

Shell Western E&P Inc.

An affiliate of Shell Oil Company



(11-27)

P. O. Box 576 Houston, TX 77001

November 26, 1996

Mr. Michael E. Stogner
State of New Mexico
Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
2040 South Pacheco
Santa Fe NM 87505

RE: Application for Administrative Approval of an

Unorthodox well location

Silurian - Wildcat, Strawn - Wildcat,

Oil Center - Blinebry Pool,

Tubb Drinkard - Wildcat, Abo - Wildcat, Wolfcamp - Wildcat & Glorietta - Wildcat

State P.C. Com well #1 Section 32, T20S, R37E Lea County, New Mexico

Dear Mr. Stogner:

30-025-33672

Your office has previously approved an unorthodox location (NSL-3733) 1000' FSL and 2370' FEL of Section 32 as to the Ellenburger and McKee (Simpson) zones for possible gas production. We come to you now regarding the Silurian, Strawn, Blinebry, Tubb Drinkard, Abo, Wolfcamp and Glorietta zones and likewise request your approval of the aforementioned location so that, if necessary, we might produce from any of these zones from the State P.C. Com well #1, if necessary.

From our research, it appears that all of the captioned zones are classified Wildcat in this location, save and except the Blinebry, for which we find the Oil Center - Blinebry Pool rules apply i.e., 80-acres, 330' from boundaries, wells in NW and/or SE of each quarter section. We are unable to comply with the NW/SE of each quarter section as the Blinebry is certainly not a primary objective in this wellbore however, as stated below, we believe we can substantiate our reasoning as to the 330' from boundaries problem in the Blinebry Pool and the other Wildcat zones.

Enclosed please find Forms C-101 and C-102, a topographic survey from John W. West Engineering Company, together with vicinity, location and drill pad plats. As outlined in our request for permit dated October 29, 1996 for the Ellenburger and McKee/Simpson gas zones, we have selected the location shown above due to the fact

Page 2 Mr. Michael E. Stogner November 26, 1996

that there are five buried pipelines located where the captioned zones would have been orthodox together with geological considerations for remaining structurally updip on the west side of the SW/4 SE/4 of Section 32.

As you have previously approved this well's unorthodox location as to its primary objectives by NSL-3733, we hereby request administrative approval of the unorthodox location for the oil zones. Due to the above, we request that you waive the notification and 20-day waiting period for this administrative approval.

If you have any questions or need additional information, do not hesitate to contact the undersigned at 281-544-3226. In fact, if you wouldn't mind, I would appreciate an opportunity to chat with you concerning this application. It is one of the more complicated I've faced in my short tenure here at Shell.

You**gg** very truly,

Jeff A. Dethrow CPL Contract Landman Western Asset Administration Continental Division

attach

xc w/ attach:

Mr. Jerry Sexton State of New Mexico Oil Conservation District P.O. Box 1980

Hobbs NM 88241-1980

State of New Mexico Energy, Minerals & Natural Resources Department

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
District IV
PO Box 2088, Santa Fe, NM 87504-2088

OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, NM 87504-2088

Form C-101 Revised February 10, 1994 Instructions on back Submit to Appropriate District Office State Lease - 6 Copies Fee Lease - 5 Copies

