a location of 330' FWL and 1680' FSL of Section 12, T-22-S, R-25-E, Eddy County, New Mexico, for a 332.74 acre gas spacing and proration unit comprising the south half of Section 12.

By: Sen Warts

company: Menbourne Oil Co.

Date: 5/4/94

As an offset operator, MARALO, INC. waives any objection before the New Mexico Conservation Division for Yates Energy Corporation to drill it's McGruder Hill 12 Federal Com #1 at a location of 330' FWL and 1680' FSL of Section 12, T-22-S, R-25-E, Eddy County, New Mexico, for a 332.74 acre gas spacing and proration unit comprising the south half of Section 12.

Ву: __

R. A. Lowery, Production Manager

Company: MARALO INC.

Date: 3/17/9

As an offset operator, Santa Fe Energy Oper. Partners, LP waives any objection before the New Mexico Conservation Division for Yates Energy Corporation to drill it's McGruder Hill 12 Federal Com #1 at a location of 330' FWL and 1680' FSL of Section 12, T-22-S, R-25-E, Eddy County, New Mexico, for a 332.74 acre gas spacing and proration unit comprising the south half of Section 12.

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As an offset operator, <u>ENNZOL ATROLEUM (MANY</u> waives any objection before the New Mexico Conservation Division for Yates Energy Corporation to drill it's McGruder Hill 12 Federal Com #1 at a location of 330' FWL and 1680' FSL of Section 12, T-22-S, R-25-E, Eddy County, New Mexico, for a 332.74 acre gas spacing and proration unit comprising the south half of Section 12.

By:

SENIOR LANDMAN

Company: PENNION PETROLEUM COMPANY

Date: 6-20.94

June 22, 1994

Mr. Kirk Ross Yates Energy Corporation P.O. Box 2323 Roswell, New Mexico 88202



RE: Unorthodox Well Location

McGruder Hill "12" Fed Com Well No. 1

Eddy County, New Mexico

Dear Mr. Ross:

As an offset operator, Mitchell Energy Corporation waives any objection before the New Mexico Conversation Division for Yates Energy Corporation to drill its McGruder Hill 12 Federal Com #1 at a location of 330' FWL and 1680' FSL of Section 12, T-22-S, R-25-E, Eddy County, New Mexico, for a 332,74 acre gas spacing and proration unit comprising the south half of Section 12.

Very truly yours,

MITCHELL ENERGY CORPORATION

Mark N. Stephenson

Manager, Production Regulatory Affairs

MNS:mw YECWaiv.mns

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(R-6923, 3-9-82) Ext: 1/2 Sec 16; (R-8724, 7-16-81) Fxt: 5/2 Sec 20

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Form 3160-3 (December 1990)

* GENERAL USL MARNIAL

NM OIL CONS. COMMISSION

ARTESIA, NO 08210 UNITED STATES

DEPARTMENT OF THE INTERIOR

SUBMIT (IN STRIPLICATES OF Form approved.

(Other instructions on reverse side); VED Expires: December 31, 1991

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*See Instructions On Reverse Side

Submit to Appropriate District Office State Lease - 4 copies Fee Lease - 3 copies

State of New Mexico

Form C-102 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT II P.O. Drawer DD, Artesia, NM 88210

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section

	NERGY CORP.		1	McGruder	Hill 12	Fed. Co	omm	Well No.	
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CMD : OG5SECT

