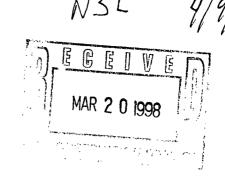


Elizabeth A. Casbeer Regulatory/Compliance Analyst



March 10, 1998

Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Gentlemen:

Under the provisions of NMOCD Rule 104.F(d), ARCO Permian requests administrative approval for unorthodox location for its Washington "33" State #1. U. S. Highway 82 and powerlines has caused us to drill this well 200' FNL and 380'FEL of Section 33, T17S, R28E, Eddy County, New Mexico.

As required, we are submitting a plat showing the subject 40-acre spacing unit with the unorthodox location, a map identifying the adjoining and diagonal encroached-upon leases and wells, and a list of affected parties.

Should you have any questions, please do not hesitate to call me at 915-688-5570 or Dave Pearcy at 915-688-5355. Thank you for your assistance in this matter.

Sincerely,

Elizabeth A. Casbeer

Regulatory/Compliance Analyst

EAC:lc

cc: NMOCD, Artesia, New Mexico

STATE OF TEXAS

COUNTY OF MIDLAND

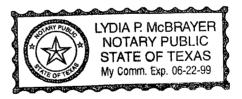
BEFORE ME, the undersigned authority on this day personally appeared Elizabeth A. Casbeer, a Regulatory Compliance Analyst with ARCO Permian, who being by me duly sworn, deposes and states that the persons listed on the foregoing attached list has been sent a copy on March 10, 1998, Oil Conservation Division Form C-101 (and supporting documentation) entitled, "Application For Permit to Drill or Deepen" for the Washington "33" State #1.

ARCO Permian

Li-alud a Ceober
Elizabeth A. Casbeer

SUBSCRIBED AND SWORN TO before me on March 5, 1998, to certify which witness my hand and seal of office.

Hydial MBrayer NOTARY PUBLIC, STATE OF TEXAS



OFFSET OPERATORS WASHINGTON "33" STATE #1

ARCO Permian P. O. Box 1610 Midland, Texas 79702

Marbob Energy Corporation P. O. Box 227 Artesia, New Mexico 88211

Lauretta Phillips Estate Leahy & Shelton Estate P. O. Box 539 Los Olivos, California 93411

Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210

Louis Dreyfus Gas Holdings 14000 Quail Springs Parkway, Suite 600 Oklahoma City, Oklahoma 73134

Marathon Oil Company P. O. Box 552 Midland, Texas 79702 ONE P. BANGER STATE CONTROL OF THE PROPERTY OF

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

			- Engineering Bureau -							
			ADMINISTRATIVE APPLICATION COVERSHEET							
		THIS COV	ERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS							
Applic	eation Acr	(DHC-	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [C-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] -Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]							
[1]	TYPE	OF A	PPLICATION - Check Those Which Apply for [A]							
		[A]	Location - Spacing Unit - Directional Drilling NSL NSP DD DSD							
		Check	One Only for [B] or [C]							
		[B]	Commingling - Storage - Measurement DHC DCTB PLC DPC DOLS DOLM							
		[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery □ WFX □ PMX □ SWD □ IPI □ EOR □ PPR							
.]	NOTI	FICAT	TION REQUIRED TO: - Check Those Which Apply, or Does Not Apply							
-		[A]	☐ Working, Royalty or Overriding Royalty Interest Owners							
		[B]	Offset Operators, Leaseholders or Surface Owner							
		[C]	☐ Application is One Which Requires Published Legal Notice							
		[D]	Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office							
		[E]	For all of the above, Proof of Notification or Publication is Attached, and/or,							
		[F]	☐ Waivers are Attached							
[3]	INFO	RMAT	TON / DATA SUBMITTED IS COMPLETE - Statement of Understanding							
I here	by certif	v that I	or personnel under my supervision, have read and complied with all applicable R							

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.

