

NSL

2/11/97

HINKLE, COX, EATON, COFFIELD & HENSLEY,

L.L.P.

ATTORNEYS AT LAW

218 MONTEZUMA POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554 FAX (505) 982-8623

LEWIS C. COX, JR. (1924-1993)
CLARENCE E. HINKLE (1908-1985)OF COUNSEL
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MARGARET CARTER LUDEWIG
S. BARRY PAISNER
WYATT L. BROOKS*
DAVID M. RUSSELL*
ANDREW J. CLOUTIER
STEPHANIE LANDRY
KIRT E. MOELLING*
DIANE FISHER
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TIMOTHY R. BROWN
JAMES C. MARTIN
KATHLEEN M. HALL
DANNY W. JARRETT
MATTHEW E. FORBES*

*NOT LICENSED IN NEW MEXICO

January 22, 1997

Hand Delivered

Michael E. Stogner
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Pursuant to Division Rule 104.F(2), Pogo Producing Company hereby applies for administrative approval of an unorthodox oil well location for the following well:

Riverbend "A" Fed. Well No. 10
330 feet FNL & 1160 feet FEL
NE $\frac{1}{4}$ NE $\frac{1}{4}$ §23, Township 24 South, Range 29 East, NMPM
Eddy County, New Mexico

The well will be drilled to test the Bone Spring formation (East Pierce Crossing-Bone Spring Pool). Well spacing is 40 acres.

The proposed location is non-standard due to archaeological and topographic reasons. The original proposed location was 330 feet FNL and 660 feet FEL. Attached as Exhibit A is an archaeological study recommending that the location be moved to an alternate location 1060 feet FEL (400 feet west of the original location). In addition, due to some degree of slope at the location 1060 feet FEL, Barry Hunt at the BLM asked that the location be moved an additional 100 feet further west. Attached as Exhibit B is a topographic map which shows that the wellsite is at a flat location.

Submitted as Exhibit C is a land plat around the proposed well, showing Pogo-operated acreage outlined in yellow (comprised of a single federal lease). The well is only moving toward Pogo acreage, and thus no other operator has been notified of this application.

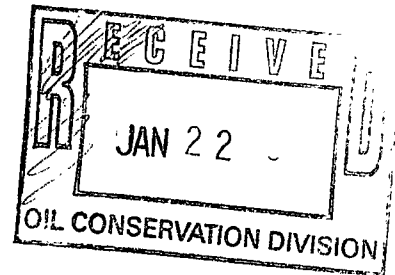
A BLM-approved APD is submitted as Exhibit D. This

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

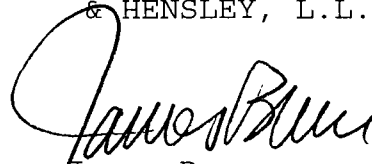
POST OFFICE BOX 2043
ALBUQUERQUE, NEW MEXICO 87103
(505) 768-1500
FAX (505) 768-1529



application is submitted in triplicate. Please call me if you need anything further on this matter.

Very truly yours,

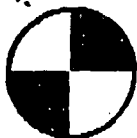
HINKLE, COX, EATON, COFFIELD
& HENSLEY, L.L.P.

A handwritten signature in cursive script, appearing to read "James Bruce".

James Bruce

Attorneys for Pogo Producing
Company

pogoaal.uol

**Powers Elevation Co., Inc.**

P.O. Box 440889, Aurora, CO 80044-0889
Phone 303-321-2217
Toll Free 1-800-824-2550
FAX 303-321-2218

RECEIVED

NOV 13 1996

MIDLAND

November 7, 1996

Mr. Bucky Ritchie
WTWT, Inc.
P.O. Box 1401
Midland, TX 79702

Dear Mr. Ritchie:

Enclosed is the cultural resources inventory report for the following Pogo Producing Company project:

The Horseshoe 12M No.1, Riverbend "A" Federal No. 10,
Riverbend "B" Federal No. 11, Riverbend "24D" Federal No. 1,
and Canyon "23I" Federal Comm. No. 1
Well Locations and Access Roads,
Eddy County, New Mexico

A BLM Class III pedestrian survey and an inspection of existing records were performed for this location by Powers Elevation Co., Inc., at the Bureau of Land Management, Roswell District, Carlsbad Resource Area office and the State of New Mexico Archaeological Records Management Section. The records check of Sections 12, 23, and 24, T.24S., R.29E., revealed twelve previously recorded prehistoric sites within one mile of the project area. One of these sites, LA49613 (first recorded in 1984 by PAC), is not where it was plotted and could not be relocated, even by an additional survey conducted in the immediate area. Another site, LA43510, was accurately recorded in 1977 by the BLM, even though a subsequent 1987 re-recorded survey by NMAS expanded the site boundary to the north. The current work suggests that the site ends short of the county road and the 1977 site map is more reflective than the 1987 map. Further, it should be noted that the BLM map has erroneously switched and labelled LA numbers on one of their master maps. LA43510 is erroneously labelled LA49611 and vice versa. Of the remaining sites, the nearest site is LA49611, which is located approximately 1,000 feet southwest of the project area. During our survey, one previously recorded site was revisited (as discussed above), and its form updated, one new prehistoric site was found and recorded, and six isolated occurrences were found and recorded. The new prehistoric site is considered eligible to the NRHP based on the

