

DATE IN <u>6-3-10</u>	SUSPENSE	ENGINEER <u>DB.</u>	LOGGED IN <u>6-3-10</u>	TYPE <u>NSL</u>	APP NO <u>PTG-W 1015451721</u>
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



6223
Ch
Munchkin Fed. #19
Eddy, Co.

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-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]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] TYPE OF APPLICATION - Check Those Which Apply for [A]

[A] ☒ Location - Spacing Unit - Simultaneous Dedication
☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] ☐ Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] ☐ Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] ☐ Other: Specify _____

[2] NOTIFICATION 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] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504

Signature

Attorney for Applicant 6/3/10
Title Date

jamesbruc@aol.com
e-mail Address

2010 JUN -3 A 11:45
RECEIVED OCD
R-13262

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)
(505) 660-6612 (Cell)
(505) 982-2151 (Fax)

jamesbruc@aol.com

June 3, 2010

Mark E. Fesmire, P.E.
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule NMAC 19.15.15.13, Chi Operating, Inc. applies for approval of an unorthodox oil well location for the following well:

<u>Well name:</u>	Munchkin Fed. Well No. 19
<u>Surface location:</u>	2300 feet FNL & 400 feet FEL
<u>Bottom hole location:</u>	1300 feet FNL & 1000 feet FEL
<u>Well unit:</u>	NE $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 11, Township 19 South, Range 30 East, N.M.P.M., Eddy County, New Mexico

The well will be drilled to test the Delaware formation (Benson-Delaware Pool). Under the Division's statewide rules, spacing in the Delaware formation is 40 acres, with wells to be at least 330 feet from a quarter-quarter section line.

Please note that this well is in the Benson-Delaware Unit, recently approved by the Division by Order No. R-13262. **Exhibit A**. The well will initially be a producer, and will later be converted to injection.

The E $\frac{1}{2}$ NE $\frac{1}{4}$ of Section 11 is covered by Federal Lease NM 0560353. Interest ownership (royalty overriding royalty, and working interest) in the well unit and in the offsetting acreage is uniform as to the subject depths. **Exhibit B** (this is part of Exhibit B to the Unit Agreement). Therefore, there is no adversely affected offset owner.

Please call me if you have any questions concerning this application.

Very truly yours,


James Bruce

Attorney for Chi Operating, Inc.

IT IS FURTHER ORDERED THAT:

(9) Chi Operating, Inc. (Operator) is hereby authorized to institute secondary recovery operations within the Unit Area initially by the injection of water into the Unitized Formation of the Benson-Delaware Pool, in the interval from 4470 to 5200 feet below the surface, through the following nine wells to be located in Township 19 South, Range 30 East, NMPM, in Eddy County, New Mexico:

<u>Well Name</u>	<u>Surface Location</u>	<u>Bottom Hole Location</u>
Munchkin #22W	900 FNL & 1980 FWL, C-12	930 FNL & 2620 FWL, C-12
Munchkin #21W		1050 FNL & 1150 FWL D-12
Munchkin #20W	1400 FNL & 400 FWL, D-12	1350 FNL & 20 FWL, D-12
Munchkin #19W	2300 FNL & 400 FEL, B-11	1300 FNL & 1000 FEL, A-11
Munchkin #18W		1500 FSL & 2200 FEL, J-1
Munchkin #17W		1700 FSL & 1500 FWL, K-1
Munchkin #16W		300 FSL & 1650 FEL, O-1
Munchkin #15W		300 FSL & 1550FWL, N-1
Munchkin #14W	330 FNL & 500 FWL, D-12	330 FNL & 330 FWL, D-12

(10) No fresh water shall be used as make-up water or otherwise injected pursuant to the injection authorization herein provided.

(11) Operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface from injection, production, or plugged and abandoned wells.

(12) Injection into each of the wells identified above shall be accomplished through 2 7/8 inch plastic lined or fiberglass lined tubing installed in a packer located within 100 feet of the uppermost injection perforations or casing shoe. The casing-tubing annulus shall be filled with an inert fluid, and a gauge or approved leak-detection device shall be attached to the annulus in order to determine leakage in the casing, tubing, or packer.

(13) The injection wells or pressurization system shall be equipped with a pressure control device or acceptable substitute that will limit the surface injection pressure to no more than 860 pounds per square inch.

(14) The Division Director may administratively authorize a pressure limitation in excess of the above upon a showing by the operator that such limitation will not result in the fracturing of the injection formation.