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

Elizabeth A. CASBEER
Print or Type Name

Elizabet al Castrer Signature

REGULATORY/Compliance Harry

3/10/98 Date

District I PO Box 1980, Hobbs, NM 88241-1980 District II 811 S. 1st Street, Artesia, NM 88210-2834 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV

2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

Form C-101 Revised October 18, 1994 Instructions on back Submit to Appropriate District Office State Lease - 6 Copies Fee Lease - 5 Copies

AMENDED REPORT

									AMEN	(DED REPORT	
APPLIC	CATION	FOR PI	ERMIT T	O DRI	LL, RE-EN	TER, D	EEPEN,	PLUGBACK		O A ZONE RID Number	
		1 Ope	rator name an	d Address					1 200	KID Number	
ARCO PERMIA									· · · · · · · · · · · · · · · · · · ·	000990	
P.O.BOX 161									3 A	PI Number	
MIDLAND, TX									30-0	5 Wall No	
4 Pro	perty Code					Property Na			'	⁶ Well No. ✓	
						IGTON "33	STATE				
		T	T	T	⁷ Surface I				m . 877 . 11		
UL or lot no.	Section	Township	Range	Lot. Idn	Feet from t	1	h/South Line	Feet from the	East/West line	County	
A	33	175	28E	<u> </u>	200		NORTH	380	EAST	EDDY	
		•	Proposed	Bottom	Hole Location	on If Diff	erent Fron	1 Surface			
UL or lot no.	Section	Township	Range	Lot. Idn	Feet from t	he Nort	th/South Line	Feet from the	East/West line	County	
	<u> </u>	9 Proposed	Pool 1	<u> </u>				10 Proposed Po	ol 2		
		ARTESIA						-			
<u> </u>	 	WIESTW	<u>(U-U-JA)</u>					······································			
11 Work Type Code		12	Well Type C	Code	13 Cable/Rotary		¹⁴ Lea	¹⁴ Lease Type Code		15 Ground Level Elevation	
	N		0		R			s		3680*	
16 Mu	ltiple		7 Proposed D	epth	18 Formation		19	¹⁹ Contractor		²⁰ Spud Date	
	NO	}	3100		SAN_ANDRES					4/98	
<u> </u>	110		3100	²¹ Propo	osed Casing		ent Program	n	····	4/30	
Hole S	Size	Cas	ing Size		weight/foot		z Depth	Sacks of Cemen	t Es	timated TOC	
			8-5/8		24#	500'		450		CIRC TO SURF	
12-1/4 7-7/8		1 *	5-1/2		15.5#		00	1200	1	CIRC TO SURF	
/-//8		ļ,	<u>J=1/£</u>		13-3#					J. 10 JOHN .	
					-						
22 Describe the Describe the blow	proposed pro wout prevent	gram. If this ion program,	application is if any. Use a	to DEEPE? dditional sh	N or PLUG BAC eets if necessary	K give the da	ata on the prese	ent productive zone	and proposed ne	w productive zone.	
DRILL 7-7 USING PRE 5-1/2 CA	7/8" HOLE -HYDRATE SING. C	TO 2000; D FW GEL OMPLETE /	W/SATURA SWEEPS, F ND TEST S	TED BRII L +/- 19 SAN ANDRI	SCC. LOG W ES FORMATIO	3100' TD ELL, RUN	W/ SACT G	EL			
SUBJECT W 3000 PSI	ELL PLAN BOPE WIL	NED AS A L BE USEI	3100' STR) FORM 500	AIGHT H	OLE.						
²³ I hereby certif of my knowledge	e and belief.	•					OIL C	ONSERVATION	ON DIVISIO	N	
of my knowledge and belief. Signature: Lizalure A. Casher						Approved by:					
Printed name:	U	A. CASB	-			Title:					
	3/10/98					Approval Date: Expiration Date:					