EXHIBIT

A

Mr. Bucky Ritchie
November 7, 1996
Page Two

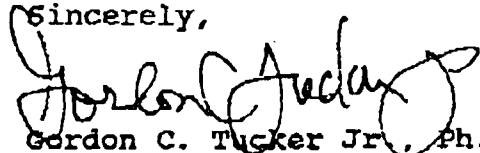
artifact assemblage, the high potential for buried cultural deposits, and the possibility that it may yield additional information beyond that documented in the current survey. Therefore, subsurface testing is needed to determine the extent and diversity of possible buried intact deposits.

We have recommended that the proposed well locations and access road for the original Canyon "23I" Fed. Comm. No. 1 and the Riverbend "B" Fed. No. 11 be given archaeological clearance without any stipulations. Clearance is also recommended for the Horseshoe "12M" Fed. No. 1 well location, but the access road, not being staked, is not given clearance at this time.

Additionally, we have recommended that Riverbend "A" Fed. No. 10 well be moved 400 ft. to the west to avoid Site LA115520 and that a barrier, such as a fence, be constructed along the east boundary; and, that Riverbend "24D" Fed. No. 1 well also be moved 400 feet to the east to avoid Site LA115520. A barrier, such as a fence, should be placed along the west boundary of the alternate Riverbend "24D" Fed. No. 1 well location. The original access road to the Riverbend "A" Fed. No. 10 well location is recommended, as it will stop on the well location. The original access road for Riverbend "24D" Fed. No. 1, which approaches from the northwest corner, is not recommended and should be abandoned for the alternative access road, which enters the alternative Riverbend "24D" Fed. No. 1 well location from the south.

We appreciate the opportunity to have conducted this work on your behalf. If you have any questions regarding our work or this report, please do not hesitate to contact me. Thank you.

Sincerely,



Gordon C. Tucker Jr., Ph.D.
Manager
Archaeology Department

enclosures

cc: Richard Wright, Pogo Producing Company
BLM Carlsbad Resource Area (2)
Mike Robbins, Laughlin-Simmons of Texas

**The Horseshoe 12M No. 1, Riverbend "A" Federal No. 10,
Riverbend "B" Federal No. 11, Riverbend "24D" Federal No. 1,
and Canyon "23I" Federal Comm. No. 1
Well Locations and Access Roads,
Eddy County, New Mexico:
A Cultural Resources Inventory**

**Written By:
Joe Ben Sanders
Project Archaeologist**

**Gordon C. Tucker Jr., Ph.D.
Principal Investigator**

**Prepared By:
ARCHAEOLOGY DEPARTMENT
POWERS ELEVATION CO., INC.
P.O. Box 440889
Aurora, CO 80044-0889**

**Prepared For:
POGO PRODUCING COMPANY
P.O. Box 10340
Midland, Texas 79702**

**Date:
November 7, 1996
Project # 96-NM-35**

NMCRIS Project Activity Number 45120

ABSTRACT

On October 10 and 13, 1996, Joe Ben Sanders, of Powers Elevation Co., Inc., performed an archaeological survey of five proposed well locations, two alternate well locations, and their associated access roads in Eddy County, New Mexico. The work was conducted at the request of Pogo Producing Company. The proposed well locations and access road occur on federal surface/federal mineral lands administered by the Carlsbad Resource Area, Roswell District, Bureau of Land Management. A project total of 32.3 acres was intensively inventoried for cultural resources.

During the inventory, six prehistoric isolates and one new prehistoric site LA115520 were found and recorded. One previously recorded site LA43510 which was believed to occur in the project area, was revisited and found to be outside the project area. The site map was updated and replotted on the appropriate topographic map. Another previously recorded site, LA49613, was originally plotted as being in the project area, but we failed to relocate it and it appears to have been misplotted. Additional survey in the immediate vicinity of the project area also failed to locate it. Apparently, Site LA49613 is located somewhere north and well outside the project area, judging from the site map and the description of the site as being located on a knoll and having a nearby rock outcrop. Archaeological clearance for the Horseshoe "12M" Fed. No. 1 well location, the Riverbend "B" Fed. No. 11, and the Canyon "23I" Fed. Comm. 1 well location and associated access roads is recommended without stipulations. Archaeological clearance is not recommended for the proposed original Riverbend "A" Fed. No. 10 or the original Riverbend "24D" Fed. No. 1 well locations since newly found and recorded Site LA115520 is located on these two originally proposed well locations and this site is considered eligible to the NRHP. Alternate well locations were inventoried west of the originally proposed Riverbend "B" Fed. No. 10 well location and east of the proposed Riverbend "24D" Fed. No. 1 well location, well off the sandy rise on which the site occurs. A new access road was flagged for the Riverbend "24D" Fed. No. 1 well location: it approaches the proposed well location from the south, well east of the sandy rise on which the site occurs. Archaeological clearance is recommended for the alternate Riverbend "A" Fed. No. 10 and the alternate Riverbend "24D" Fed. No. 1 well locations, and alternate access roads, with the stipulation that the newly discovered site be avoided and that physical barriers (e.g., fences) be erected along the east side of the alternate River Bend "A" Fed. No. 10 well location and along the west side of the alternate Riverbend "24D" Fed. No. 1 well location, and that the original access road be abandoned in favor of the alternate access road approaching the alternate Riverbend "24D" Fed. No. 1 well location from the south.

