NSL 3/17/98

Mid-Continent Region Exploration/Production

MUTDK17

February 23, 1998

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

RE: Application for Non-Standard Location San Juan 28-7 Unit Well # 216

Dear Mr. Stogner,

The proposed recompletion of this well in the Mesaverde requires a non-standard order. This well is located in Section 8, T-27-N, R-7-W Rio Arriba County, New Mexico and is currently producing from the Basin Dakota. The Mesaverde/ Dakota pool rules require a standard location to be 790' from the center Section line. This well is located 2290' FNL & 980' FEL. The well is only 350' from the center section line. After searching all files a call was placed to the OCD to see if a non-standard location order was granted for the Dakota. No order could be found. We would like to request a non-standard location order be given for the Dakota and the Mesaverde.

As shown on the attached production for the Dakota, there is insufficient evidence to justify drilling stand alone wells. Utilization of the San Juan 28-7 Well #216 will prevent economic waste by allowing access to the Mesaverde in an existing wellbore. An application to downhole commingle production utilizing the subtraction method has been filed.

The offset operator plat shows the operators that could be affected by this non-standard location. Conoco, Inc is the only offset operator.

A non-standard location order is requested based on the reasons given. If there are further questions concerning this application please call me at (915) 686-5798.

Sincerely.

Kay Maddox

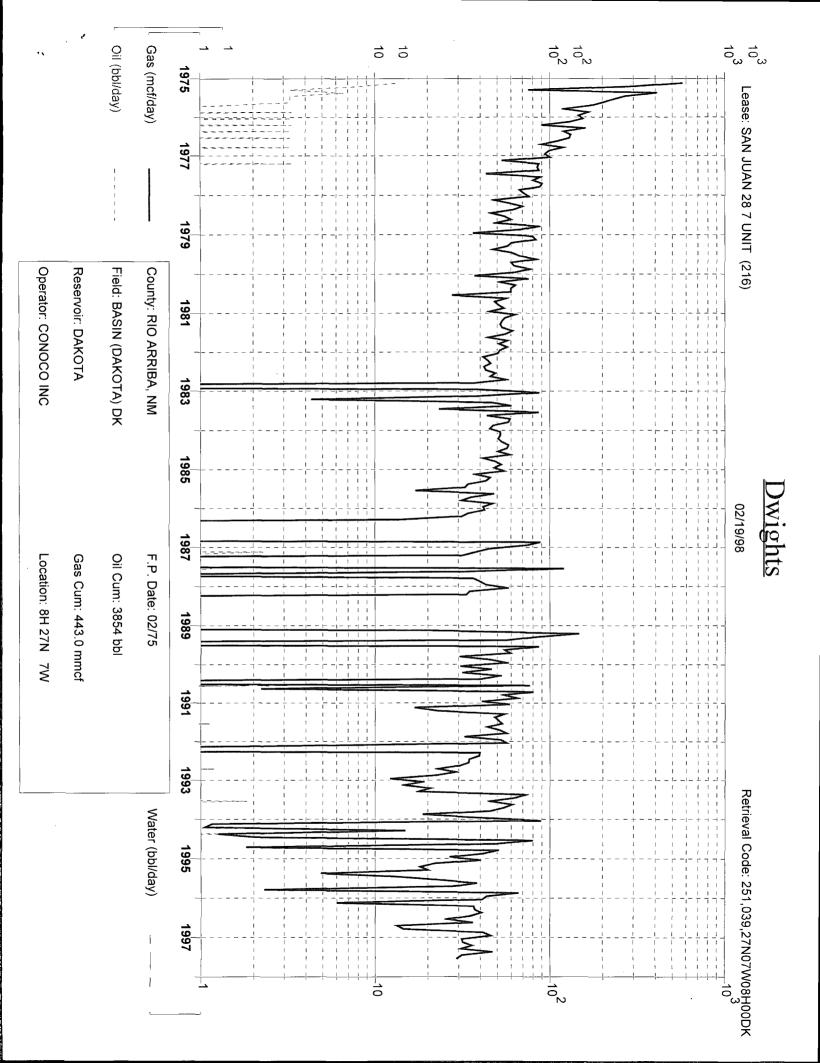
Regulatory Agent

cc: Oil Conservation Division - Aztec

William J LeMay, Director - OCD, Santa Fe

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





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State of New Mexico Energy, Minerals & Natural Resources Department