DISTRICT I'-P.O. Box 1980, Hobbs, NM 88241-1980

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

DISTRICT II P.O. Drawer DD, Artesia, NM 86211-0719

DISTRICT III 1000 Rio Brazos Rd., Aztec. NM 87410

DISTRICT IV P.O. BOX 2088, SANTA PE, N.M. 87504-2088

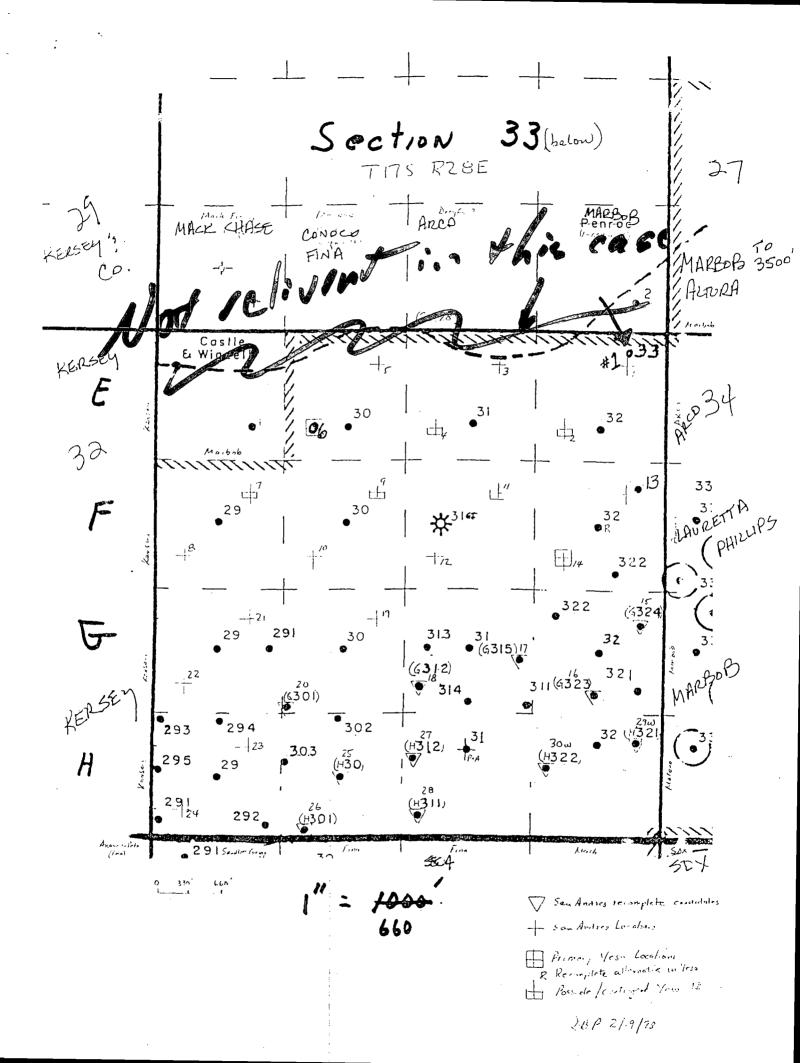
OIL CONSERVATION DIVISION

P.O. Box 2088

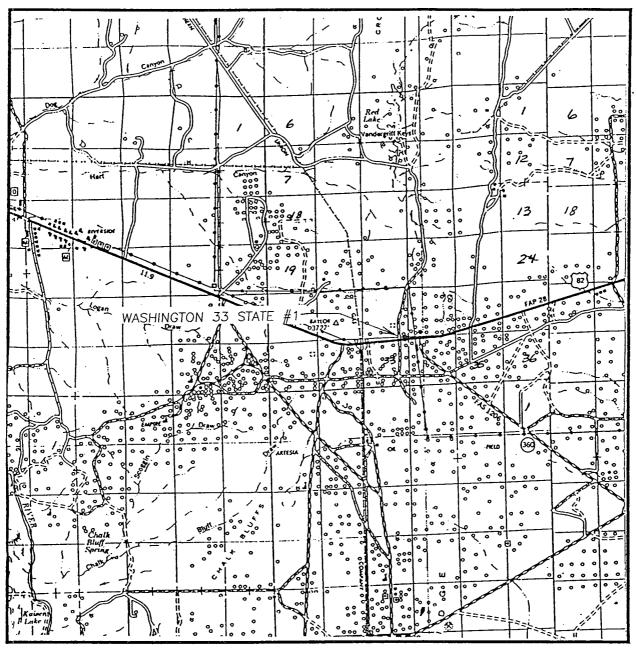
Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

