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*REGISTERED IN NEW MEXICO
AS HINKLE, COX, EATON,
COFFIELD & HENSLEY, P.L.L.C., LTD., CO.

*NOT LICENSED IN NEW MEXICO
*FORMERLY COMPRISING THE FIRM OF
CULTON, MORGAN, BRITAIN & WHITE, P.C.

March 8, 1995

VIA HAND DELIVERY

Michael E. Stogner
Oil Conservation Division
2040 So. Pacheco Street
Santa Fe, New Mexico 87501

Dear Mr. Stogner:

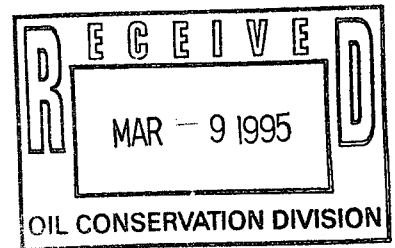
Pursuant to Division Rule 104(F)(1), Pogo Producing Company hereby applies for administrative approval of an unorthodox oil well location for the following well:

Red Tank Fed. 34 Well No. 15; 1700 feet FNL and 180 feet FWL (Unit E) of Section 34, Township 22 South, Range 32 East, N.M.P.M., Eddy County, New Mexico; West Red Tank-Delaware Pool.

The West Red Tank-Delaware Pool is subject to statewide spacing rules, with 40-acre spacing and wells to be located no closer than 330 feet to the boundary of the well unit.

All of Section 34 (except the SW $\frac{1}{4}$ SW $\frac{1}{4}$ and SE $\frac{1}{4}$ SE $\frac{1}{4}$), and all of offsetting Section 33 (except the NW $\frac{1}{4}$ NW $\frac{1}{4}$), is subject to Federal Lease NM 77060, which is owned by Pogo Producing Company. Therefore there are no offsetting operators or lessees to the proposed well unit. This information is from Bureau of Land Management lease files and OCD well files, and is current and correct.

Pogo has been verbally informed by the Bureau of Land Management that the proposed unorthodox location is the only permissible location in the SW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 34, due to both archeological and topographical reasons. In addition to archaeological sites (as determined by the BLM's preliminary archaeological examination), there are sand dunes on the well unit which the BLM does not want disturbed. The BLM has not set this forth in writing; should you have any questions, please contact Kathleen Borovac at the BLM's Carlsbad office. The APD and Form C-102 for the well is attached as Exhibit A.



POST OFFICE BOX 10
ROSWELL, NEW MEXICO 88202
(505) 622-6510
FAX (505) 623-9332

POST OFFICE BOX 3580
MIDLAND, TEXAS 79702
(915) 683-4691
FAX (915) 683-6518

POST OFFICE BOX 9238
AMARILLO, TEXAS 79105
(806) 372-5569
FAX (806) 372-9761

POST OFFICE BOX 2043
ALBUQUERQUE, NEW MEXICO 87103
(505) 768-1500
FAX (505) 768-1529

401 W. 15TH STREET, SUITE 800
AUSTIN, TEXAS 78701
(512) 476-7137
FAX (512) 476-5431

Michael E. Stogner
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Directional drilling to reach a standard bottom-hole location would increase the cost of the well by approximately \$50,000-\$100,000, and lead to substantially higher operating costs. Other operators who have drilled directional wells in the Delaware have experienced substantial cost overruns and operational difficulties. As a result, the applicant does not desire to directionally drill the well.

Based on these factors, Pogo Producing Company requests approval of the proposed location. Due to the absence of offsetting operators, applicant requests this application be processed as soon as possible.

This application is submitted in triplicate. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in black ink, appearing to read "James Bruce". The signature is fluid and cursive, with a large initial "J" and "B".