Revised February 21, 1994 instructions on back

District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410

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

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

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

AMENDED REPORT

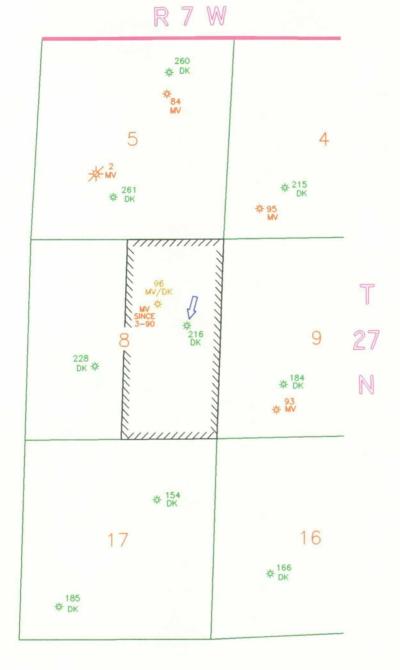
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Form C-102 Supersedes C-128 Effective 1-1-65

All distances must be from the outer boundaries of the Section

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Operator EL PASO	NATURAL GAS	COMPANY	SAN JUAN 28-	-7 UNIT (SF-078569) 216
Unit Letter	Section 8	Township 27 NORTH	Romge 7 WEST	County RIO ARRIBA
Actual Footage Loc 2290		ORTH line on	d 980 fee	et from the EAST
Ground Level Elev. 6726	Producing For	MAKOTA	P∞1 BASIN DAI	COTA Dedicated Acreage: Acres
2. If more th	•			or hachure marks on the plat below.
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this form i No allowal	is "no," list the f necessary.) ble will be assign	owners and tract des	scriptions which have a	consolidated (by communitization, unitization, th interests, has been approved by the Commis-
			SF-078569	CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Name Drilling Clerk Position El Paso Natural Gas Co. Company April 18, 1974 Date
			SF-078570	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 knowledge and belief. Date Survey 15 Janch 1974 Heatistic retrission is connected and additional curvey 15 Janes P. Lease

90 1320 155. 1980 2310 2540



SAN JUAN 28-7 UNIT RIO ARRIBA CO., N.M.

NOTES		CONOCO MIDLAND	- T. V 201 NA.		
NOTE:	DATE: 02/21/98				
LOCATION IS NON-STANDARD TOWARDS	DRAWN BY: GLG	CONOCO 28-7 UNIT MESAVERDE & DAKOTA PRODUC San Juan 28-7 Unit #216 Non-Standard Location			
AN INTERIOR UNIT LINE. CONOCO OPERATES ALL WELLS IN SJ 28-7 UNIT.	CHECKED BY:				
of Environment weeks in our 25 % only.	APPROVED BY:	STATE COUNTY WELL DRAWN			
	SCALE: 1" = 2640'	30 \ 039 \ 20875	28-7_216		
	STATE PLANE COORDINATES REFERRED TO NAD27 - N.M. WEST STATE PLANE COORDINATES ZONE - 3003	CONOCO INC. OFFICE 10 DESTA DRIVE WEST MIDLAND, TEXAS 79705			



ADMINISTRATIVE ORDER DHC-1794

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

Attention: Ms. Kay Maddox

San Juan 28-7 Unit No. 216 API No. 30-039-20875 Unit H, Section 8, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Blanco-Mesaverde (Prorated Gas - 72319) and Basin-Dakota (Prorated Gas - 71599) Pools

Dear Ms. Maddox:

Reference is made to your recent application for an exception to Rule 303.A. of the Division Rules and Regulations to permit the above described well to commingle production from the subject pools in the wellbore.

It appearing that the subject well qualifies for approval for such exception pursuant to the provisions of Rule 303.C., and that reservoir damage or waste will not result from such downhole commingling, and correlative rights will not be violated thereby, you are hereby authorized to commingle the production as described above and any Division Order which authorized the dual completion and required separation of the zones is hereby placed in abeyance.

The maximum amount of gas which may be produced daily from the well shall be determined by Division Rules and Regulations or by the gas allowable for each respective prorated pool as printed in the Division's San Juan Basin Gas Proration Schedule.

Production from the subject well shall be allocated as follows:

Gas and oil production from the Basin-Dakota Gas Pool shall be determined utilizing the mid-year average production forecast submitted by the applicant as an attachment to the downhole commingling application. Gas and oil production from the Blanco-Mesaverde Gas Pool shall be determined by subtracting Basin-Dakota Gas Pool production from the well's total monthly oil and gas production.

Administrative Order DHC-1794 Conoco Inc. February 24, 1998 Page 2

The allocation method established herein may be altered at some time subsequent to initiating downhole commingling operations upon request by the operator and for good cause shown.

REMARKS: The operator shall notify the Aztec District Office of the Division upon implementation of the commingling process.

Pursuant to Rule 303.H., the commingling authority granted herein may be rescinded by the Division Director if conservation is not being best served by such commingling.

Approved at Santa Fe, New Mexico on this 24th day of February, 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORÍ WROTENBERY

Director

SEAL

LW/DRC

cc: Oil Conservation Division - Aztec

Bureau of Land Management-Farmington