API Number			WELL LOCATION AND Pool Code			. /	Pool Name		, , , , , , , , , , , , , , , , , , , 		
					H	RTESIA C	Q-G-SA)				
Property	Code			WA	Property Na SHINGTON 3	me	J	Well Num	ber		
OGRID N		<u> </u>									
00099			0perator Name ARCO PERMIAN								
00017	<u></u>				Surface Loc			3680	<i></i>		
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
	33	17 S	28 E	Loc Ida	200	NORTH	380	EAST	EDD'		
A		1/3		<u> </u>	J	1	<u></u>	EASI	EDD		
UL or lot No.	Section	Township	Bottom Range	Hole Lo	Feet from the	erent From Su	face Feet from the	East/West line	County		
or at loc no.	Section	Township	Range	Loc Ida	reet nom the	Northy South Time	reet from the	Easty west fifte	county		
Dedicated Acre	s Joint o	or Infill Co	onsolidation	Code 0:	rder No.		1		L		
40											
	OWABLE V	VILL BE A	SSIGNED	TO THIS	COMPLETION	UNTIL ALL INTE	RESTS HAVE B	EEN CONSOLIDA	ATED		
····				DARD UI	VIT HAS BEEN	APPROVED BY	THE DIVISION				
	-	······································				38	OPERATO	OR CERTIFICAT			
					ļ						
					1	-,0	78.1	y certify the the in n is true and compl			
				İ		200,	7 ft l	wledge and belief.			
	-						1		_		
	[]	ob	ī					1//			
		0					Lelin	but ly Ch	stle		
- Section 1							Signature	Λ Λ.	. ^		
i			•			•	EUZAR		CEEK		
						13	Printed Nam	^			
				1				COMP. ANAL	457		
	ì				1		Title 3-16	-99	•		
							3-10-98 Date SURVEYOR CERTIFICATION				
		4									
							SORVER	OR CERTIFICAT	.1010		
							12.1	y that the well locat as plotted from field			
	ł						12.1	made by me or			
	ļ				-		13 1 -	nd that the same is ne best of my belie			
					1		FERR	UARY 25, 1998	8		
	1						Date Survey	UARY 25, 1998	CDG		
							Signature	SealEor			
	•				•		Professional	Surveyor			
	. 1				1		AC SON				
	i						18 onn Fil	2009 Win = 3	-03-98		
	İ						THE IS	8-11-034	00 0		
				ļ	1						
					ļ		6.00	To BONN SON BOOK	M 3030		
							Certafficate I	O. RONALDON PIDSO	ON 3239 12641		



VICINITY MAP



SCALE: 1'' = 2 MILES

SEC. 33 TWP. 17-S RGE. 28-E

SURVEY N.M.P.M.

COUNTY EDDY

DESCRIPTION 200' FNL & 380' FEL

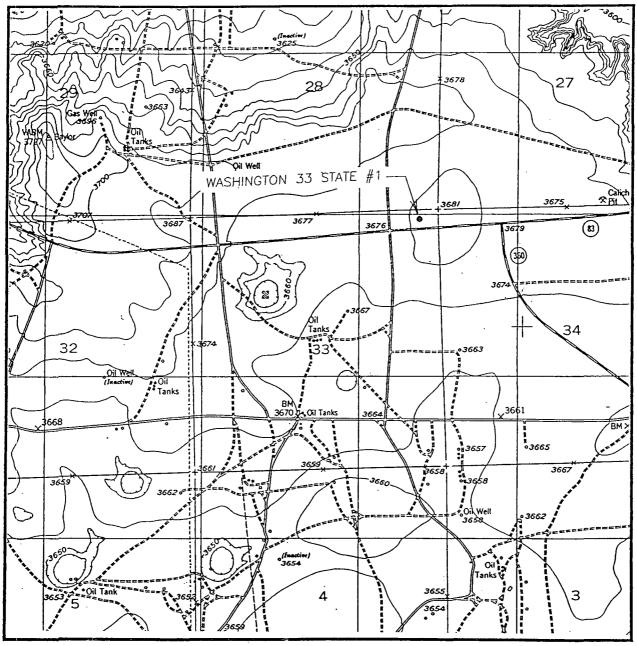
ELEVATION 3680'

OPERATOR ARCO PERMIAN

LEASE WASHINGTON 33 STATE

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117

LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

CONTOUR INTERVAL - 10'

SEC. 33 TWP. 17-S RGE. 28-E

SURVEY N.M.P.M.

