OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

December 23, 1999

Texaco Exploration & Production, Inc. P. O. Box 3109
Midland, Texas 79702
Attention: A. Phil Ryan

Administrative Order NSL-3760-A (SD)

(Non-Standard Subsurface Location/Producing Area)

Dear Mr. Ryan:

Reference is made to the following: (i) your initial application dated November 30, 1999; (ii) the New Mexico Oil Conservation Division's ("Division") initial response by letter dated December 6, 1999 from Mr. Michael E. Stogner, Chief Hearing Officer/Engineer in Santa Fe withdrawing this application; (iii) your telephone conversation with Mr. Stogner on Monday, December 20, 1999; (iv) your re-submittal of this application to the Division on December 21, 1999; and (v) the Division's records in Santa Fe: all concerning Texaco Exploration and Production, Inc.'s ("Texaco") requests to drill the C. C. Fristoe "B" Federal NCT-2 Well No. 25 as an infill well for both the Justis-Blinebry and Justis-Tubb-Drinkard Pools at an unorthodox bottomhole oil well location/non-standard subsurface oil producing area, pursuant to Division Rules 104.F, 111.C(2), and 111.A(7), within existing standard 40-acre oil spacing and proration units for both pools comprising the SW/4 NE/4 (Unit G) of Section 35, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico.

Justis-Blinebry Pool production within this unit is currently dedicated to Texaco's: (i) C. C. Fristoe "B" Federal NCT-2 Well No. 8 (API No. 30-025-20928), located at a standard oil well location 1980 feet from the North line and 1979 feet from the East line of Section 35; and (ii) C. C. Fristoe "B" Federal NCT-2 Well No. 20 (API No. 30-025-33804), located at an unorthodox infill oil well location (approved by Division Administrative Order NSL-3760, dated January 22, 1997) 1450 feet from the North line and 2575 feet from the East line of Section 35.

Justis-Tubb-Drinkard Pool production within this unit is currently dedicated to the above-described C. C. Fristoe "B" Federal NCT-2 Well No. 20, which location is also unorthodox and was approved by Division Administrative Order NSL-3760.

It is our understanding that Texaco intends to directionally drill this well from a surface location 2269 feet from the North line and 2459 feet from the East line of Section 35 to a targeted bottomhole location 2610 feet from the North and East lines of Section 35 and complete in both pools in order to further develop untapped reserves underlying this 40-acre tract.

This application has been duly filed under the provisions of Division Rules 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999, and 111.C (2).

The applicable drilling window or "producing area" within both the Justis-Blinebry and Justis-Tubb-Drinkard Pools for this wellbore shall include that area within the subject 40-acre oil spacing and proration unit comprising the SW/4 NE/4 (Unit G) of Section 35 that is:

- (a) no closer than 330 feet to the north and east boundaries of the unit; and
- (b) no closer than 10 feet to the south and west boundary of this unit.

By the authority granted me under the provisions of Division Rule 104.F(2), the above-described non-standard subsurface oil producing area/bottomhole oil well location is hereby approved.

The operator shall comply with all provisions of Division General Rule 111 applicable in this matter.

Set for PAC

Sincerely,

Lori Wrotenbery

Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Hobbs

U. S. Bureau of Land Management - Carlsbad

File: NSL-3760