James Bruce
Attorneys for Pogo Producing Company

Enclosures
cc: Terry Gant

pogo2.1tr

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a. TYPE OF WORK

DRILL ☒

DEEPEN ☐

b. TYPE OF WELL

OIL
WELL ☒

GAS
WELL ☐

OTHER

SINGLE
ZONE ☒

MULTIPLE
ZONE ☐

2. NAME OF OPERATOR

POGO PRODUCING COMPANY

(915-682-6822)

3. ADDRESS AND TELEPHONE NO.

P. O. BOX 10340, MIDLAND, TEXAS 79702

4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.)*

At surface

1700' FNL AND 180' FWL OF SECTION 34

At proposed prod. zone

14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*

30 AIR MILES WEST OF EUNICE, NEW MEXICO

15. DISTANCE FROM PROPOSED*

LOCATION TO NEAREST
PROPERTY OR LEASE LINE, FT.
(Also to nearest drilg. unit line, if any)

1700'

16. NO. OF ACRES IN LEASE

1160

17. NO. OF ACRES ASSIGNED
TO THIS WELL

40

18. DISTANCE FROM PROPOSED LOCATION*
TO NEAREST WELL, DRILLING, COMPLETED,
OR APPLIED FOR, ON THIS LEASE, FT.

1290'

19. PROPOSED DEPTH

9000'

20. ROTARY OR CABLE TOOLS

ROTARY

21. ELEVATIONS (Show whether DF, RT, GR, etc.)

3626' GR

22. APPROX. DATE WORK WILL START*

UPON APPROVAL

23.

PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
17-1/2"	13-3/8"	54.5#	800'	SUFFICIENT TO CIRCULATE
11"	8-5/8"	32#	4500'	SUFFICIENT TO CIRCULATE
7-7/8"	5-1/2"	17#	9000'	TO TIE BACK 200' INTO 8-5/8"

AFTER SETTING PRODUCTION CASING, PAY ZONE WILL BE PERFORATED
AND STIMULATED AS NECESSARY.

SEE ATTACHED FOR: SUPPLEMENTAL DRILLING DATA
BOP SKETCH
SURFACE USE AND OPERATIONS PLAN
HYDROGEN SULFIDE DRILLING OPERATIONS PLAN

APPLICATION IS BEING MADE FOR APPROVAL OF THIS UNORTHODOX
WELL LOCATION.



IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

24.

SIGNED

Richard L. Wright
Richard L. Wright

TITLE

Division Operations Mgr.

DATE

February 27, 1995

(This space for Federal or State office use)

PERMIT NO.

APPROVAL DATE

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

CONDITIONS OF APPROVAL, IF ANY:

APPROVED BY

TITLE

DATE

*See Instructions On Reverse Side

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

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
Instruction on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

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

OIL CONSERVATION DIVISION

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

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name
		WEST RED TANK DELAWARE
Property Code	Property Name	Well Number
	RED TANK 34 FEDERAL	15
OGRID No.	Operator Name	Elevation
17891	POGO PRODUCING COMPANY	3626