INTRODUCTION

An archaeological inventory has been completed for the proposed Horseshoe "12M" Federal No. 1, Riverbend "A" Federal No. 10, Riverbend "B" Federal No. 11, Riverbend "24D" Federal No. 1, and Canyon "23I" Federal Comm. No. 1 well locations and access roads in Eddy County, New Mexico (Figure 1). Two alternate well locations and one alternate access road were also inventoried after a newly discovered prehistoric site was found to occur on two of the original well locations. The archaeological survey was performed by Powers Elevation Co., Inc. (Powers) at the request of Pogo Producing Company. Proposed impacts occur on federal surface/federal mineral rights lands administered by the Carlsbad Resource Area, Roswell District, Bureau of Land Management.

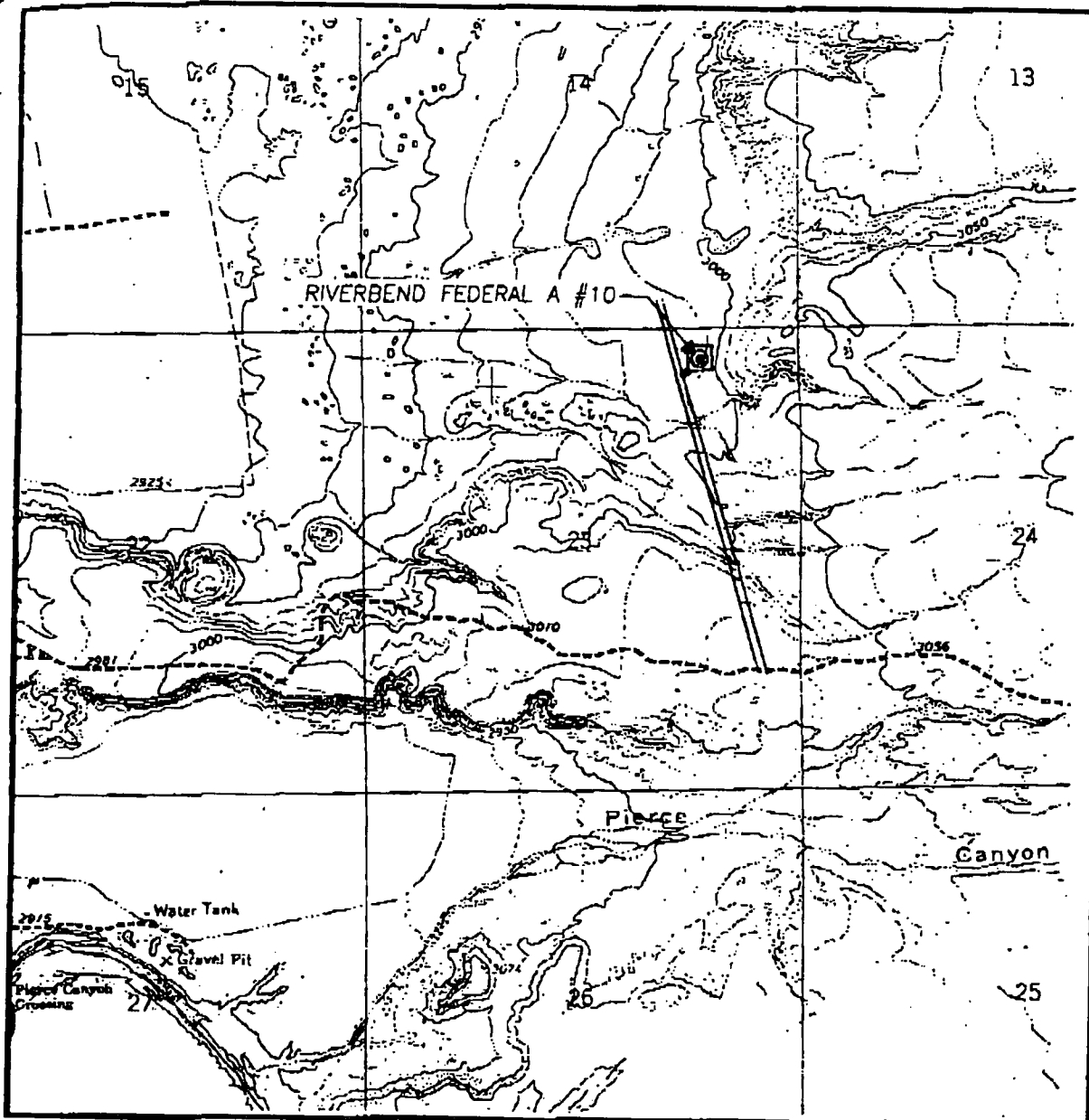
The proposed Horseshoe "12M" Fed. No. 1 well location is staked at 330 ft. FSL, and 330 ft. FWL, Section 12, T.24S., R.29E. (Figure 2). An area measuring 400 ft. long and 400 ft. wide (3.7 acres) was inventoried for this proposed location. No access road was staked because its placement is pending and will be inventoried at a later date.

