

QUE CONSERVA ON DIVISION

Midland Division Exploration Production RECEIVED

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Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

June 14, 1995

Mr. Michael Stogner Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87504

Re: Administrative Application for an Unorthodox Gas Well Location for the Lockhart B-28 Well No. 1 and for Simultaneous Dedication of Well Nos. 1, 2, & 3 to NSP-127

Dear Mr. Stogner:

In response to the two questions in your letter of June 2, 1995 concerning the above application:

1. You are indeed correct that the Order NSP-127 which I sent with the application refers only to the dedication of Well No. 3. Since this 240-acre NSPU was established in 1955 and Wells No. 1 and 2 have been producing as classified oil wells until this year, I had assumed that these two wells had been "grandfathered" for dual dedication of oil and gas wells to the same acreage from an earlier era when this was allowed. I have dealt with several other such cases in the Eumont Pool.

But, since you brought this anomaly to my attention in your letter, I have more thoroughly researched our files and have visited with Jerry Sexton concerning this situation. Wells No. 1 and 2 were drilled and completed in 1936 in formations which later became part of the Eumont Gas Pool. Our files do not contain any records of acreage dedication for these two wells which is not uncommon for wells drilled in the 30's.

Jerry Sexton is of the opinion that since they were already producing as oil wells when the 240-acre NSPU was established for the No. 3 gas well in 1955 that the OCD in establishing this order considered Wells No. 1 and 2 as being "grandfathered" for dual dedication to the same acreage as the gas well.

However, this oddity is a moot issue now since both wells, Nos. 1 and 2, have been reclassified as gas wells and no longer need an exception to dual dedication. Well No. 2 was only reclassified to gas in May of this year so your records may not reflect this change as yet. Mr. Sexton has no problem with the past or the proposed dedication issues concerning this lease and welcomes your questions if he can be of further help.

The API Nos. for each of the wells, which you requested, are found on the C-102's filed with the application and are as follows:

> Well No. 1 --- 30-025-04809 Well No. 2 --- 30-025-04810 Well No. 3 --- 30-025-04811

Now that all three wells are classified as gas wells, and we have an established NSPU, it would appear that the only additional issue to be resolved beyond the scope of the initial application is the question of simultaneous dedication. Therefore, Conoco requests that Order NSP-127 be amended to include simultaneous dedication of the Lockhart B-28 Well Nos. 1, 2, and 3 to this 240-acre spacing unit.

I have also attached a copy of a "Waiver of Objection" that has been received from OXY, one of the offset operators. Thank you for your assistance in clarifying and resolving the issues of this application. If you have any further questions, please contact me at (915) 686-6548.

Very truly yours,

Jerry W. Hoover

Sr. Conservation Coordinator

WAIVER OF OBJECTION

We, the undersigned, have been given notice that OXY USA Inc. has applied or will apply to the New Mexico Oil Conservation Division for approval of an unorthodox gas well location and simultaneous dedication for the State E #6 well. The location is 2145' FSL & 495' FWL of Section 30, Township 19 South, Range 37 East, Eumont Yates 7 RVRS Qn (Pro Gas) Pool, Lea County, New Mexico. Well #6 would be simultaneously dedicated along with well #5 to a previously-approved non-standard gas proration unit (NSP-224) consisting of the southwest quarter of Section 30.

We, the undersigned, hereby waive any objection to the granting of this application.

Executed this 13th day	of June,	1995.

Company: Conoco Inc.

By: ____

Title: Sr. Conservation Coordinator

c:\wp\docs\waiver.kr 495/495 June 8, 1995

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

June 2, 1995

Conoco Inc.

10 Desta Drive - Suite 100W Midland, Texas 79705-4500

Attention: Jerry W. Hoover

RE:

Application for simultaneous dedication and an unorthodox gas well location on an existing 240-acre non-standard gas spacing and proration unit in the Eumont Gas Pool comprising the W/2 W/2 and E/2 SW/4 of Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico.

Lockhart "B-28" Well Nos. 1, 2, and 3.

Dear Mr. Hoover:

cc:

There appears to be some discrepancies between the information contained within the subject application and our records on file here in Santa Fe.

You stated that Division Administrative Order NSP-127 established the above-described 240-acre gas spacing and proration unit for production from the Lockhart "B-28" Well Nos. 2 and 3. The attached copy of said order refers to the No. 3 well only. All of my records indicate the No. 2 well to be a Eumont oil well, when did this well reclassify from an oil well to a gas well?

Could you also provide me with the correct API Nos. for each well so that I may reference this information in the order.

Thank you for your assistance and cooperation in this matter, also should you have any questions or comments concerning this matter, please contact me at (505) 827-8185.

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Michael E. Stogner

Chief Hearing Officer/Engineer

Oil Conservation Division - Hobbs William J. LeMay, Director - OCD, Santa Fe U. S. Bureau of Land Management - Carlsbad

OIL CONSERVATION COMMISSION P. O. BOX 871

SANTA FE, NEW MEXICO

April 16, 1955

Continental Oil Company Midland, Texas

Attention: Mr. R. L. Adams

Administrative Order NSP-127

Gentlemen:

Reference is made to your application for approval of a 240-acre nonstandard gas preration unit in the Eumoni Gas Pool consisting of the following acreage:

TOWNSHIP 21 SOUTH, RANGE 36 EAST, NMPM SW/4, and W/2 NW/4 of Section 28

Well No. 3, located 1980 feet from the South line and 660 feet from the West line of Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico.