(15) The Division Director may authorize the injection of water into the Unit Area as provided in

EXHIBIT

A

1 injection

2A
 19S-30E
 §1: NE¼SW¼
 §11: E½NE¼
 §12: SW¼NW¼
 160.00 acres
 NM 0560353
 HBP
 12½%
 Crescent Porter
 Hale Foundation
 100%
 Crescent Porter
 Hale Foundation
 15.00%
 Chi Royalty Pool
 1.50%
 Chi Energy, Inc.
 14.50%
 Murchison Oil & Gas, Inc.
 10.00%
 McCombs Energy, Ltd.
 64.92%
 Westbrook Energy, Inc.
 0.50%
 Pocahontas Oil Co., Inc.
 0.50%
 John W. Qualls
 0.50%
 Ken Seligman
 0.50%
 Rio Lobo Resources
 0.75%
 Gary Green
 1.50%
 Brazos Limited Partnership
 5.00%
 Gene Shumate
 1.33%

EXHIBIT 

DATE IN	SUSPENSE	ENGINEER	LOGGED IN	TYPE	APP NO
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

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 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
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[1] TYPE OF APPLICATION - Check Those Which Apply for [A]

[A] ☒ Location - Spacing Unit - Simultaneous Dedication

☐ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] ☐ Commingling - Storage - Measurement

☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] ☐ Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] ☐ Other: Specify _____

[2] NOTIFICATION 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] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

James Bruce
 P.O. Box 1056
 Santa Fe, New Mexico 87504

James Bruce
 Signature

Attorney for Applicant
 Title Date

jamesbruc@aol.com
 e-mail Address

RECEIVED OGD
 2010 JUN - 7 A 10: 01

6/7/10

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)
(505) 660-6612 (Cell)
(505) 982-2151 (Fax)

jamesbruc@aol.com

June 3, 2010

Mark E. Fesmire, P.E.
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Amended application

Dear Mr. Fesmire:

Pursuant to Division Rule NMAC 19.15.15.13, Chi Operating, Inc. applies for approval of an unorthodox oil well location for the following well:

<u>Well name:</u>	Munchkin Fed. Well No. 19
<u>Surface location:</u>	2310 feet FNL & 320 feet FEL
<u>Delaware entry point:</u>	1900 feet FNL & 650 feet FEL (approx. 4170 feet deep)
<u>Bottom hole location:</u>	1300 feet FNL & 1000 feet FEL
<u>Well unit:</u>	E½NE¼ of Section 11, Township 19 South, Range 30 East, N.M.P.M., Eddy County, New Mexico

The well will be drilled to test the Delaware formation (Benson-Delaware Pool). Under the Division's statewide rules, spacing in the Delaware formation is 40 acres, with wells to be at least 330 feet from a quarter-quarter section line. A Form C-102 is attached as **Exhibit A**.

The well is in the potash area, and the BLM severely restricts well locations in that area. Please note that this well is in the Benson Delaware Unit, recently approved by the Division by Order No. R-13262. **Exhibit B**. The well will initially be a producer, and will later be converted to injection. The bottom hole location was selected for its location as an injector.

The E½NE¼ of Section 11 is covered by Federal Lease NM 0560353. Interest ownership (royalty overriding royalty, and working interest) in the well unit and in the offsetting acreage is uniform as to the subject depths. **Exhibit C** (this is part of Exhibit B to the Unit Agreement). Therefore, there is no adversely affected offset owner.

Please call me if you have any questions concerning this application.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James Bruce".

James Bruce

Attorney for Chi Operating, Inc.

DISTRICT I
1626 N. FRENCH DR., HOBBS, NM 88240

State of New Mexico
Energy, Minerals and Natural Resources Department

DISTRICT II
1901 W. GRAND AVENUE, ARTESIA, NM 88210

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

DISTRICT IV
1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe, New Mexico 87505

Form C-102
Revised October 12, 2005
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

WELL LOCATION AND ACREAGE DEDICATION PLAT

☐ AMENDED REPORT

API Number		Pool Code 97083	Pool Name Benson Delaware
Property Code 27108	Property Name MUNCHKIN FEDERAL		Well Number 19
GRID No. 4378	Operator Name CHI OPERATING		Elevation 3426'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
H	11	19-S	30-E		2300' 2310'	NORTH	400' 320'	EAST	EDDY

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
A	11	19-S	30-E		1300	NORTH	1000	EAST	EDDY