The original Riverbend "A" Fed. No. 10 well location is positioned at 330 ft. FNL and 660 ft. FWL, Section 23, T.24S., R.29E. (Figure 2). An area measuring 400 ft. long and 400 ft. wide (3.7 acres) was inventoried for the proposed location. The proposed access road leaves an existing northwest-trending bladed pipeline corridor, trends northeast 300 ft., and ends on the southwest corner of the proposed well location. A 300 ft. long and 100 ft. wide (0.7 acre) corridor was inventoried for the proposed access road. Upon discovery of new site LA115520, an additional 400 ft. long and 400 ft. wide area (3.7 acres) was inventoried for an alternate location. The alternate Riverbend "A" Fed. No. 10 is positioned at 330 ft. FNL and 1060 ft. FEL, Section 23, T.24S., R.29E., or 400 ft. west of the original well location. The well location will be accessed by the original access road.

The proposed Riverbend "B" Fed. No. 11 well location is staked at 330 ft. FNL and 1980 ft. FEL, Section 23, T.24S., R.29E. (Figure 2) An area measuring 400 ft. long and 400 ft. wide (3.7 acres) was inventoried for this proposed location. For the proposed access road, a corridor measuring approximately 800 ft. long and 100 ft. wide (1.8 acres) was inventoried. The proposed access road leaves an existing northwest trending bladed pipeline corridor, trends 800 ft. west, and enters the southeast portion of the proposed well location.

The original Riverbend "24D" Fed. No 1 well location was positioned at 330 ft. FNL and 330 ft. FWL, Section 24, T.24S., R.29E. (Figure 2). A 400 ft. long and 400 ft. wide area (3.7 acres) was inventoried. In order to avoid Site LA115520, an alternate

LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

SEC. 23 TWP. 24-S RGE. 29-E

SURVEY _____ N.M.P.M.

COUNTY _____ EDDY

DESCRIPTION 330' FNL & 1160' FEL

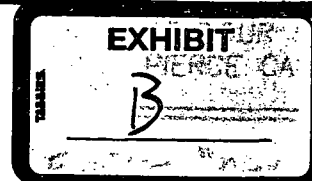
ELEVATION _____ 2991'