COUNTY EDDY

DESCRIPTION 200' FNL & 380' FEL

ELEVATION 3680'

OPERATOR ARCO PERMIAN

LEASE WASHINGTON 33 STATE

U.S.G.S. TOPOGRAPHIC MAP

RED LAKE, NM

JOHN WEST ENGINEERING HOBBS, NEW MEXICO (505) 393-3117





Elizabeth A. Casbeer Regulatory/Compliance Analyst

March 10, 1998

CERTIFIED RETURN RECEIPT MAIL

Marbob Energy Corporation P. O. Box 227 Artesia, New Mexico 88211

Ladies and Gentlemen:

This letter will serve as notice that ARCO Permian has requested administrative approval from the NMOCD for an unorthodox location for Washington "33" State #1 under Rule 104.F. (3), due to topographical conditions. U. S. Highway 82 and powerlines has caused us to drill this well 200'FNL and 380'FEL of Section 33. The final permitted location falls a minimum 115' north of the Highway fence line, and 100' west of an electric powerline.

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may approve the unorthodox location if no objection to the unorthodox location has been made within 20 days after the application has been received.

Sincerely,

Lizalut L. Cushes Elizabeth A. Casbeer

Regulatory/Compliance Analyst

EAC:lc



Elizabeth A. Casbeer Regulatory/Compliance Analyst

March 10, 1998

CERTIFIED RETURN RECEIPT MAIL

Lauretta Phillips Estate Leahy & Sheldon Trust P. O. Box 539 Los Olivos, CA 93441

Ladies and Gentlemen:

This letter will serve as notice that ARCO Permian has requested administrative approval from the NMOCD for an unorthodox location for Washington "33" State #1 under Rule 104.F. (3), due to topographical conditions. U. S. Highway 82 and powerlines has caused us to drill this well 200'FNL and 380'FEL of Section 33. The final permitted location falls a minimum 115' north of the Highway fence line, and 100' west of an electric powerline.

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may approve the unorthodox location if no objection to the unorthodox location has been made within 20 days after the application has been received.

Sincerely,

Elizabeth A. Casbeer

Regulatory/Compliance Analyst

alud a. Cashen

EAC:lc



Elizabeth A. Casbeer Regulatory/Compliance Analyst

March 10, 1998

CERTIFIED RETURN RECEIPT MAIL

Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210

Ladies and Gentlemen:

This letter will serve as notice that ARCO Permian has requested administrative approval from the NMOCD for an unorthodox location for Washington "33" State #1 under Rule 104.F. (3), due to topographical conditions. U. S. Highway 82 and powerlines has caused us to drill this well 200'FNL and 380'FEL of Section 33. The final permitted location falls a minimum 115' north of the Highway fence line, and 100' west of an electric powerline.

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may approve the unorthodox location if no objection to the unorthodox location has been made within 20 days after the application has been received.

Sincerely.

Elizabeth A. Casbeer

Regulatory/Compliance Analyst

EAC:lc



Elizabeth A. Casbeer Regulatory/Compliance Analyst

March 10, 1998

CERTIFIED RETURN RECEIPT MAIL

Louis Dreyfus Gas Holdings 14000 Quail Springs Parkway, Suite 600 Oklahoma City, OK 73134

Ladies and Gentlemen:

This letter will serve as notice that ARCO Permian has requested administrative approval from the NMOCD for an unorthodox location for Washington "33" State #1 under Rule 104.F. (3), due to topographical conditions. U. S. Highway 82 and powerlines has caused us to drill this well 200'FNL and 380'FEL of Section 33. The final permitted location falls a minimum 115' north of the Highway fence line, and 100' west of an electric powerline.

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may approve the unorthodox location if no objection to the unorthodox location has been made within 20 days after the application has been received.

Sincerely,

Elizabeth A. Casbeer

Regulatory/Compliance Analyst

seed h. Casher

EAC:lc



Elizabeth A. Casbeer Regulatory/Compliance Analyst

March 10, 1998

CERTIFIED RETURN RECEIPT MAIL

Marathon Oil Company P. O. Box 552 Midland, Texas 79702

Ladies and Gentlemen:

This letter will serve as notice that ARCO Permian has requested administrative approval from the NMOCD for an unorthodox location for Washington "33" State #1 under Rule 104.F. (3), due to topographical conditions. U. S. Highway 82 and powerlines has caused us to drill this well 200'FNL and 380'FEL of Section 33. The final permitted location falls a minimum 115' north of the Highway fence line, and 100' west of an electric powerline.

