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	4		BOVE THIS LINE FOR DIVISION USE ONLY		······································							
	NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau -											
	ADMINISTRATIVE APPLICATION COVERSHEET											
	THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS											
Applica	(1	[NSP-Non-Standard Pr [DD-Directional I -Downhole Commingling] [C PC-Pool Commingling] [OLS [WFX-Waterflood Expan	sion] [PMX-Pressure N sposal] [IPI-Injection f	eous Dedication)] [PLC-Pool/Lease Com [OLM-Off-Lease Measure faintenance Expansion] Pressure Increase]	ment]							
[1]	TYPE OF A [A]	PPLICATION - Check T Location - Spacing Unit			1998							
	Chec [B]	k One Only for [B] or [C] Commingling - Storage DHC CTB			DN DIVISION							
	[C]	Injection - Disposal - Pr	essure Increase - Enh	anced Oil Recovery								
.]	NOTIFICA [A]	TION REQUIRED TO: -			ot Apply							
	[B]	Coffset Operators, Lea	aseholders or Surface	Owner								
	[C] Application is One Which Requires Published Legal Notice											
	[D] U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office											
	[E]	\Box For all of the above, I	Proof of Notification	or Publication is Attac	hed, and/or,							
	[F]	U Waivers are Attached	i									

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

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.

LAURIE CHERRY

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

urie Cherz	REA	1 Comp	ANALYS	- 4/23	198
e	Title			Date	f



ARCO Permian 600 North Marienfeld Midland TX 79701-4373 Post Office Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

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

Gentlemen:

Under the provisions of NMOCD Rule 104.F.(3), ARCO Permian requests administrative approval for an unorthodox location for its Washington "33" State #3, a new well in the Artesia (Queen-Grayburg-San Andres) Field, due to topography and geological conditions. The location for this proposed well is 260'FNL and 1550'FEL of Section 33, T17S, R28E, Eddy County, New Mexico.

The following exhibits are submitted to support our request for administrative approval:

- 1. A C-102 plat showing the subject 40-acre spacing unit with the unorthodox location.
- 2. A topographic map from John West Engineering.
- 3. A sketch plat showing topographical obstructions around the location.
- 4. A Structure map.
- 5. A gross isopach map of the San Andres porosity interval.
- 6. A type log for the Washington lease.
- 7. A geologic and engineering discussion of the necessity for an unorthodox location.
- 8. A plat showing adjoining and diagonal spacing units.
- 9. A list of affected parties.

On today's date, we sent copies of this APD and a copy of the surveyor's plat to the affected offset operators by certified mail. We advised them if they have an objection, it must be filed in writing within 20 days from the date this notice was sent.

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 igstuch a. Cashen

Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc

cc: NMOCD, Artesia, New Mexico

OFFSET OPERATORS WASHINGTON "33" STATE #3

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

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

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

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

Conoco, Inc. 10 Desta Drive Midland, Texas 79705

Fina Oil & Chemical Company P. O. Box 62102 Houston, Texas 77205



ARCÖ Permian 600 North Marienfeld Midland TX 79701-4373 Post Offica Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

Yates Petroleum Corporation 105 South 4th 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 #3 under Rule 104.F. (3), due to topographical and geological conditions. The location for this proposed well is 260'FNL and 1550'FEL of Section 33, T17S, R 28E, Eddy County, New Mexico.

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,

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Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc



ARCO Permian

600 North Marienfeld Midland TX 79701-4373 Post Office Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

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

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Elizabeth A. Casbeer Regulatory/Compliance Analyst

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Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc



ARCO Permian 600 North Markenfeld Midland TX 79701-4373 Post Office Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

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

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Sincerely,

zuluch le. Cashen

Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc



ARCÓ Permlan 600 North Marienfeld Midland TX 79701-4373 Post Offica Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

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

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white 4. Casher

Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc



ARCO Permian 600 North Marianfeld Midland TX 79701-4373 Post Gilica Box 1610 Midland TX 79702-1610 Telephone 915 688 5570

Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

Conoco, Inc. 10 Desta Drive Midland, Texas 79705

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Elizabeth A. Casbeer Regulatory/Compliance Analyst

April 14, 1998

CERTIFIED RETURN RECEIPT MAIL

Fina Oil & Chemical Company P. O. Box 62102 Houston, Texas 77205

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izstuchte Custer

Elizabeth A. Casbeer Regulatory/Compliance Analyst

EAC:lc

Geological and Engineering Attachment Washington "33" State #3

ARCO Permian requests administrative approval for unorthodox locations for Washington 33 State #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 five 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 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 he 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 reservoirs 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.