OPERATOR POGO PRODUCING COMPANY

LEASE RIVERBEND FEDERAL A

U.S.G.S. TOPOGRAPHIC MAP

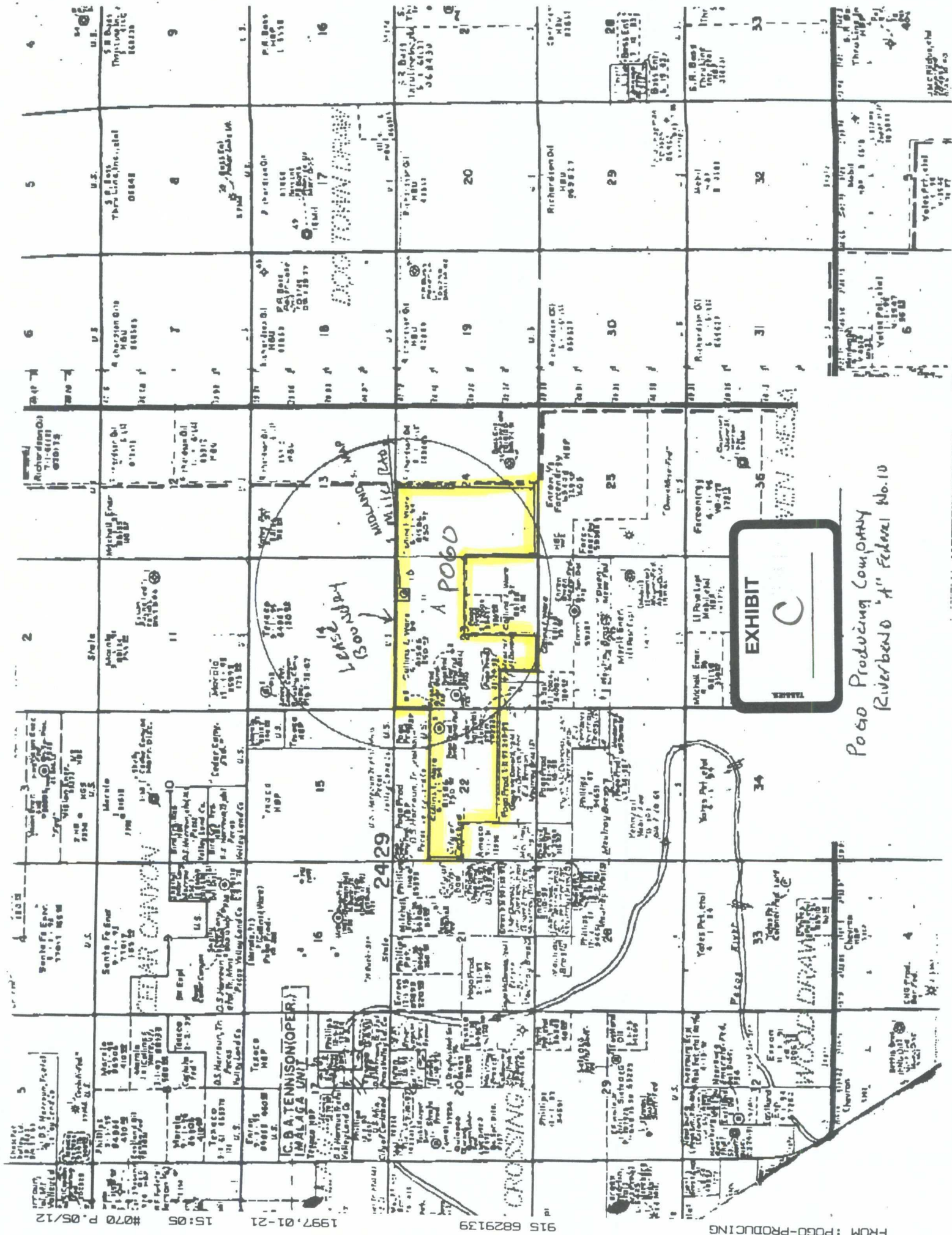
PIERCE CANYON, N.M.



INTERVAL:
ON - 10'
= EXISTING ROAD

**JOHN WEST ENGINEERING
HOBBS, NEW MEXICO**

(505) 393-3117



Pogo Producing Company
Riverbend "A" Federal No. 10

Form 3160-3
(July 1992)**OPERATOR'S COPY**SUBMIT IN THE **APPROPRIATE**
(Other instructions on
reverse side)FORM APPROVED
OMB NO. 1004-0136
Expires: February 28, 1995UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

DEC 23 1996

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

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

330' FNL & 1160' FEL of Section 23

At proposed prod. zone

Same

Subject to
Like Approval
by State

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

5 miles east southeast of Malaga, N.M.

15. DISTANCE FROM PROPOSED

LOCATION TO NEAREST
PROPERTY OR LEASE LINE, FT.

330'

(Also to nearest drig. unit line, if any)

18. DISTANCE FROM PROPOSED LOCATION

TO NEAREST WELL, DRILLING, COMPLETED,
OR APPLIED FOR, ON THIS LEASE, FT.

1320'

16. NO. OF ACRES IN LEASE

1040

19. PROPOSED DEPTH

8250'

17. NO. OF ACRES ADJACENT

TO THIS WELL

40

20. ROTARY OR CABLE TOOL

Rotary

21. ELEVATIONS (Show whether DV, HT, GR, etc.)

2991' Ground Level

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"	48# H-40	500'	600 sx (circ) SITUATION
11"	8-5/8"	24,32 J-55	2950'	1200 sx (circ)
7-7/8"	5-1/2"	15.5, 17# J55, 80	8250'	900 sx (1900')

CARLSBAD CONTROLLED WATER BASIN

The operator proposes to drill to a depth sufficient to test the Delaware and Bone Springs for oil. Specific programs are outlined in the following attachments:

DRILLING PROGRAMSURFACE USE AND OPERATING PLAN

EXHIBIT A - ROAD MAP

EXHIBIT B - EXISTING WELL MAP

EXHIBIT C - LOCATION AND ACREAGE DEDICATION PLAT

EXHIBIT C-1 TOPO MAP

EXHIBIT D - DRILLING AND RIG LAYOUT

EXHIBIT E - 3M BOP EQUIPMENT

EXHIBIT

D

NOV 26

RECEIVED

APPROVAL SUBJECT TO
GENERAL REQUIREMENTS AND
SPECIAL STIPULATIONS
ATTACHED

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

James H. C. Rute

TITLE

Agent

DATE

11/23/96

(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

Gary L. Ferguson

TITLE

Adm. Manager

DATE

12/13/96

*See Instructions On Reverse Side

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the

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

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 50371	Pool Name Pierce Crossing, East (B.S.)
Property Code	Property Name RIVERBEND FEDERAL A	Well Number 10
OCRID No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 2991'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
A	23	24 S	29 E		330	NORTH	1160	EAST	EDDY

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.