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may approve the unorthodox location if no objection to the unorthodox location has been made within 20 days after the application has been received.

Sincerely,

Elizabeth A. Casbeer

Regulatory/Compliance Analyst

zuled G. Carben

EAC:lc



APR _ 8 1998

OIL CONSERVATION DIVISION

energy corporation

March 26, 1998

New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

RE: Unorthodox Well Application Washington "33" State #1 200' FNL and 380' FEL Section 33-17S-28E, N.M.P.M. Eddy County, New Mexico

Gentlemen:

In regards to the Application described above, which has been sumitted by Arco Permian, we do not object to the unorthodox location as long as the actual total depth does not exceed the depth shown in the Application.

If you have any questions regarding this, please contact me.

Sincerely,

Raye Miller

Land Department

Raye : Miller

RM/mm

cc: Ms. Elizabeth A. Casbeer

Arco Permian P. O. Box 1610

Midland, Texas 79702-1610

Facsimile Cover Sheet

To: Michael Stogner

Company: NMOCD, Santa Fe

Phone: 505-827-8185 Fax: 505-827-1389

From: Dave Pearcy

Company: ARCO Permian

Phone: 915-688-5355

Fax: 915-688-5246

Date: 4/16/98

Pages including this 5

cover page:

Re: Washington 33 wells

Attached is the additional documentation you requested for #1. The Geologic and Engineering discussion identifies our problems with US Highway 82, and the need for 2 wellspots in Unit A. Our #2 location, 990 FNL and FEL, has already been approved in Artesia.

The engineer's sketchplat shows how the orthodox spot we wanted for #1 fell on the highway ROW, and how we moved the minimum distance north to fit in the rig. Doug Stewart at the Highway Dept in Roswell said we should not disturb the fenceline.

A map of the gross San Andres Dolomite Pay and a type log are also provided for further clarification of our main objective. We expect to add "Sand" pays in the Queen-Grayburg interval after 1-2 yrs.

Thank you for notification of approval on our #12. Please advise if this will suffice for admin approval on #1.

Thank you, Dave

Geologic and Engineering Discussion for Washington 33 State #1 and 3 Units A, and B of Section 33, T17s, R 28E, Eddy Co, NM

ARCO Permian requests administrative approval for unorthodox locations for Washington 33 State # 1 and #3 in the Artesia (Q-G-SA) Field.

As shown on the engineer's sketch plat, ARCO attempted to obtain an orthodox location for each well at 330' FNL, but was prevented access by the US Highway 82 right-of-way. We have shifted the location north the minimum distance to give us a 100-115' setback required for the small United rig we will use. The attached topo map further verifies the position of the highway, and shows how we have "crowded" the north side of the highway as much as possible to minimize unorthodoxy.

ARCO will require 2 strategically-spaced wellspots in each 40-acre tract to recover reserves in the Artesia pool. One San Andres test has already been permitted in the SW corner of Drilling Units A and B, but we need a location in the NE corner of each unit to fully exploit these pays. Any well on the south side of US Highway 82 would be too close to our other locations to effectively recover updip oil, and would leave undrained a significant portion of our reserves. Directional drilling of these low producing-rate wells cannot be economically justified, since this would add approximately \$100,000 to our cost for only 50 MBO reserves.

At a future date, we anticipate a waterflood could be initiated to effectively sweep both dolomite and sand reservoirs. Optimum results can only be achieved with good spacing of the primary wells. Core results show the Queen-Grayburg-San Andres "sand" pays should yield 130 MBO per 40 acres, but the modest 35 MBO recovered from "sand" wells on and surrounding our lease indicates that 10-20 acre drainage for these pays is reasonable.

We have therefore determined that two wells per 40 acres, with 700 ft between wells wherever possible, would effectively drain this reservoir and protect correlative rights. Where inexpensive recompletions are available, 550 ft between wells will avoid wasteful drilling. "Ten-acre" locations in the same half of any 40-acre unit should be avoided until waterflood startup. With current technology, the drainage radius for these San Andres wells is probably 10 acres, so we do not expect to be affecting any offset owner's correlative rights with these unorthodox locations.