ONGARD INQUIRE LAND BY SECTION

06/03/94 13:25:12 OGOMES -EMFP PAGE NO: 1

Sec : 12 Twp : 22S Rng : 25E Section Type : NORMAL

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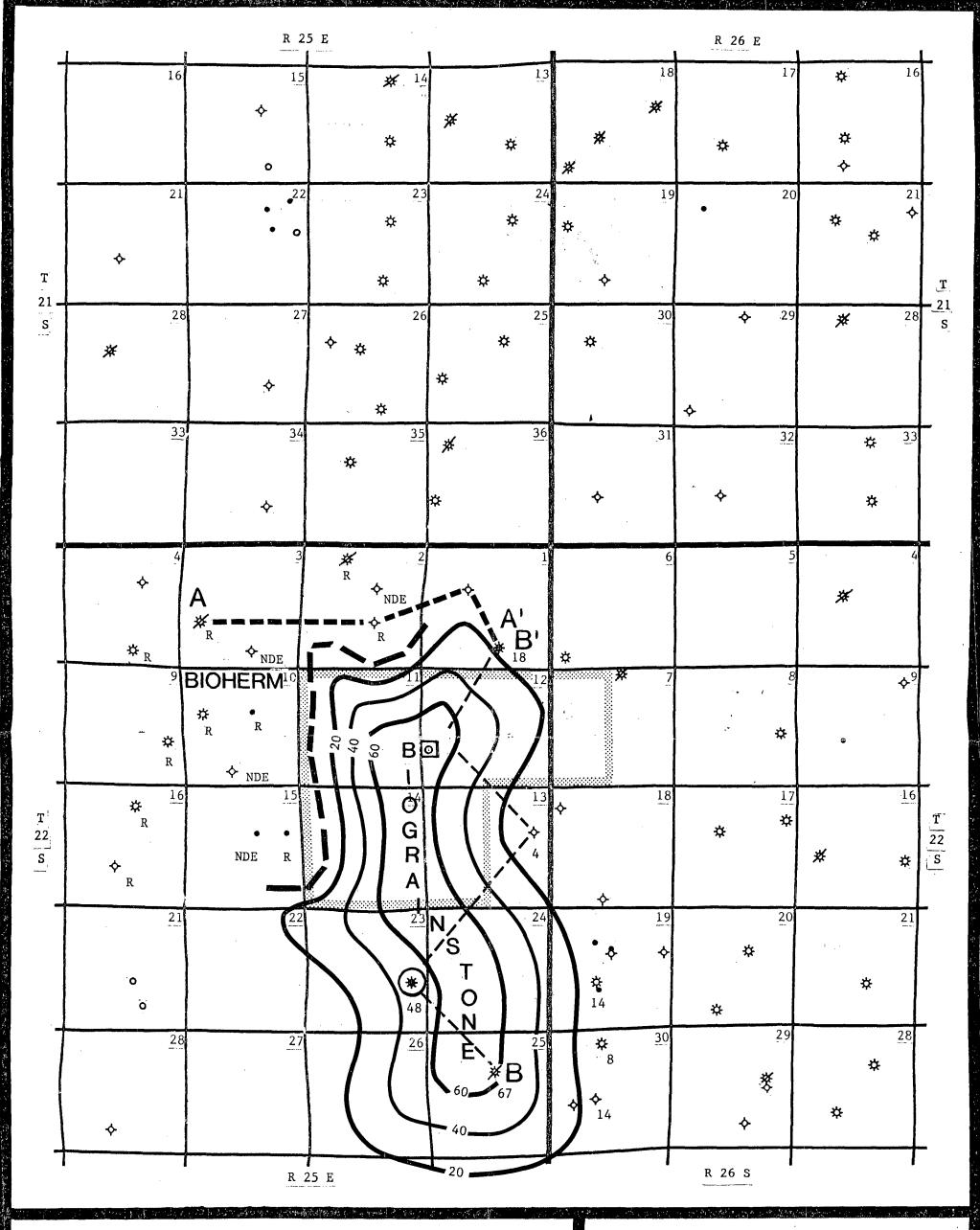
CMD : OG5SECT

ONGARD INQUIRE LAND BY SECTION

06/03/94 13:25:36 OGOMES -EMFP PAGE NO: 2

Sec : 12 Twp : 22S Rng : 25E Section Type : NORMAL

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\bigcirc	Upper Penn "C-2" Producer
R =	"Reef" or "Bioherm"