By authority granted me under provisions of Rule 5, Section (b)-6 of the Special Rules and Regulations for the Eumont Gas Pool, as set forth in Order R-520, you are hereby authorized to operate the above described acreage as a non-standard gas proration unit, with allowable to be assigned thereto in accordance with pool rules, based upon the unit size of 240 acres.

Very truly yours,

W. B. MACEY, Secretary-Director





Midland Division **Exploration Production**

Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

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May 30, 1995

Mr. Michael Stogner Oil Conservation Division 2040 S. Pacheco Santa Fe. New Mexico 87504

Administrative Application for an Unorthodox Gas Well

Location for the Lockhart B-28 Well No. 1 located at 660' FNL and 660' FWL, Sec. 28, T-21S, R-36E, Lea County, New Mexico and for Simultaneous Dedication with Well

Nos. 2 and 3 to an existing 240-Acre Non-Standard

Proration Unit established by Order NSP-127

Dear Mr. Stogner:

The Lockhart B-28 No. 1, indicated by the arrow in EXHIBIT A, has historically been classified and produced as a Eumont oil well at a standard oil well location. Declining oil production and an increasing GOR has caused this well to be reclassified as a gas well, which results in the necessity for approval of its location as unorthodox according to the Eumont Gas Pool rules.

EXHIBIT A shows the 240-acre boundary of the Lockhart B-28 Lease that is identical to the approved 240acre NSP-127 which was established for production from Well Nos. 2 and 3. Therefore, it is requested that production from Well No. 1 also be simultaneously dedicated to this same 240-acres by NSP-127. New C-102 acreage dedication plats for all three wels are attached as EXHIBIT NOS. B, C, and D.

For this 240-acre spacing unit the location for Well No. 1 would be required to be 660 feet from the side boundary and 990 feet from the end boundary. Therefore, approval is also requested for the resulting unorthodox location for this well which was unfortunately created by the unforeseen decline in oil production.

Well Nos. 2 and 3, are not capable of producing the allowable for the spacing unit. Therefore, the additional production from Well No. 1 is required for Conoco to produce the approved allowable for this lease and to protect its correlative rights from drainage by surrounding units.

A copy of this application was sent by certified mail to all offset operators to this proration unit. Copies of the certified mail receipts are attached as EXHIBIT E. If there are any further questions concerning this application, please contact me at (915) 686-6548.

Very truly yours,

Jerry W. Hoover

Sr. Conservation Coordinator

cc: Hobbs District NMOCD Office

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240-Acre NSP-127

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State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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PO Box 2088, Santa Fc, NM 87504-2088

12 Dedicated Acres

240

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-102 Revised February 21, 1994 Instructions on back

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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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

15 Order No.

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° 3				Date 18 SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plut 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. Date of Survey Signature and Scal of Professional Surveyer:
240-Acre				Certificate Number

District I PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410

PO Box 2088, Santa Fc, NM 87504-2088

1980'

District IV

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-102 Revised February 21, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

■ AMENDED REPORT

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or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey

Certificate Number

Date

Signature and Seal of Professional Surveyer:

EXHIBIT

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Midland, TX 79702

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Citation Oil & Gas Corp. P.O. Box 4357 Odessa, TX 79760