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

		<p>Exhibit "C"</p>

OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

James M.C. Ritchie, Jr.
Signature

James M.C. Ritchie, Jr.
Printed Name

Agent

Title

11/23/96

Date

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

NOVEMBER 8, 1996

Date Surveyed

CDG

Signature & Seal of
Professional Surveyor

Ronald J. Eidson
11-12-96
11-14-96

Certification No. JOHN W. WEST
RONALD J. EIDSON
PROFESSIONAL SURVEYOR

576
3239
12641

HINKLE, COX, EATON, COFFIELD & HENSLEY,
L.L.P.

ATTORNEYS AT LAW

218 MONTEZUMA POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

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CLARENCE E. HINKLE (1901-1985)

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STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
ROBERT P. TINNIN, JR.
MARSHALL G. MARTIN
MASTON C. COURTNEY*
DON L. PATTERSON*
DOUGLAS L. LUNSFORD
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR.
WILLIAM B. BURFORD*
RICHARD E. OLSON
RICHARD R. WILFONG*
THOMAS J. MCBRIDE
NANCY S. CUSACK
JEFFREY L. FORNACIARI

JEFFREY D. HEWETT
JAMES BRUCE
JERRY F. SHACKELFORD*
JEFFREY W. HELLBERG*
W. F. COUNTISS*
ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS*
GARY D. COMPTON*
W. H. BRIAN, JR.*
RUSSELL J. BAILEY*
STEVEN D. ARNOLD
THOMAS D. HAINES, JR.
GREGORY J. NIBERT
FRED W. SCHWENDIMANN
JAMES M. HUDSON
THOMAS E. HOOD*
REBECCA NICHOLS JOHNSON
STANLEY K. KOTOVSKY, JR.

January 24, 1997

*NOT LICENSED IN NEW MEXICO

Hand Delivered

Michael E. Stogner
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Stogner:

On January 22nd, Pogo Producing Company applied for administrative approval of an unorthodox oil well location for the following well:

Riverbend "A" Fed. Well No. 10
330 feet FNL & 1160 feet FEL
NE $\frac{1}{4}$ NE $\frac{1}{4}$ §23, Township 24 South, Range 29 East, NMPM
Eddy County, New Mexico

Attached as Exhibit A to the application was a portion of an archaeological study. Submitted with this letter is a complete copy of the study.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY, L.L.P.



James Bruce

Attorneys for Pogo Producing
Company

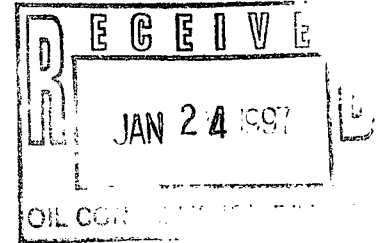
pogooal.uol

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



CMD .: ONGARD 01/27/97 15:25:52
OG6C101 C101-APPLICATION FOR PERMIT TO DRILL OGOMES -EMFC

OGRID Idn : 17891 API Well No: 30 15 29319 APD Status(A/C/P): A
Opr Name, Addr: POGO PRODUCING CO Aprvl/Cncl Date : 12-18-1996
PO BOX 10340
MIDLAND, TX 79702

Prop Idn: 20111 RIVERBEND A FEDERAL Well No: 10

	U/L	Sec	Township	Range	Lot	Idn	North/South	East/West
	---	---	-----	-----	-----	-----	-----	-----
Surface Locn : A	23	24S	29E				FTG 330 F N	FTG 1160 F E
OCD U/L : A		API	County	15				

Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): O Cable/Rotary (C/R) : R
Lease typ(F/S/P/N/J/U/I): F Ground Level Elevation : 2991

State Lease No: Multiple Comp (Y/N) : N
Prpsd Depth : 8250 Prpsd Frmtn : BONE SPRING