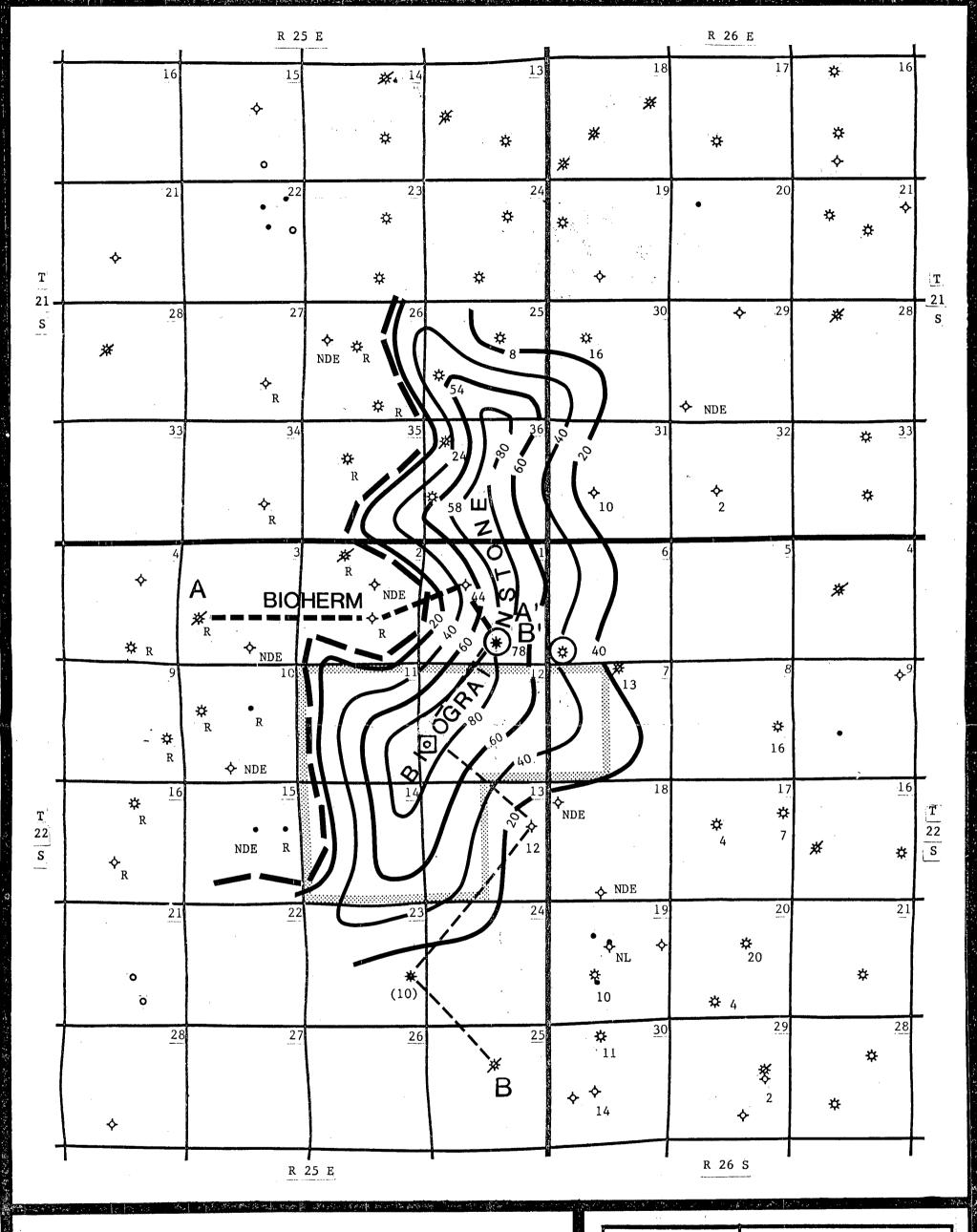


Scale: 1":4000'

PUSSYFOOT PROSPECT
EDDY COUNTY
NEW MEXICO

January, 1990

ISOPACH MAP
Upper Penn "C-2" Interval
Net Clean Carbonate
CI: 20'



PROPOSED LOCATION

YEC Acreage

Prospect Outline

Upper Penn C-3 Producer

R = "Reef" or "Bioherm"



PUSSYFOOT PROSPECT
EDDY COUNTY
NEW MEXICO

ISOPACH MAP
Upper Penn C-3 Interval
Net Clean Carbonate
CI: 20'

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January, 1990