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Receipt for Certified Mail

No Insurance Coverage Provided Do not use for International Mail

John Hendrix Corp. 223 W. Wall, Ste. 525 Midland, Texas 79701

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GAS PRORATION SCHEDULE - SOUTHEAST FOR OCT94 THRU MAR95

DATE: 12-28-94

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× .	(3) 2 ! 15-22-37 H		15 G 11-22-37 #HGH
L 28-21-37 H) 2 A 17-22-37 H	**************************************	K OWEN 2 M 35-21-37
J 29-21-37 W	3 E 9-21-37 #M24	\siAiE 30 (3) 1 30-21-30 \ " (4) 2 P 36-21-36	" 4 K 35-21-37 MGW
P 30-21-37 W	2 2	BRUNSON C 4 J 3-22-37 MGH	2 G 13-22-36 M
P 29-21-37 W	7 C 8-21-37 #H18		=
H 28-21-37 I	9 8 8-21-37 #412	7 P 3-22-37	
. 0	2 J 9-21-37 #111	COSSAIDI F 1 C 23-22-37 #M16	MAYNE & MERIZ INC HHWHHHH
0 33-21-37 1	6 L 9-21-37 #44	500 \ " (1) 3 D 23-22-37 #W25 80000	" (2) 1 U 6-21-38 #M7 2222
A 52-21-37 b		" (1) 5 E 23-22-37 #116	(1) 2
,	9 H 9-21-37 #H26	* (1) 7 D 15-22-37 M	5
: > (10 P 8-21-37 M	- >	(3) 1 B 18-22-37 #H29 (3) 2 C 18-22-37 M
· m =			LITTLE V (2) 1 N 7-22-37 N 13000
139 G 32-21-37 INPUT	3 N 17-21-37 MV20). 925 Limits
m =		EVA OWENS A	(3) 3 0 7-22-37 H
F 33-21-37 W	5 A 27-21-37 MGW	47000 " (2) 2 [25-21-37 # 6500	MATTERN (2) 1 K 7-22-37 M 4000
2	KHART A 35	GRIZZELL 2 P 5-22-37 MGW	(2) 2 J 7-22-37 M
~ -			CANA FEDERAL
1 32-21-37	3 3	333 " (1) 1 E 20-21-37 #M16 27500	Acreage Factor 0.925
	5 B 11-21-37 H	17 0 0-22-37 M	ts 4-22-37 +132
# 152 0 32-21-37 WF	8 0 11-21-37 #422	LR COME A	92.27
156 M 33-21-37 UF	10 H 11-21-37 #H12	T .	ts ts
# 156 0 33-21-37 WF	15 J 11-21-37 数27	LOCKHART B 11	(A) & RC
D 29-21-37	35		6 E 10-22-37
F 29-21-37 L		H (2) 12 M 21-21-37 M	13 A 9-22-37
# 162 K 29-21-37 NPUT	(2) 3 C 12-21-37 ##15 10 LOCKHART 8 13 A	10000 PART E WANTZ 1000 10 (2) 3 P 21-21-37 M 11000	17
	(2) 9 H 13-21-37 #H13	4571	

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t annual femine

CMD : OG6IWCM

ONGARD INQUIRE WELL COMPLETIONS 06/02/95 12:45:30 OGOMES -EMD0

API Well No : 30 25 4811 Eff Date : 01-01-1900 WC Status : A

Pool Idn : 76480 EUMONT; YATES-7 RVRS-QUEEN (PRO GAS)

OGRID Idn : 5073 CONOCO INC Prop Idn : 3048 LOCKHART B 28

Well No : 003 GL Elevation: 99999

U/L Sec Township Range North/South East/West Prop/Act(P/A)

: L 28 21S 36E FTG 999 F S FTG 999 F E P B.H. Locn

Lot Identifier:

Dedicated Acre: 240.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

 PF01 HELP
 PF02
 PF03 EXIT
 PF04 GoTo
 PF05
 PF06

 PF07
 PF08
 PF09
 PF10 NEXT-WC
 PF11 HISTORY
 PF12 NXTREC

CMD : OG6 IWCM

ONGARD INQUIRE WELL COMPLETIONS 06/02/95 12:45:50 OGOMES -EMDO

API Well No : 30 25 4812 Eff Date : 05-02-1994 WC Status : A

Pool Idn : 22800 EUMONT; YATES-7 RVRS-QUEEN (OIL)

OGRID Idn : 5073 CONOCO INC Prop Idn : 3048 LOCKHART B 28

Well No : 004 GL Elevation: 99999

U/L Sec Township Range North/South East/West Prop/Act(P/A)

: M 28 21S 36E FTG 999 F S FTG 999 F E P B.H. Locn

Lot Identifier:

Dedicated Acre: 40.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06
PF07 PF08 PF09 PF10 NEXT-WC PF11 HISTORY PF12 NXTREC

CMD : OG6IWCM

ONGARD INQUIRE WELL COMPLETIONS

06/02/95 12:41:47 OGOMES -EMDO

API Well No : 30 25 4809 Eff Date : 01-01-1900 WC Status : A

Pool Idn : 22800 EUMONT; YATES-7 RVRS-QUEEN (OIL)

OGRID Idn : 5073 CONOCO INC Prop Idn : 3048 LOCKHART B 28

Well No : 001 GL Elevation: 99999

U/L Sec Township Range North/South East/West Prop/Act(P/A)

: D 28 21S 36E FTG 660 F N FTG 660 F W

B.H. Locn Lot Identifier:

Dedicated Acre: 40.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

 PF01
 HELP
 PF02
 PF03
 EXIT
 PF04
 GoTo
 PF05
 PF06

 PF07
 PF08
 PF09
 PF10
 NEXT-WC
 PF11
 HISTORY
 PF12
 PF10 NEXT-WC PF11 HISTORY PF12 NXTREC CMD: ONGARD
OG6IWCM INQUIRE WELL COMPLETIONS

API Well No : 30 25 4810 Eff Date : 01-01-1900 WC Status : A

Pool Idn : 22800 EUMONT; YATES-7 RVRS-QUEEN (OIL)

OGRID Idn : 5073 CONOCO INC Prop Idn : 3048 LOCKHART B 28

Well No : 002 GL Elevation: 99999

U/L Sec Township Range North/South East/West Prop/Act(P/A)

06/02/95 12:45:02

OGOMES -EMD0

B.H. Locn : E 28 21S 36E FTG 999 F S FTG 999 F E P

Lot Identifier:

Dedicated Acre: 40.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06

PF07 PF08 PF09 PF10 NEXT-WC PF11 HISTORY PF12 NXTREC