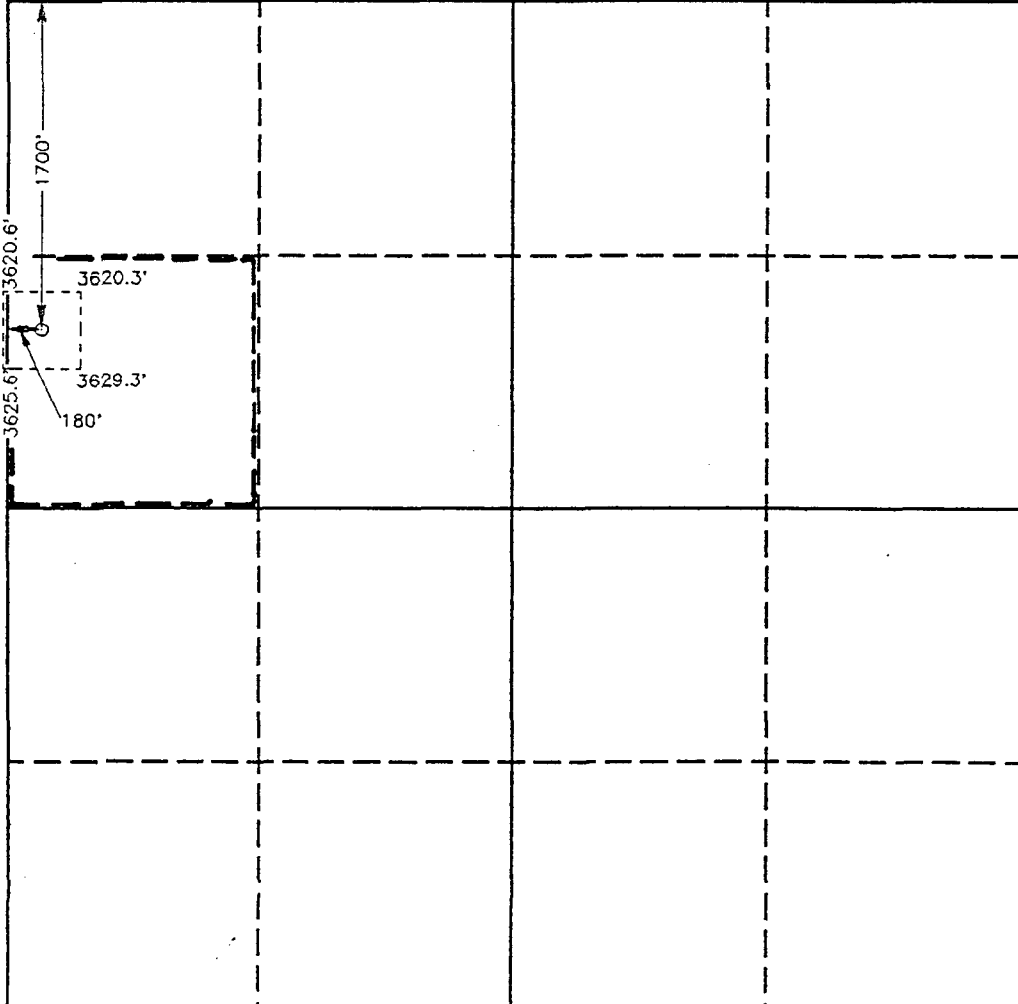
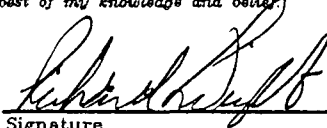
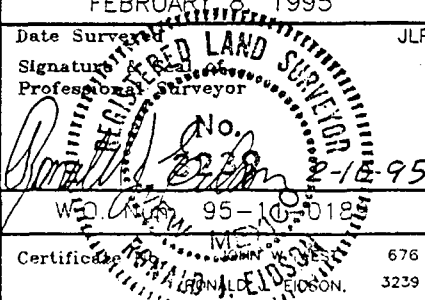
Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
E	34	22 S	32 E		1700	NORTH	180	WEST	LEA

