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	[B]	Offset Operators,	Leaseholders or S	urface Owner		2,05,2
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	[D]	U.S. Bureau of Land	or Concurrent App Management - Commission			
	[E]	For all of the abo	ve, Proof of Notifi	cation or Publ	ication is Attac	hed, and/or,
	[F]	U Waivers are Attac	ched	x		· .
[3] INFC	ORMAT	ION / DATA SUBM	ITTED IS COM	PLETE - State	ment of Unders	standing

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, -RI, ORRI) is common. I further verify that all applicable API Numbers are included. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

JAMES BRUCE P.O. BOX 1056 SANTA FE, NM 87504

Note:	Statement must be completed by an	individual with supervisory capacity.
/	Paris	1 1

Date

Print or Type Name

Idulles Signature

JAMES BRUCE

ATTORNEY AT LAW

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POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

December 31, 1997

Hand Delivered

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

Dear Mr. Stogner:

Pursuant to Division Rule 104.F(2), KCS Medallion Resources, Inc. hereby applies for administrative approval of an unorthodox gas well location and a non-standard gas spacing and proration unit for the following well:

RGD Well No. 1 660 feet FNL & 840 feet FEL §19, Township 21 South, Range 27 East, NMPM Eddy County, New Mexico

Attached as Exhibit A is a Form C-102 for the well. The well will be drilled to approximately 11,500 feet, to test the Morrow formation (Burton Flat-Morrow Gas Pool). Well spacing is 320 acres, with wells to be located no closer than 1980 feet from the end line and 660 feet from the side line of the unit. The N½ of Section 19 will be dedicated to the well, forming a non-standard 315.34-acre gas spacing and proration unit. The non-standard unit is due to a variation in the public land surveys.

Attached as Exhibit B is an isopach map of the Morrow "A" Sand. The general trend of the Morrow in this area is northwestsoutheast. Most of the good wells in the immediate area have more than 10 feet of net sand thickness (usually 15 feet). The further west the well is located in the spacing unit, the greater the chances the sand will be thin and non-commercial. In addition, the nearest well, the Marathon Pioneer Fed. Well No. 1, in the SW4NE4 of Section 19, was not productive, and it is best to move away from this well. Drilling at the proposed location should enable the well to test approximately 15 feet of net sand, and substantially increase the chances of drilling a successful well. Attached as Exhibit C is a land plat of the area. The offset operators are as follows:

<u>S% §17</u> Yates Petroleum Corporation

<u>N½ §20</u> OXY USA Inc.

Attached as Exhibit D is a copy of the notice letter sent to the offset operators on this date.

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

Very truly yours,

• • •

James Bruce

Attorney for KCS Medallion Resources, Inc.

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RGD PROSPECT Eddy county, new mexico

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Scale: 1"=2000' By: W. A. Siruta Date: 11/97



KC5 Medallion Resources, Inc. A KCS Energy Company RGD PROSPECT

EDDY COUNTY, NEW MEXICO N/2 SECTION 19-21S-27E

UNORTHODOX LOCATION APPLICATION

Scale: 1"=2000' By: W. A. Siruta Date: 11/97

EXHIBIT C-

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JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056

SANTA FE, NEW MEXICO 87504

SUITE B 612 OLD SANTA FE TRAIL SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

December 31, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Yates Petroleum Corporation 105 South 4th Street Artesia, New Mexico 88210

OXY USA Inc. P.O. Box 50250 Midland, Texas 79710

Ladies and Gentlemen:

On December 31, 1997, KCS Medallion Resources, Inc. filed an application at the New Mexico Oil Conservation Division seeking administrative approval of an unorthodox gas well location for the RGD Well No. 1, located in the N½ of Section 19, Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico. The application also requests approval of a non-standard gas spacing and proration unit. A copy of the application is enclosed. KCS Medallion's records show that you own an interest offsetting the above well. If you object to the unorthodox location, you must notify the Division in writing no later than 20 days from the date of this letter. The Division's address is 2040 South Pacheco Street, Santa Fe, New Mexico 87505 (Attention: Michael E. Stogner).

Very truly yours,

James Bruce

Attorney for KCS Medallion Resources, Inc.



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