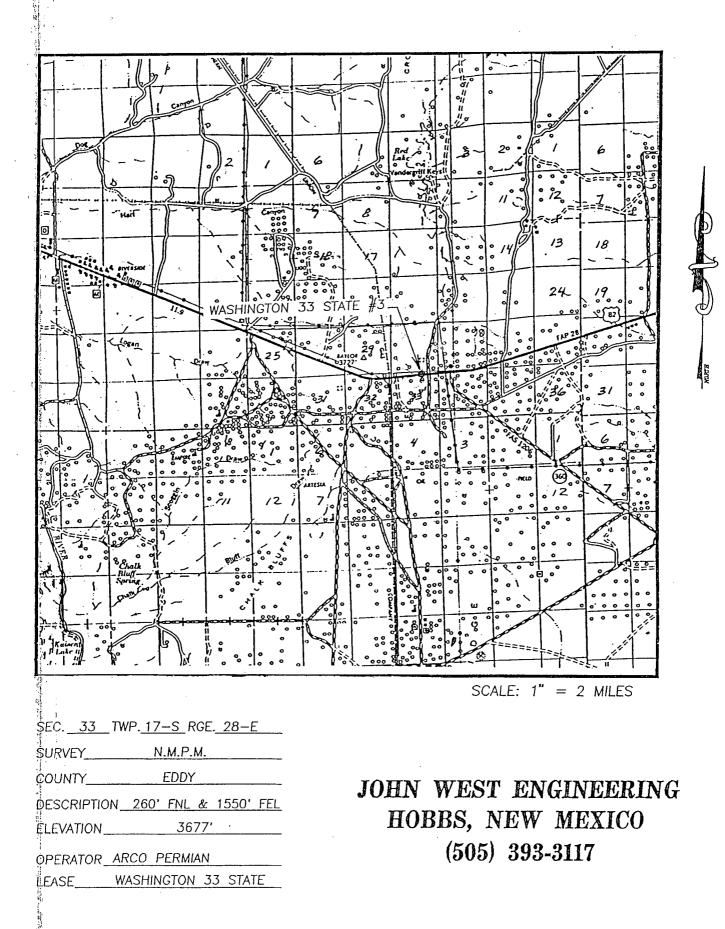
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²³ I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature:						OIL CONSERVATION DIVISION Approved by:					
rinted name:	A. CASBE	FR	ruce	Title:							
		no i N	<u></u>		Approval Date: Expiration Date:						
itle: F	le: REG./COMP. ANALYST										

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DISTRICT I P.O. Box, 1980, Hobbs, NM 88241-1980				State of N Minorals and Natur	Form C-102 Revised February 10, 1994 to Appropriate District Office						
DISTRICT II P.O. Drawer DD, Artesia, NM 88211-	-0719				v		State Lease Fee Lease	- 4 Copies			
DISTRICT III OIL CONSERVATION DIVISION 1000 Rio Brazos Rd., Aztec, NM 87410 P.O. Box 2088											
DISTRICT IV P.O. BOX 2088, SANTA FE, N.M. 875	04-2088		Santa Fe	e, New Mex	tico 87504-208	3	□ AMENDED REPORT				
WELL LOCATION AND ACREAGE DEDICATION PLAT											
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							I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.				
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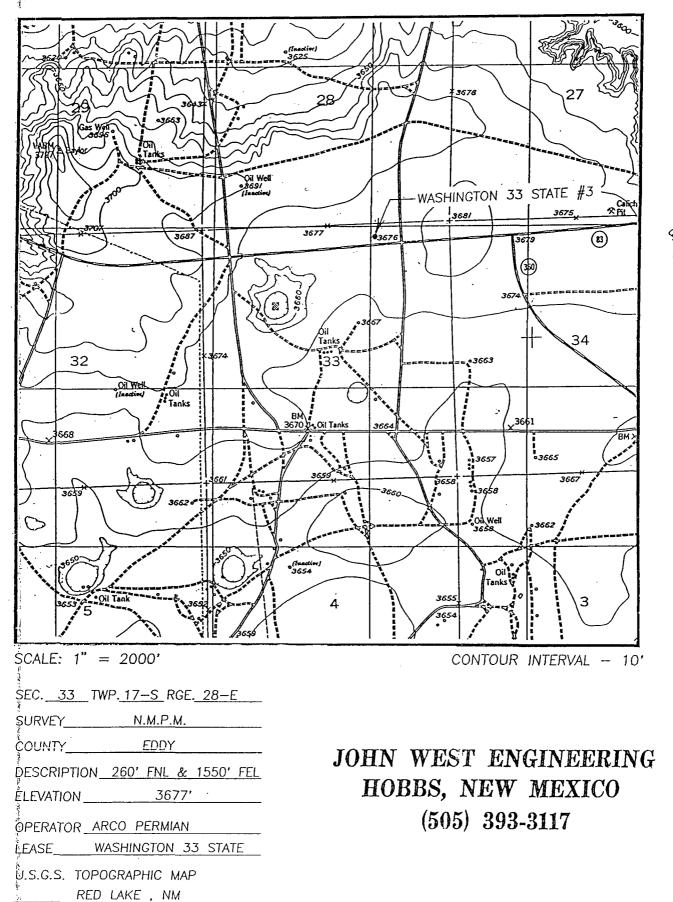
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VICINITY MAP