Bottom Hole Location If Different From Surface

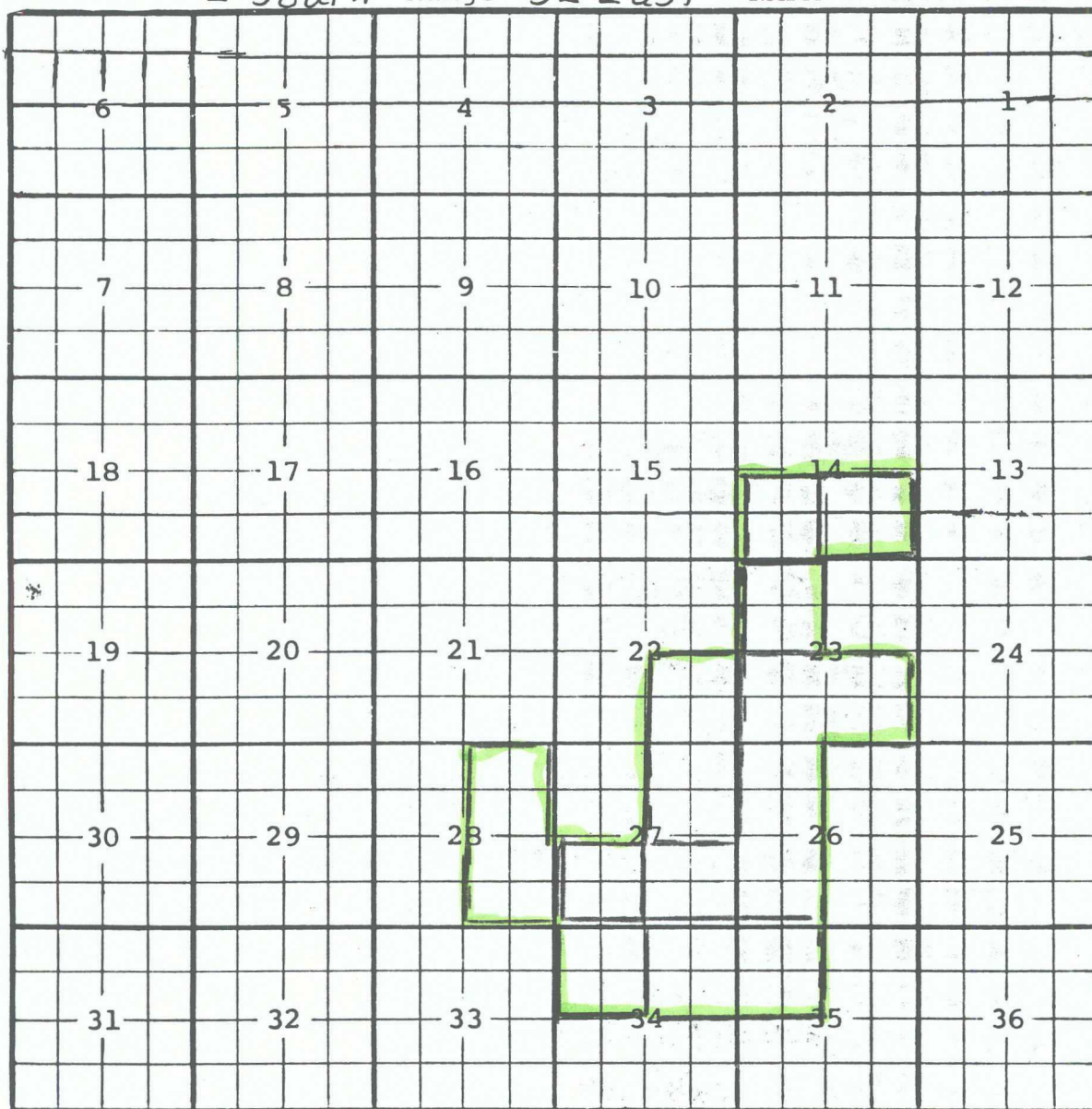
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint or Infill	Consolidation Code	Order No.	APPROVAL OF THIS UNORTHODOX WELL LOCATION IS BEING APPLIED FOR					
40	N								

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	OPERATOR CERTIFICATION <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</i>  Signature Richard L. Wright Printed Name Division Operations Mgr. Title February 24, 1995 Date	
	SURVEYOR CERTIFICATION <i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i> FEBRUARY 8, 1995 Date Surveyed Signature Professional Surveyor  Certificate No. 95-10018 JLP 676 3239	

County Lea Pool West Red Tank-Delaware

TOWNSHIP 22 South Range 32 East NMPM



Description: SW/4 Sec. 27 (R-9792, 12-3-92)

Ext: SE/4 Sec. 23, W/4 Sec. 26, SE/4 Sec. 27, E/2 Sec. 28 (R-9937, 8-17-93)

Ext: NW/4 Sec. 23 (R-10091, 3-28-94)

Ext: SW/4 Sec. 14, SE/4 Sec. 22, NE/4 Sec. 27, NE/4 Sec. 34, NW/4 Sec. 35 (R-10177, 8-30-94)

Ext: SE/4 Sec. 14, NW/4 Sec. 34 (R-10303, 1-23-95)