X AMENDED REPORT

APPLIC	AHON		erator name and		LL, KE-EN	iek, de	EPEN,	PLUGBAC	?		A ZUNE RID Number
Shell West	ern E&P I	_	crator name and	Addiess						C	20676
P.O. Box 5	76										PI Number
Houston, T	X 77001								30-0	30	-025-33672
4 Pro	perty Code				5	Property Name				6	Well Number
	19945		_		ST	ATE P.C. CO	M			L	1
					⁷ Surface I	Location					
UL or lot no.	Section	Township	Range	Lot. Idn	Feet from	the North/S	South Line	Feet from the	East/West	line	County
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		8	Proposed	Bottom	Hole Locati	on If Differe	ent Fron	n Surface			
UL or lot no.	Section	Township	Range	Lot. Idn	Feet from	the North/S	South Line	Feet from the	East/Wes	t line	County
		9 Proposed	Pool 1	_				10 Proposed Po	2012		
		_						_			
	SI	LURIAN -	WILDCAT					STRAWN - V	VILDCAT		
11 Work T	ype Code	12	Well Type C	ode	13 Cable	'Rotary	14 Lea	ise Type Code	15 Gro	ound I	evel Elevation
						•		6		25	007 01
N G 16 Multiple 17 Proposed Depth					18 Form	ations	19	S Contractor	-	3529' GL 20 Spud Date	
					1	*					
N 12,300'								NORTON		12/	/21/96
					osed Casing						
Hole S		Ca	sing Size	Casing weight/foot		Setting D	<u> </u>	Sacks of Ceme	nt	Est	imated TOC
24			20"		CONDR	40		60		SURF	
17-1			5/8"		48# 36"	123		900			SURF
12-1 8-3			-5/8" 7"	2	 6#&29#	530 1100		1000 1300		SURF 4300'f/SFC	
6-1					18#	1230		75		11000	
BOP Progra Expected s Previously and McKee the Ellenbu	m 2000# spud 12/s received - Wildca rger/Mck	Ram Pre 21/96 approva it gas zo kee zone trawn –	if any. Use acventer. I for this unes (NSL-s do not power wildcat; Oil	northod 3733). an out a Center	ox location The followin as anticipate - Blinebry;	as to the E g zones ar ed:	llenburg e being	ent productive zone er – Wildcat permitted in t			v productive zone.
Abo - Wildcat; Wolfcamp - Wildcat & Glorietta - Wildcat. 23 I hereby certify that the information given above is true and complete to the best of my knowledge and brief. Signature:						OIL CONSERVATION DIVISION Approved by:				N	
Printed name: J	eff A. De	throw C	PL	,		Title:					
Title: Contra	ct Landm	nan				Approval Date: Expiration Date:					
Date:			Phone:	4 4500		Conditions of	Approval:				
11/26/9	11/26/96 (713) 544-4589				Attached						

DISTRICT I P.O. Box 1980, Hobbs, NM 88841-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

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

DISTRICT II P.O. Drawer DD, Artesia, NM 88211-0719

P.O. BOX 2055, SANTA PK, N.M. 67504-2058

DISTRICT III

DISTRICT IV

1000 Rio Braxos Rd., Axtec, NM 87410

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name
30-025-33672	SILURIAN - WILD	CAT
Property Code	Property Name	Well Number
19945	STATE P.C. COM	1
OGRID No.	Operator Name	Elevation
020676	SHELL WESTERN E. & P. INC.	3529'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	32	² 20 S	37 E		1000	SOUTH	2370	EAST	LEA

Bottom Hole Location If Different From Surface

DOWN IN DURING THE DESIGNATION OF THE DESIGNATION O											
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
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Dedicated Acres	Joint a	r Infill Co	nsolidation (Code Or	der No.						
1											
	1	1	•	1							
1		i									

				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96 Date SURVEYOR CERTIFICATION
SHELL	SHELL	SHELL	SHELL	I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me er under my supervison, and that the same is true and correct to the best of my belief. OCTOBER 3, 1996 Date Surveyed RES Signature & Scales RES
SHELL	SHELL	L SHETT	SHELL	Corcinca No. JOHN WO WEST 676 ROWNED J. EIDSON 3239 12641

DISTRICT I P.O. Box 1980, Hobbs, NK 86841-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

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DISTRICT II P.O. Drawer DD, Artonia, NM 88211-0719

DISTRICT IV

DISTRICT III 1000 Rio Brazos Rd., Artec, NM 67410

P.O. BOX 2068, SANTA PK, N.M. 87604-2066

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name			
30-025-33672		STRAWN - WILDCAT			
Property Code	Propert	Property Name			
19945	STATE P.C. COM		1		
OGRID No.	Operato	r Name	Elevation		
020676	SHELL WESTERN	E. & P. INC.	3529'		

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	32	20 S	37 E		1000	SOUTH	2370	EAST	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	r Infili Co	nsolidation (Code Or	der No.	1		L	