Dedicated Acres 40	Joint or Infill	Consolidation Code	Order No.
-----------------------	-----------------	--------------------	-----------

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

<p>GEODETIC COORDINATES NAD 27 NME SURFACE LOCATION Y=609747.2 N X=622605.3 E</p> <p>LAT.=32.675662' N LONG.=103.934877' W</p> <p>BOTTOM HOLE LOCATION Y=610745.9 N X=622002.3 E</p>	<p>DETAIL</p> <p>3416.9' 3434.1' 3425.9' 3451.7'</p>	<p>OPERATOR CERTIFICATION</p> <p>I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>George R. Smith 8/17/09 Signature Date</p> <p>George R. Smith, agent Printed Name</p>
		<p>SURVEYOR CERTIFICATION</p> <p>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 belief.</p> <p>RONALD J. EIDSON Date Surveyed REV. 105/19/09 AR Signature & Seal of Professional Surveyor</p> <p>GARY EIDSON 05/15/09</p> <p>Certificate No. GARY EIDSON 12641 RONALD J. EIDSON 3239</p>

EXHIBIT

A

IT IS FURTHER ORDERED THAT:

(9) Chi Operating, Inc. (Operator) is hereby authorized to institute secondary recovery operations within the Unit Area initially by the injection of water into the Unitized Formation of the Benson-Delaware Pool, in the interval from 4470 to 5200 feet below the surface, through the following nine wells to be located in Township 19 South, Range 30 East, NMPM, in Eddy County, New Mexico:

<u>Well Name</u>	<u>Surface Location</u>	<u>Bottom Hole Location</u>
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Munchkin #21W		1050 FNL & 1150 FWL D-12
Munchkin #20W	1400 FNL & 400 FWL, D-12	1350 FNL & 20 FWL, D-12
Munchkin #19W	2300 FNL & 400 FEL, B-11	1300 FNL & 1000 FEL, A-11
Munchkin #18W	2310 320	1500 FSL & 2200 FEL, J-1
Munchkin #17W		1700 FSL & 1500 FWL, K-1
Munchkin #16W		300 FSL & 1650 FEL, O-1
Munchkin #15W		300 FSL & 1550FWL, N-1
Munchkin #14W	330 FNL & 500 FWL, D-12	330 FNL & 330 FWL, D-12

(10) No fresh water shall be used as make-up water or otherwise injected pursuant to the injection authorization herein provided.

(11) Operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface from injection, production, or plugged and abandoned wells.

(12) Injection into each of the wells identified above shall be accomplished through 2 7/8 inch plastic lined or fiberglass lined tubing installed in a packer located within 100 feet of the uppermost injection perforations or casing shoe. The casing-tubing annulus shall be filled with an inert fluid, and a gauge or approved leak-detection device shall be attached to the annulus in order to determine leakage in the casing, tubing, or packer.

(13) The injection wells or pressurization system shall be equipped with a pressure control device or acceptable substitute that will limit the surface injection pressure to no more than 860 pounds per square inch.

(14) The Division Director may administratively authorize a pressure limitation in excess of the above upon a showing by the operator that such limitation will not result in the fracturing of the injection formation.

(15) The Division Director may authorize additional injection wells within the Unit Area as provided in

EXHIBIT

B

1 injection

2A

19S-30E

§1: NE¼SW¼

§11: E¼NE¼

§12: SW¼NW¼

160.00 acres

NM 0560353

HBP

12½%

Crescent Porter
Hale Foundation
100%

Crescent Porter
Hale Foundation
15.00%

Chi Royalty Pool
1.50%

Brazos Limited Partnership
5.00%

Gene Shumate
1.33%

Chi Energy, Inc.
14.50%

Murchison Oil & Gas, Inc.
10.00%

McCombs Energy, Ltd.
64.92%

Westbrook Energy, Inc.
0.50%

Pocahontas Oil Co., Inc.
0.50%

John W. Qualls
0.50%

Ken Seligman
0.50%

Rio Lobo Resources
0.75%

Gary Green
1.50%

Brazos Limited Partnership
5.00%

Gene Shumate
1.33%

EXHIBIT C

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Monday, June 07, 2010 3:27 PM
To: 'jamesbruc@aol.com'
Subject: Munchkin Fed #19; NSL Application

Dear Jim

I have now received the amended application and the C-102 for this well.

