CONOCO

Mid-Continent Region Exploration/Production

March 17, 1998

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

RE: Application for Unorthodox Coal Location Hodges # 11 E API # 30-045-26177 Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400



Dear Mr. Stogner,

Conoco's Hodges #11E is located in Section 27, 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 #11E meets set-back requirements but is situated in the NW/4 of Section 27; an orthodox west half 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 (1985 completion); Conoco, respectfully requests that a NW/4, unorthodox location be approved for completion in the Basin Fruitland Coal Pool. Note that Fruitland Coal is untested in direct offset 320's. Conoco, Inc. plans to complete the Hodges #11E as a single zone Fruitland Coal producer (Dakota is inactive and no longer economic to produce). The BLM has approved Conoco's notice of intent to recomplete (see attached).

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

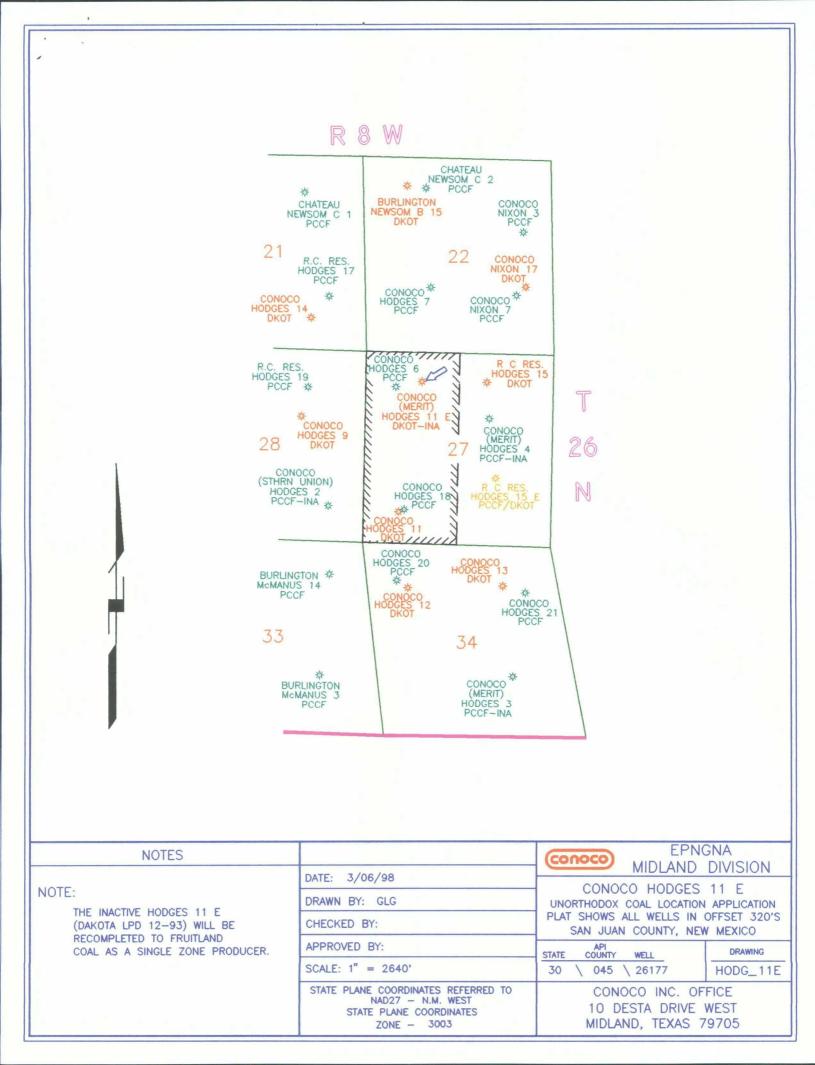
An unorthodox location order is requested based on the reasons given in the preceding paragraphs. If there are further questions concerning this application please call me at (915) 686-5798.

Sincerely,

Maddor

Kay Maddox Regulatory Agent/ Conoco, Inc.

KM/ cc: Oil Conservation Division - Aztec



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District I PO Box 1980, Hobbs. NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719

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District III 1000 Rio Brazos Rd. Aztec, NM 87410

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

State of New Mexico Energy, Minerals & Natural Resources Department

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OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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Form C-102

Hodges #11E API # 30-045-26177 Section 27, T-26-N, R-8-W San Juan County, NM

RE: Non-Orthodox location Request

Offset Operators:

Burlington Resources PO Box 4289 Farmington, NM 87499

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

R C Resources 8340 MeadowRd STE 230 Dallas, TX 75231 P 497 374 044

US Postal Service **Receipt for Certified Mail** No Insurance Coverage Provided. Do not use for International Mail (See reverse) Sent to RC ROSCUPCES Server & Number Number Server & Number

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US Postal Service **Receipt for Certified Mail** No Insurance Coverage Provided. Do not use for International Mail (See reverse)

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3. Address and Telephone N		70705 AFOD (045) 000 F 10 1		30-045-26177
	STE. 100W, MIDLAND, TX.			10. Field and Pool, or Exploratory Area
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<u></u>				San Juan
CHECK	APPROPRIATE BOX(s) TO	INDICATE NATURE OF NO	TICE, REPOR	T, OR OTHER DATA
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14. 1 hereby certify that the Signer (This rose for Federa Approved by	- Sp-	Jerry W, Hoover Title Sr. Conservation Coord Title Ten Lend	inator	- Dave Sept 8, 199 Dave Dave
BLM(6), NMOCD(1), S	SHEAR, PONCA, COST ASST, FILE			States any false, fictitious or fraudulent s



April 14, 1998

Ru: 3-23-98 Susp: 4-13-98 Rehased: 4-14-98

Conoco, Inc. 10 Desta Drive - Suite 100W Midland, Texas 79705-5400

Attention: Kay Maddox

Administrative Order NSL

Dear Ms. Maddox:

Reference is made to your application dated March 17, 1998 for an off-pattern nonstandard Basin-Fruitland coal gas well location for your existing Hodges Well No. 11-E (API No. **30-045-26177**), located 830 feet from the North line and 1510 feet from the West line (Unit C) of Section 27, Township 26 North, Range 8 West, NMPM, Basin-Fruitland Coal (Gas) Pool, San Juan County, New Mexico. According to the well records on file with the New Mexico Oil Conservation Division in Santa Fe, the Hodges Well No. 11-E was initially drilled in 1985 by Southern Union Exploration Company and completed at a standard infill gas well location in the Basin-Dakota Pool within a standard 320-acre gas spacing and proration unit comprising the W/2 of said Section 27.

It is our understanding that Dakota interval is to be abandoned and said well will be plugged back and recompleted up-hole into the Basin-Fruitland Coal (Gas) Pool. This location, pursuant to the "*Special Rules and Regulations for the Basin-Fruitland Coal (Gas) Pool*," as promulgated by Division Order No. R-8768, as amended, is considered to be unorthodox. Further, the W/2 of said Section 27 is to be dedicated to said well in order to form a standard 320-acre gas spacing and proration unit for the Basin-Fruitland Coal (Gas) Pool.

the

By the authority granted me under the provisions of Rule 8 of said special pool rules, the above-described unorthodox coal gas well location for the Hodges Well No. 11-E is hereby approved.

Sincerely,

Lori Wrotenbery Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Aztec U. S. Bureau of Land Management - Farmington