				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96 Date SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was platted from field notes of actual surveys made by me or under my supervison, and that the same is true and
SHELL -	SHELL	SHELL	SHELL	OCTOBER 3, 1996 Date Survived RES Signature & Seal of RES Processional Surveyor
SHELL	SHELL	1- SHELL	SHELL	Common No. 101 NO 1221 Common No. 101 NO 1EST 678 RONADO J. EIDSON 3239 PROFES START CIDSON 12641

DISTRICT I P.O. Box 1980, Hobbs, NM 86841-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

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DISTRICT II P.O. Drawer DD, Artonia, NM 58211-0719

DISTRICT III

1000 Rio Brazos Rd., Astec, NM 87410

OIL CONSERVATION DIVISION

P.O. Box 2088

DISTRICT IV P.O. BOX 2088, SANTA FK, N.M. 87504-2068 Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name
30-025-33672	OIL CENTER - B	LINEBRY
Property Code	Property Name	Well Number
19945	STATE P.C. COM	1
OGRID No.	Operator Name	Elevation
020676	SHELL WESTERN E. & P. INC.	3529'

Surface Location

1	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
	0	32	20 S	37 E		1000	SOUTH	2370	EAST	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
1							•		
Dedicated Acres Joint		Infill Co	nsolidation (Code Or	ier No.	 		·	·
	}			-					

				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the
				Signature
			1	JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96
		1	-	SURVEYOR CERTIFICATION
				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 supervison, and that the same is true and correct to the best of my belief.
SHELL	SHELL	SHELL	SHELL	OCTOBER 3, 1996 Date Survived RES Signature & Soal of Processional Survivor
		1000'	2370'	10004-96
SHELL	SHELL	SHELL	SHELL	CONTROL NO. 101N W VEST 676 ROMAD . EIDSON 3239 POFES STAN EIDSON 12641

DISTRICT I P.O. Box 1980, Hobbs, NM 86241-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

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DISTRICT III

OIL CONSERVATION DIVISION

P.O. Box 2088

DISTRICT IV P.O. BOX 2008, SANTA FK, N.M. 67604-2068

1000 Rio Brazos Rd., Axtec, NM 87410

Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code TUBB DRINKARD - V	Pool Name
30-025-33672	TODE DETINARD - I	NILUGAI
Property Code	Property Name	Well Number
19945	STATE P.C. COM	1
OGRID No.	Operator Name	Elevation
020676	SHELL WESTERN E. & P. INC.	3529'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	32	20 S	37 E		1000	SOUTH	2370	EAST	LEA

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Fest from the	North/South line	Feet from the	East/West line	County
					•		•		
Dedicated Acres Joint or Infill Consolidation Code					ler No.				L
		İ		}				•	
				1					

				
			,	OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.
				Signifure
			· ·	JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN
				11/26/96 Date SURVEYOR CERTIFICATION
				I hereby certify that the well location shown on this plat was plotted from field nates of actual surveys made by me or under my supervison, and that the same is true and correct to the best of my belief.
SHELL	SHELL	SHELL	SHELL	OCTOBER 3, 1996 Date Survived RES Signature & Seal of Proceedings Survived RES
		.00	2370' —————	10-04-96
SHELL	SHELL	SHETT	SHELL	CONTROL NO. JOHN WO JEST 676 RONADO J. EIDSON 3239 12641

DISTRICT I P.O. Box 1980, Hobbs, NM 86241~1980 State of New Mexico

Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
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DISTRICT II P.O. Drawer DD, Artesia, NM 58211-0719 Energy, Minerals and Natural Resources Department

DISTRICT III 1000 Rio Brazos Rd., Artec, NM 67410

P.O. BOX 2068, SANTA FE, N.M. 67604-2068

DISTRICT IV

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

[] AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Na	me
30-025-33672		ABO - WILDCAT	
Property Code	Property	Name	Well Number
19945	STATE P.C. COM		1
OGRID No.	Operator	Name	Elevation
020676	SHELL WESTERN	E. & P. INC.	3529'