It seems that the encroachment is toward the NW/4 NE/4 and the SW/4 NE/4 of Section 11. The SW/4 NE/4 is part of the unit, but the NE/4 NW/4 is not part of the unit, nor is it included in the lease to which you refer (according to the information sheet attached to your original application). Does your statement that interest ownership is identical refer to the NW/4 NE/4?

Sincerely

David

JAMES BRUCE
Attorney at Law
Post Office Box 1056
Santa Fe, New Mexico 87504
Telephone: (505) 982-2043
Fax: (505) 982-2151
jamesbruc@aol.com

RECEIVED OGD
2010 JUN -8 P 3:05

DELIVER TO: David K. Brooks

COMPANY: Oil Conservation Division

CITY: Santa Fe, New Mexico

FAX NUMBER: (505) 476-3462

PAGES: 4 (including cover sheet)

DATE: 6/8/10

MEMO: David: Notice re: Chl unorthodox location application.

CONFIDENTIALITY NOTICE

This transmission contains information which may be confidential or legally privileged. The information is intended only for the named recipient. If you are not the intended recipient, copying or distribution of the information is prohibited. If you have received this transmission in error, please call us and return the document to us. Thank you.

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)
(505) 660-6612 (Cell)
(505) 982-2151 (Fax)

jamesbruce@aol.com

June 8, 2010

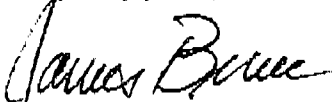
Certified Mail - Return Receipt Requested

To: Persons on Exhibit 1

Ladies and gentlemen:

Chi Operating, Inc. has filed an application with the New Mexico Oil Conservation Division seeking an unorthodox oil well location in the Delaware formation in the E $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 11, Township 19 South, Range 30 East, N.M.P.M., Eddy County, New Mexico. A copy of the application is enclosed. **The well is unorthodox by 10 feet.** You offset the well. If you object to the application, you must notify the Division in writing no later than 20 days from the date of this letter (the Division's address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505). Failure to object will preclude you from contesting this matter at a later date.

Very truly yours,



James Bruce

Attorney for Chi Operating, Inc.

EXHIBIT 1

Great Western Drilling, Ltd.
P.O. Box 1659
Midland, Texas 79702

Jo Ann Ryan
P.O. Box 1503
Midland, Texas 79702

Cimarex Energy Co.
Suite 600
600 North Marienfeld
Midland, Texas 79701

Attention: Mike Wallace

7008 0500 0001 4594 1059

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For delivery information visit our website at www.usps.com	
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To	Climarex Energy Co.
Street, Apt. No., or PO Box No.	Suite 600 600 North Mariensfeld
City, State, ZIP+4	Midland, Texas 79701
PS Form 3800, August 2006 See Reverse for Instructions	

7008 0500 0001 4594 1042

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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To	Jo Ann Ryan
Street, Apt. No., or PO Box No.	P.O. Box 1503
City, State, ZIP+4	Midland, Texas 79702
PS Form 3800, August 2006 See Reverse for Instructions	

7008 0500 0001 4594 1035

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To	Great Western Drilling, Ltd.
Street, Apt. No., or PO Box No.	P.O. Box 14
City, State, ZIP+4	Midland, Texas 79702
PS Form 3800, August 2006 See Reverse for Instructions	

JAMES BRUCE
Attorney at Law
Post Office Box 1056
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Fax: (505) 982-2151
jamesbruc@aol.com

DELIVER TO: David K. Brooks

COMPANY: Oil Conservation Division

CITY: Santa Fe, New Mexico

FAX NUMBER: (505) 476-3462

PAGES: 2 (including cover sheet)

DATE: 6/22/10

MEMO: David: See attached waiver re: Chi Operating unorthodox location filed earlier today. Any expediting you could give to this application is appreciated.

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Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Monday, June 07, 2010 11:55 AM
To: 'jamesbruc@aol.com'
Subject: RE: Chi Operating/Munchkin No. 19 unorthodox location application

Dear Jim,

I have now received the referenced NSL application, but there is not a C-102 attached. Please furnish form C-102.

David

From: jamesbruc@aol.com [mailto:jamesbruc@aol.com]
Sent: Thursday, June 03, 2010 2:07 PM
To: Brooks, David K., EMNRD
Subject: Chi Operating/Munchkin No. 19 unorthodox location application

David: I filed the application this a.m., and realized I'd forgotten to tell you the reason for the location: This acreage is in the potash area, and the BLM severely restricts surface locations.

Jim