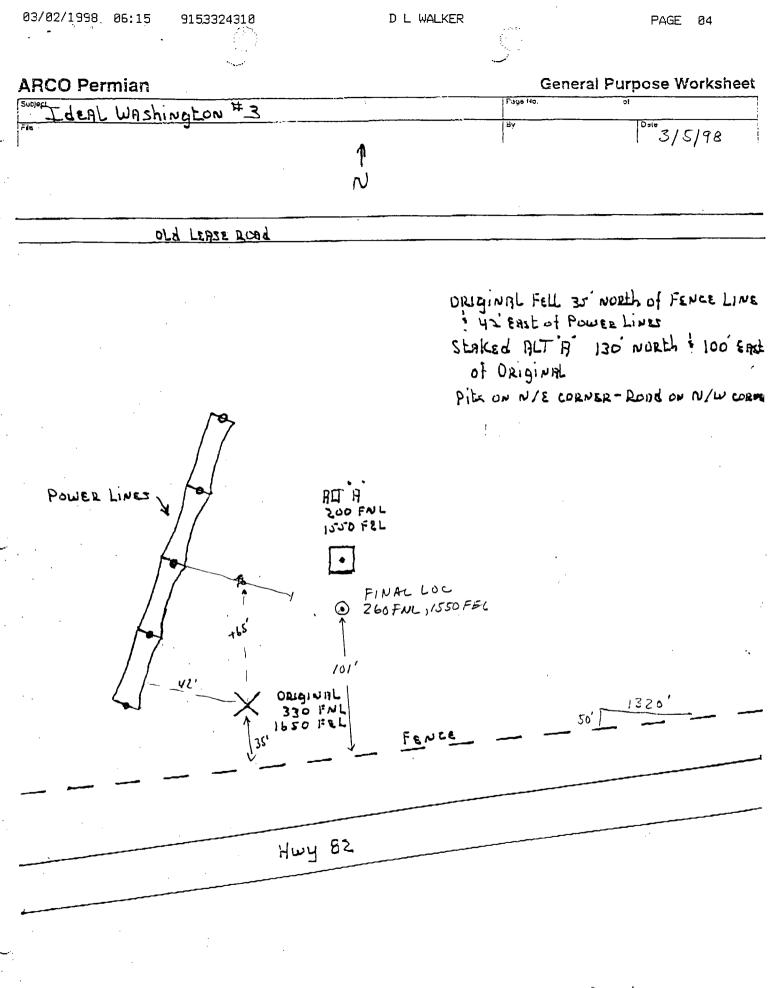


LOCATION VERIFICATION MAP

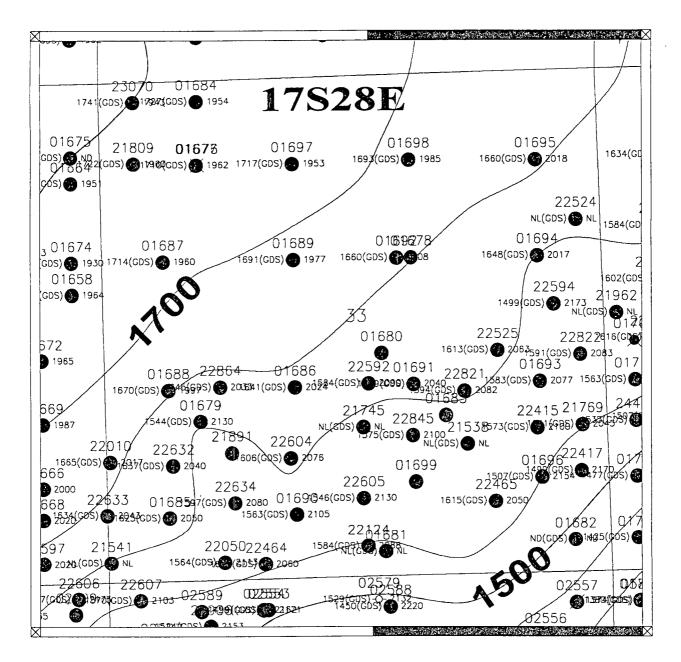
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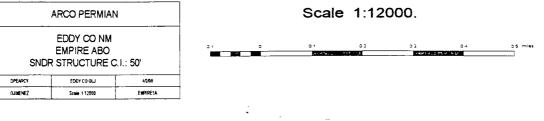


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Not to scale





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