Surface Location

Γ	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
	0	32	20 S	37 E		1000	SOUTH	2370	EAST	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		Code Or	der No.	·			·		
		ľ							

				
				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96 Date
				SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was platted from field notes of actual surveys made by me or under my supervisors and that the same is true and correct to the best of my belief.
SHELL	SHELL	SHELL	SHELL	OCTOBER 3, 1996 Date Survived RES Signature & Seal of Programment Survived RES
SHELL	SHELL	SHELL SHELL	2370'	# 10-04-96 W.O. Supply 96-15-1221 Control No. John W. Jest 676 ROMAD L. EDSON 3239 POFESSAN EDSON 12641

DISTRICT I P.O. Box 1980, Hobbs, NM 86841-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

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DISTRICT II P.O. Drawer DD, Artonia, NM 868211-0719

DISTRICT IV

DISTRICT III 1000 Rio Brasos Rd., Astec, NM 87410

P.O. BOX 2066, SANTA FK, N.M. 87504-2068

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name	
30-025-33672		WOLFCAMP - WILDCAT	
Property Code	Property	Name	Well Number
19945	STATE P.C. COM		1
OGRID No.	Operator	Name	Elevation
020676	SHELL WESTERN	E. & P. INC.	3529'

Surface Location

[UL or lot No.	Section	Township	Range	Lot Idn	Foot from the	North/South line	Foot from the	East/West line	County
1	0	32	20 S	37 E	·	1000	SOUTH	2370	EAST	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
		<u> </u>	<u> </u>						
Dedicated Acre	Joint o	- Pull C	onsolidation C	ode Or	der No.				
			•						

		DARD UNII HAS DEI		
				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Significant Significant Significant Significant Significant JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96 Date SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was platted from field nates of
SHELL	SHELL	SHELL SHELL	SHELL 2370'	octual surveys made by me er under my supervison and that the same is true and correct to the best of my belief. OCTOBER 3, 1996 Date Surveyod RES Significant & Seal of RES Professional Murrory W.O. Willow 96-15-1221 Continuate No. John W. JEST 676 ROMAD O. EDSON 3239 POFESSIAN JOSON 12641

DISTRICT I P.O. Box 1980, Hobbs, RM 88241-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

Form C-102 Revised February 10, 1994 Submit to Appropriate District Office

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DISTRICT II P.O. Drawer DU, Artesia, KM 80211-0719

DISTRICT IV

DISTRICT III 1000 Rio Brance Rd., Astec, NM 87410

P.O. BOX 2005, SANTA FK, N.M. 87604-2005

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

CI AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Cods	Pool Name
30-025-33672	GLORIETTA -	WILDCAT
Property Code	Property Name	Well Number
19945	STATE P.C. COM	1
OGRID No.	Operator Name	Klevation
020676	SHELL WESTERN E. & P. INC.	3529'

Surface Location

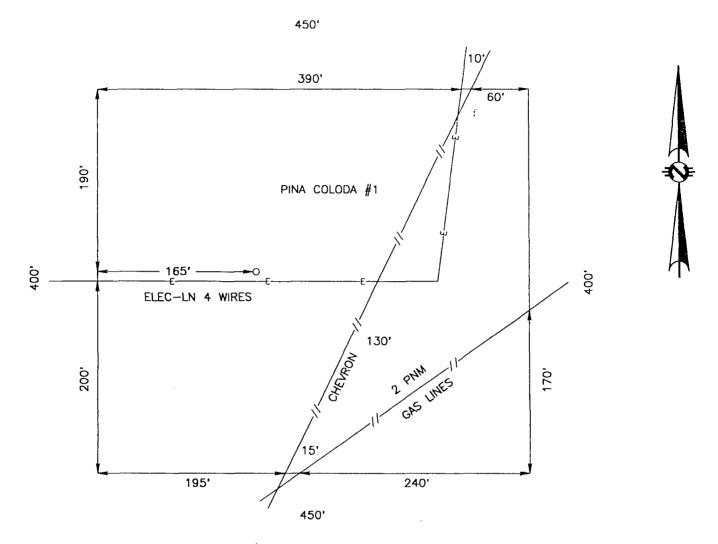
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/Wost line	County
0	32	20 S	37 E		1000	SOUTH	2370	EAST	LEA