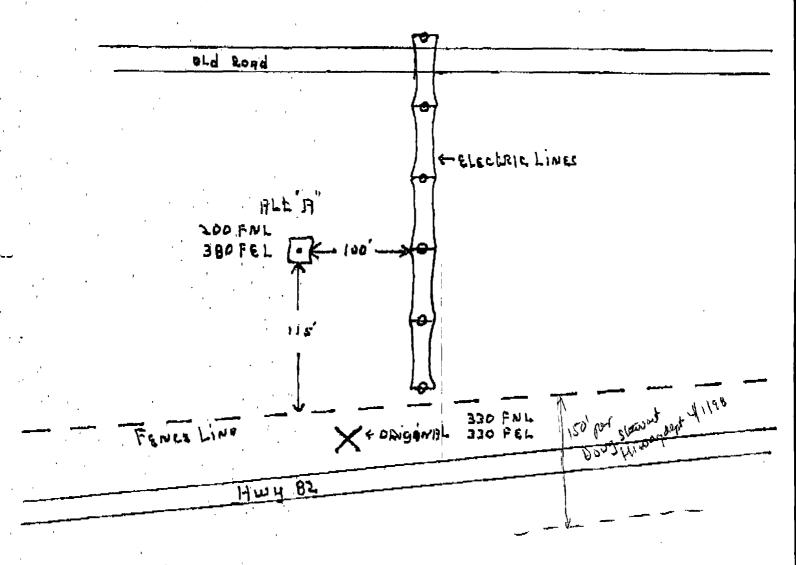
was33nux

ARCO Permian

General Purpose Worksheet

Page No. pt

Pag



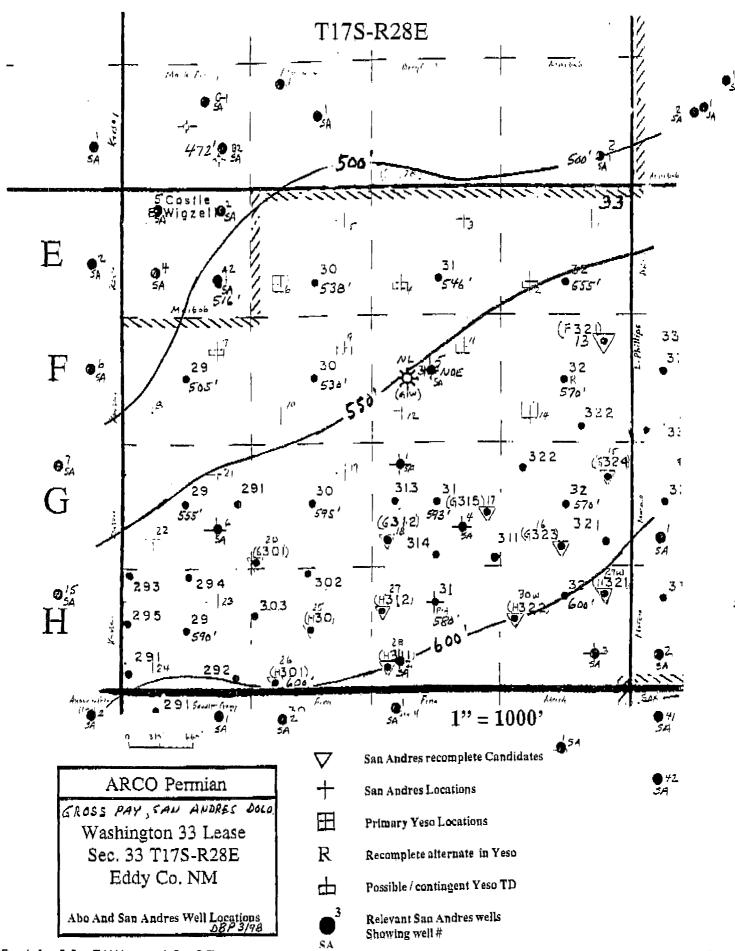
Dauginal Loc. Fell 15' south of Fenez Line : 30' From Huy 82 : 50' West of power Lines. Stalked ALL. A 130' worth : 50' West of Dauginal.

Bring Road in to worth east corner of Loc. ! put Pits on Southwest corner

900-0030-1475/000

APR-16-98 THU

NOT TO SCALE



10:06

915 688 5246