Mid-Continent Region Exploration/Production

March 17, 1998

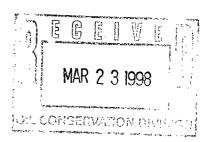
Coal II.

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

RE: Application for Unorthodox Coal Location Hodges # 1Y API # 30-045-24354

Dear Mr. Stogner,

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



Conoco's Hodges #1Y is located in Section 21, T-26-N, R-8-W San Juan County, New Mexico. In addition to standard 790' set-back requirements, orthodox locations for 320 acre spaced, Basin Fruitland Coal requires that locations be situated in the NE/4 and/or SW/4 of any given Section. The Hodges #1Y meets set-back requirements but is situated in the NW/4 of section 21; an orthodox location would be in the SW/4.

In order to prevent economic waste by allowing access to Basin Fruitland Coal reserves in an existing wellbore, and to help mitigate mechanical risk in a newer wellbore (1980 completion); Conoco, respectfully requests that a NW/4, unorthodox location be approved for completion in the Basin Fruitland Coal Peol. Note that Fruitland Coal is untested in direct offset 320's. Conoco, Inc. plans to downhole Fruitland Coal production with existing Ballard Pictured Cliffs production. Conoco, Inc will be filing the downhole commingle and recompletion paperwork with the OCD and the BLM.

The offset operator plat shows that Burlington Resources, Hickman, Hallwood, R. C. Resources, Chateau and Amoco are the offset operators that could be affected by this unorthodox location. Please find enclosed evidence that they have been notified of this application.

An unorthodox location order is requested based on the reasons given in the preceding paragraphs. If there are further questions concerning this application please call me at (915) 686-5798.

Sincerely,

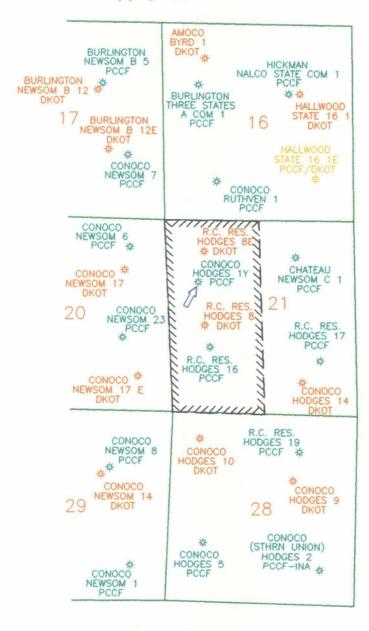
Kay Maddox

Regulatory Agent/ Conoco, Inc.

KM/

cc: Oil Conservation Division - Aztec

R8W



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NOTES		CONOCO MIDLAND				
	DATE: 4/06/98	CONOCO HODGE				
NOTE: HODGES 1Y WILL BE RECOMPLETED TO THE FRUITLAND COAL AND DOWNHOLE	DRAWN BY: GLG	UNORTHODOX COAL LOCATION APPLICATION DOWNHOLE COMMINGLE APPLICATION (BASIN FRUITLAND & BALLARD PC) PLAT SHOWS ALL WELLS IN OFFSET 320'S				
	CHECKED BY:					
COMMINGLED WITH BALLARD PICTURED CLIFFS PRODUCTION.	APPROVED BY:	STATE COUNTY WELL	DRAWING			
	SCALE: 1" = 2640'	30 \ 045 \ 24354	HODG_1Y			
	STATE PLANE COORDINATES REFERRED TO NAD27 - N. M. STATE PLANE COORDINATES ZONE - 3003	CONOCO INC. OFFICE 10 DESTA DRIVE WEST MIDLAND, TEXAS 79705				

District I PO Box 1980, Hobbs. NM 88241-1980 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

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

Submit to Appropriate District Office State Lease - 4 Copies

1000 Rio Brazos Rd. Aztec, NM 87410

Fee Lease - 3 Copies

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

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	4 Property Code							5 Proper					6 We	ll Number
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	7 OGRID No.		^			40 D-		•	tor Name	v 70705	9 Elevation			
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NEW MEXICO OIL CONSERVATION COMMISSION WELL (TATION AND ACREAGE DEDICATION (TAX

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

Location & Elevation Plat All distances must be from the outer bounder less of the 6 Well Ho. Energy Corporation I-Y Section qldanwoT Unit Letter 26 North San Juan 21 Actual Footage Location of Well: feet from the North Ground Level Elev. Producing Formation Dedicated Acreage: 6397 Pictured Cliffs BALLARD 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc? If answer is "yes," type of consolidation ... If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Name George Lapaseotes Pres. Powers Elevation Position ∠od Agent Consultant for 860 Supron Energy Corporation 4/15/80 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 Certificate

1000

1660 1980 2310

Hodges #1Y API # 30-045-24354 Section 21, T-26-N, R-8-W San Juan County, NM

RE: Non-Orthodox location Request

Offset Operators:

Amoco PO Box 800 Denver, CO 80201

Burlington Resources PO Box 4289 Farmington, NM 87499

Chateau Oil & Gas 2515 McKinney Ave STE 840 Dallas, TX 75201

Hallwood Petroleum PO Box 378111 Denver, CO 80237

R C Resources 8340 MeadowRd STE 230 Dallas, TX 75231

J. Felix Hickman Well Has been P&A'd - Inactive

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P 497 374 187

US Postal Service

Receipt for Certified Mail No Insurance Coverage Provided.

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Form 3800 , April 1995	Return Receipt Showing to Whom, Date, & Addressee's Address			
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P 497 374 166

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

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US Postal Service

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US Postal Service

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10	Special Delivery Fee		
	Restricted Delivery Fee		
199	Return Receipt Showing to Whom & Date Delivered		
PS Form 3800 , April 1995	Return Receipt Showing to Whom, Date, & Addressee's Address		
800	TOTAL Postage & Fees	\$	
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