Bottom Hole Location If Different From Surface

UL or lot No.	Bection	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint o	r Infili Con	nsolidation (Code Or	der No.	<u> </u>	1	I	l

				OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature JEFF A DETHROW CPL Printed Name CONTRACT LANDMAN Title 11/26/96 Date SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of section surveys made by me or under my supervisors and that the same is true and correct to the best of my belief.
SHELL	SHELL	SHELL	SHELL	OCTOBER 3, 1996 Date Surficed RES Signature & Seal of Processional Surveyor
SHELL	SHELL	SHELL	2370'	MAN 2897 / 20 10-04-96 W.O. Supply 96-13-1221 Control No. John Wolfest 676 ROMAD J. EIDSON 3239 PROFESSIAN EIDSON 12641

SECTION 32, TOWNSHIP 20 SOUTH, RANGE 37 EAST, N.M.P.M. LEA COUNTY, NEW MEXICO





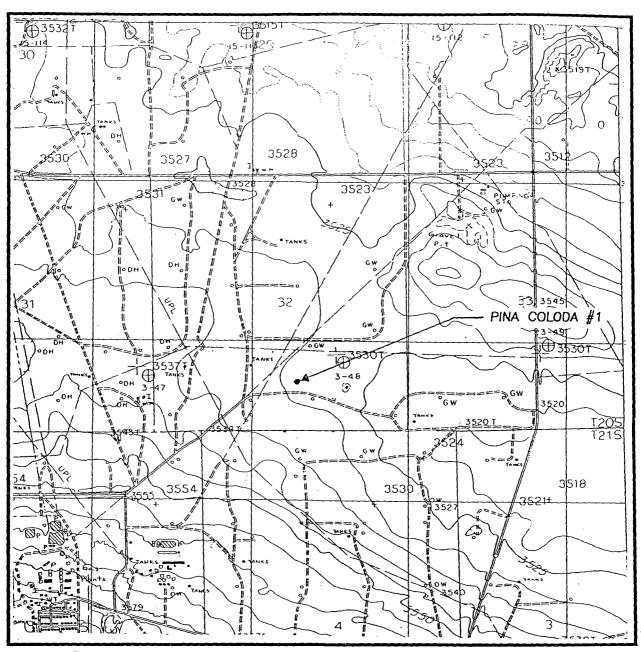
SHELL WESTERN E & P, INC.

THE PINA COLODA NO. 1 IS LOCATED 1000 FEET FROM THE SOUTH LINE AND 2370 FEET FROM THE EAST LINE OF SECTION 32, TOWNSHIP 20 SOUTH, RANGE 37 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.

Survey Date: 10	-03-1996	Sheet	1	of	1	Shee	ets
W.O. Number: 96	-11- <u>1</u> 221	Drawn	Ву:	RES			
Data: 10 04 06	06111221	BS_1	1		Scale	a·1" = 10	<u>α.</u>

JOHN W. WEST ENGINEERING COMPANY
CONSULTING ENGINEERS & SURVEYORS — HOBBS, NEW MEXICO

LOCATION VERIFICATION MAP



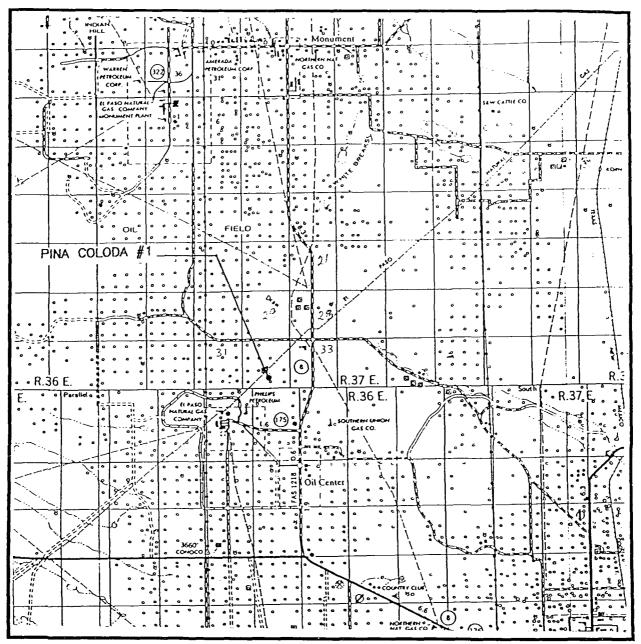
SCALE: 1'' = 2000'

