

Mid-Continent Region Exploration/Production

February 10, 1999

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

Re: Application for Non-Standard Location Basin Dakota Pool San Juan 28-7 Unit #190M 2305' FSL & 2335' FEL Unit Ltr. J, Section 27-T28N-R7W Rio Arriba County, New Mexico Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400



Dear Mr. Stogner,

Conoco Inc. plans to drill the above referenced well in 1999. The Basin Dakota pool rules state that this well must be located 790' from the quarter section lines. This well is staked 2305' FSL & 2335' FEL. This location places the well only 335' from the northern quarter section line and 305' from the center section line thereby requiring this application for a non-standard location order. The referenced location is an open, 160 acre Dakota infill site. In an effort to prevent waste and too effectively / efficiently develop and produce the 28-7 Unit to its fullest potential, Conoco selected this location to serve two purposes. The location will serve to accommodate both a primary, 160 acre Dakota infill, and an 80 acre Mesaverde infill withdrawal point (per Order No. R-10987-A, issued out of case No. 12069). Topography, arch, and infrastructure also played a role in limiting our location selection. The ability to access both horizons in a single wellbore will reduce development costs and surface disturbance. Please note that the location is interior to the 28-7 Unit, and does not encroach on any Unit boundaries. An application to downhole commingle (C-107A) Blanco Mesaverde and Basin Dakota will be filed concurrently (per Order No. R-10476-B, issued out of case No. 11815).

Conoco respectfully requests that a non-standard location for the Basin Dakota Pool be issued for the referenced well for the reasons cited above. If there are any questions concerning this application, please feel free to call me at (915) 686-5798.

Sincerely

Kay/Maddox Regulatory Agent

or - Azfec

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NOTES Conoco operates all wells in the 28-7 Unit, NSL is interior to the 28-7 Unit		SAN JUAN 28-7 UNIT RIO ARRIBA CO., NM EPNGNA MIDLAND DIVISION CONOCO 28-7 UNIT		
Map shows only Mesaverde and Dakot wells. A Basin Dakota NSL is requested in order to accommodate both a primary 160 acre Dakota infill and an '80 acre' Mesaverde infill (per order No. R-10987-A out of case 12069).		MESAVERDE & DAKOTA PRODUCERS San Juan 28-7 Unit # 190M Basin Dakota Pool Non-Standard Location <u>STATE API</u> DRAWING 30 \ 039 \ DRAWING 28-7_190 CONOCO INC. OFFICE 10 DESTA DRIVE WEST MIDLAND, TEXAS 79705		

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District 1 PO Box 1980, Hobbs. NM 88241-1980

District II PO Drawer DD, Artesia, NM 88211-0719 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

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

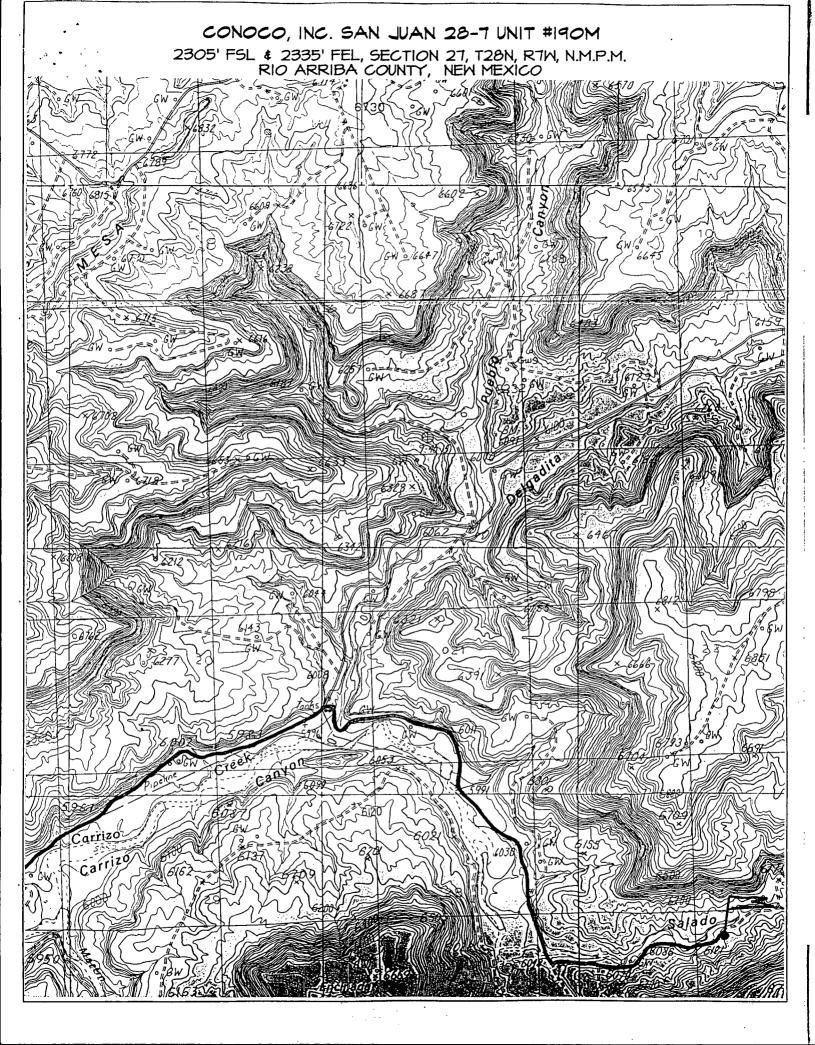
Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT														
A	2 Pool Code 3				Pool Name									
		72319 / 71599 Blanco Mesaverde/Basin Dakota												
4 Property	Code	5 Property Name 6 Well Num												
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Form C-102

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District IV PO Box 2088,	Santa Fe,	NM 87504-	-2088							AMEND	ED REPORT
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February 10, 1999

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San Juan 28-7 Unit Well # 190M

Conoco, Inc. is the sole operator of the 28-7 Unit. This well does not encroach on any outside unit boundary lines therefore there are no offset operators to be notified.

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PF01 HELP PF02 PF07 BKWD PF08 FWI		F04 GoTo PF05 F10 SDIV PF11	PF06 PF12

ONGARD 02/16/99 09:08:03 CMD : INQUIRE WELL COMPLETIONS OG6IWCM OGOMES -TPVF API Well No : 30 39 20590 Eff Date : 03-01-1995 WC Status : A Pool Idn : 71599 BASIN DAKOTA (PRORATED GAS) OGRID Idn : 5073 CONOCO INC Prop Idn : 16608 SAN JUAN 28 7 UNIT Well No : 190 GL Elevation: 99999 U/L Sec Township Range North/South East/West Prop/Act(P/A) B.H. Locn : H 27 28N 07W FTG 999 F S FTG 999 F E P Lot Identifier: Dedicated Acre: 320.00 Lease Type : F Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scrollPF01 HELPPF02PF03 EXITPF04 GoToPF05PF06PF07PF08PF09PF10 NEXT-WCPF11 HISTORYPF12 NXTREC