E0009: Enter data to modify record

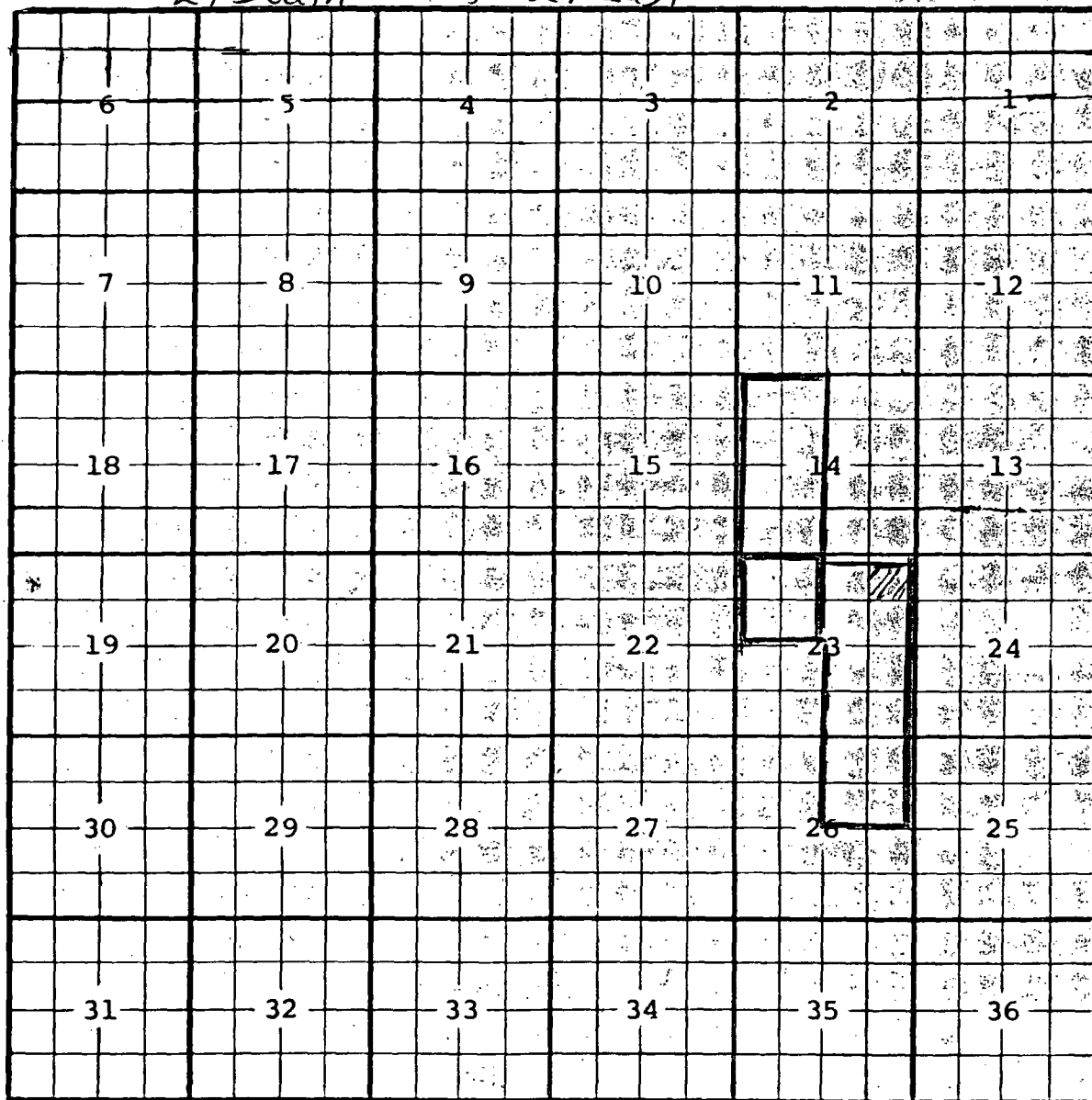
PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06 CONFIRM
PF07	PF08	PF09 PRINT	PF10 C102	PF11 HISTORY	PF12

County Eddy

Pool East Pierce Crossing - Bone Spring

TOWNSHIP 24 South

Range 29 East NMPM



Description: NW 1/4 Sec. 23 (R-10234, 11-7-94)

Ext. E 1/2 Sec. 23, NE 1/4 Sec. 26 (R-10568, 4-1-96) Ext. W 1/2 Sec. 14 (R-10713, 11-26-96)

**HINKLE, COX, EATON, COFFIELD & HENSLEY,
L.L.P.**

ATTORNEYS AT LAW

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SANTA FE, NEW MEXICO 87504-2068
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THOMAS M. HNASKO
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GARY D. COMPTON*
W. H. BRIAN, JR.*
RUSSELL J. BAILEY*
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THOMAS D. HAINES, JR.
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FRED W. SCHWENDIMANN
JAMES M. HUDSON
THOMAS E. HOOD*
REBECCA NICHOLS JOHNSON
STANLEY K. KOTOVSKY, JR.

January 28, 1997

*NOT LICENSED IN NEW MEXICO

Hand Delivered

Michael E. Stogner
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Stogner:

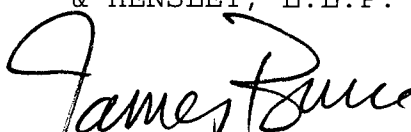
On January 22nd, Pogo Producing Company applied for administrative approval of an unorthodox oil well location for the following well:

Riverbend "A" Fed. Well No. 10
330 feet FNL & 1160 feet FEL
NE $\frac{1}{4}$ NE $\frac{1}{4}$ §23, Township 24 South, Range 29 East, NMPM
Eddy County, New Mexico

The well will be drilled to test the Bone Spring formation (East Pierce Crossing-Bone Spring Pool). In addition to an unorthodox location for the Bone Spring formation, Pogo requests approval of an unorthodox location for the Delaware formation. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY, L.L.P.