CONTOUR INTERVAL: MONUMENT SOUTH - 5'

SEC. 32 TWP. 20-S RGE. 37-E	
SURVEY N.M.P.M.	
COUNTYLEA	
DESCRIPTION 1000' FSL & 2370' FEL	
ELEVATION 3529'	
OPERATOR SHELL WESTERN E. & P. IN LEASE PINA COLODA	C.
U.S.G.S. TOPOGRAPHIC MAP	
MONUMENT SOUTH, N. MEX.	

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117

VICINITY MAP

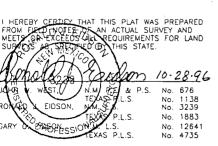


SCALE: 1" = 2 MILES

SEC. 32 IWP.	20-5 RGE. 37-E	
SURVEY	N.M.P.M.	
COUNTY	LEA	
DESCRIPTION 100	00' FSL & 2370' FEL	
ELEVATION	3529'	
OPERATOR_SHELL	L WESTERN E. & P. IN	١C
LEASE	PINA COLODA	

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117

32, 20 SOUTH, RANGE 37 EAST, N.M.P.M. TOWNSHIP SECTION NEW MEXICO LEA COUNTY, (2) EL PASO 22 PAW BP BP PIÑA COLADA #1 4-WIRE ELEC. LN. RICE CALICHE = LICHE ROAD TANK BATTER MÈRIDIAN SHEL #8 ¥ CHEVRON #176 BPL (B) ELEC. SW/4 SE/4 32, T-20-S, R-37-E USGLO B.C. 1/4 COR. SEC. 4, T-21-S, R-37-E



٠ [

JOHN W. WEST ENGINEERING COMPANY CONSULTING ENGINEERS & SURVEYORS - HOBBS, NEW MEXICO



SHELL WESTERN E & P INC.

TOPOGRAPHIC SURVEY FOR THE PINA COLADA #1 1000 FSL, 2370 FEL, SECTION 32, TOWNSHIP 20 SOUTH RANGE 37 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.

Survey Date: 10-22-96	Sheet 1 of 1 Sheets
W.O. Number: 96-11-1355	Drawn By: CDG
Date:10-24-96 Disk: SHELL2	SWEP1355 Scale:1"=200'

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

November 4, 1996

Shell Western E & P, Inc. P. O. Box 576 Houston, Texas 77001 Attention: Jeff A. Dethrow

Administrative Order NSL-3733

Dear Mr. Dethrow:

Reference is made to your application dated October 29, 1996 for approval to drill the State P. C. Com Well No. 1 at an unorthodox gas well location to test both the McKee (Simpson) and Ellenburger formations 1000 feet from the South line and 2370 feet from the East line (Unit O) of Section 32, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The S/2 of said Section 32 to be dedicated to said well to form a standard 320-acre gas spacing and proration unit for both intervals.

The application has been duly filed under the provisions of Rule 104.F of the General Rules and Regulations of the New Mexico Oil Conservation Division ("Division"), revised by Division Order No. R-10533, issued by the Oil Conservation Commission in Case 11,351 on January 18, 1996.

By the authority granted me under the provisions of Division General Rule 104.F(2), the above-described unorthodox gas well location is hereby approved.

Sincerely,

William J. LeM

Director

WJL/MES/kv

cc: Oil Conservation Division - Hobbs

New Mexico State Land Office - Santa Fe

COUNTY LEA POOL HARDY TUBR-DRINKARD

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