James Bruce

Attorneys for Pogo Producing
Company

pogooa1.uol

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

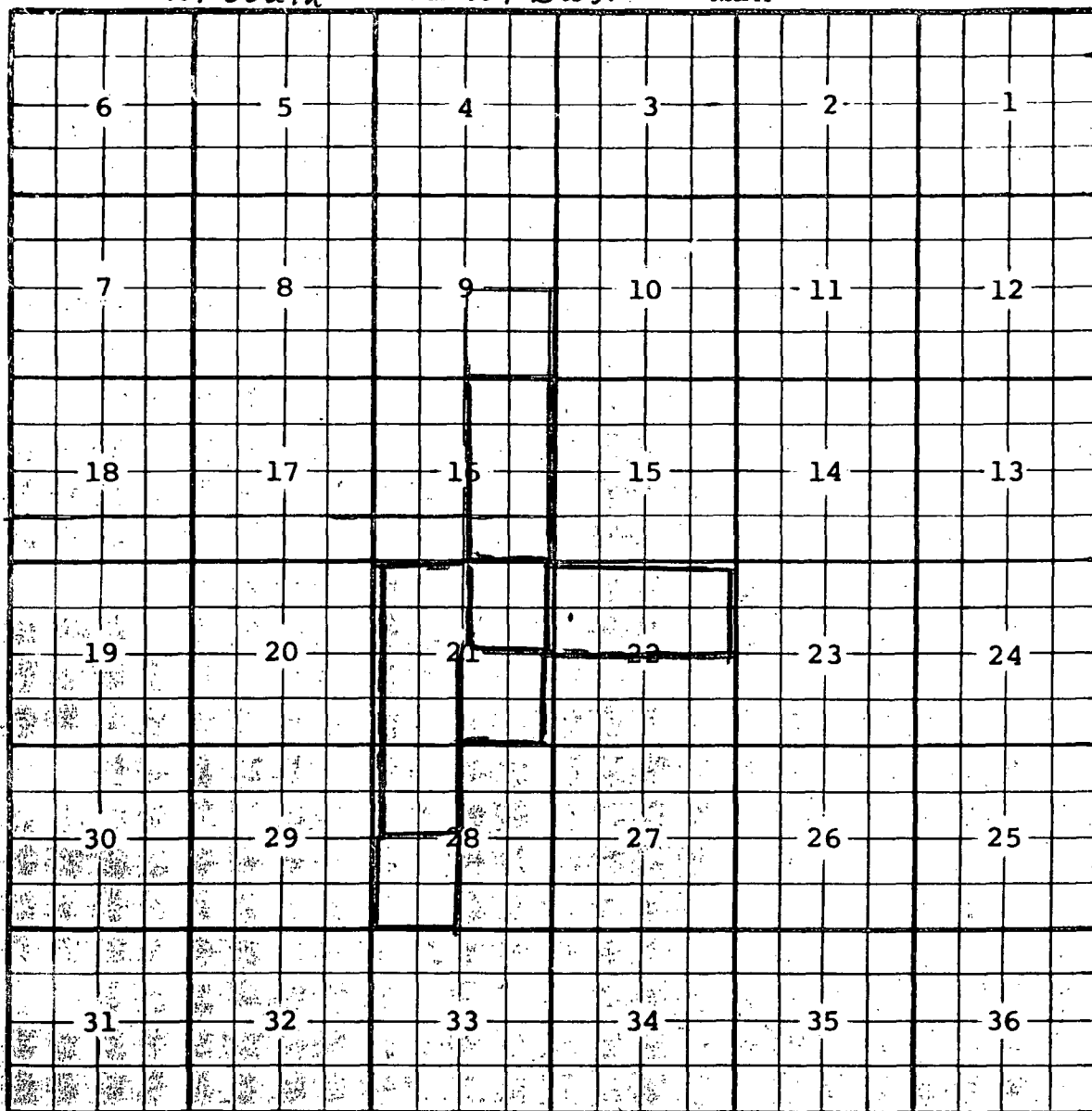
POST OFFICE BOX 3580
MIDLAND, TEXAS 79702
(915) 683-4691
FAX (915) 683-6518

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

COUNTY EddyPOOL Cedar Canyon - DelawateTOWNSHIP 24 SouthRANGE 29 East

NMPM



Description: SE¹/₄ Sec 9 (R-5334, 12-1-76)

Ext: E¹/₂ Sec. 16 (R-10187, 9-6-94) Ext: NE¹/₄ Sec. 21 (R-10377, 6-2-95)

Ext: W¹/₂ Sec. 21, NW¹/₄ Sec. 28 (R-10568, 4-1-96) Ext: SE¹/₄ Sec. 21 (R-10591, 5-8-96)

Ext: N¹/₂ Sec. 22 (R-10664, 9-16-96) Ext: SW¹/₄ Sec. 28 (R-10724, 1-8-97)