



September 1, 2010

HAND-DELIVERED

Mark E. Fesmire, P.E.
Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Application of BOPCO, L.P. for administrative approval of an unorthodox well location for its Poker Lake Unit 293 Well No. 1H/2H to be drilled from a surface location and penetration point 810 feet from the North line and 1980 feet from the East line of Section 21 and a bottomhole location 1650 feet from the North line and 1950 feet from the East line of Section 27 for the first lateral and a bottomhole location 330 feet from the North line and 330 feet from the East line of Section 17 for the second lateral, Township 24 South, Range 30 East, NMPM, Eddy County, New Mexico.

Dear Mr. Fesmire:

BOPCO, L.P. ("BOPCO") hereby seeks administrative approval pursuant to the provisions of Division Rules 19.15.15.13 and 19.15.16.14 for an unorthodox well location for its Poker Lake Unit 293 Well No. 1H/2H. This well will be located in Sections 16, 17, 21, 22 and 27, Township 24 South, Range 30 East, N.M.P.M., Eddy County, New Mexico and is to be drilled in the Delaware formation at a surface location and a penetration point 810 feet from the North line and 1980 feet from the East line of Section 21 and a bottomhole location 1650 feet from the North line and 1950 feet from the East line of Section 27 for the first lateral and a bottomhole location of 330 feet from the North and East lines of Section 17 for the second lateral, Eddy County, New Mexico. A 760-acre project area has been dedicated to this horizontal well comprised of the NW/4 NE/4, S/2 NE/4 and NE/4 SE/4 of Section 21, the NW/4 SW/4 and S/2 SW/4 of Section 22, the NE/4 NW/4 and the W/2 NE/4 of Section 27, the SW/4 SE/4, SE/4 SW/4, N/2 SW/4, S/2 NW/4, NW/4 NW/4 of Section 16 and the NE/4 NE/4 of Section 17.

This location is unorthodox because the Delaware formation under this acreage is governed by the Division's statewide rules which provide for wells on 40-acre spacing

units to be located no closer than 330 feet to the outer boundary of the spacing unit. The proposed well is unorthodox because portions of the Producing Interval, as defined by Division Rule 19.15.16.7, fall outside of the Producing Area dedicated to the well.

Exhibit A is a plat showing the location of the well. The Project Area for the well is entirely within the boundaries of the Poker Lake Unit which is operated by BOPCO. Also, working interest ownership is common in the Project Area and in the areas towards which the well is encroaching/falls outside the Producing Area.

Exhibit B is the C-102 for this well.

Your attention to this application is appreciated.

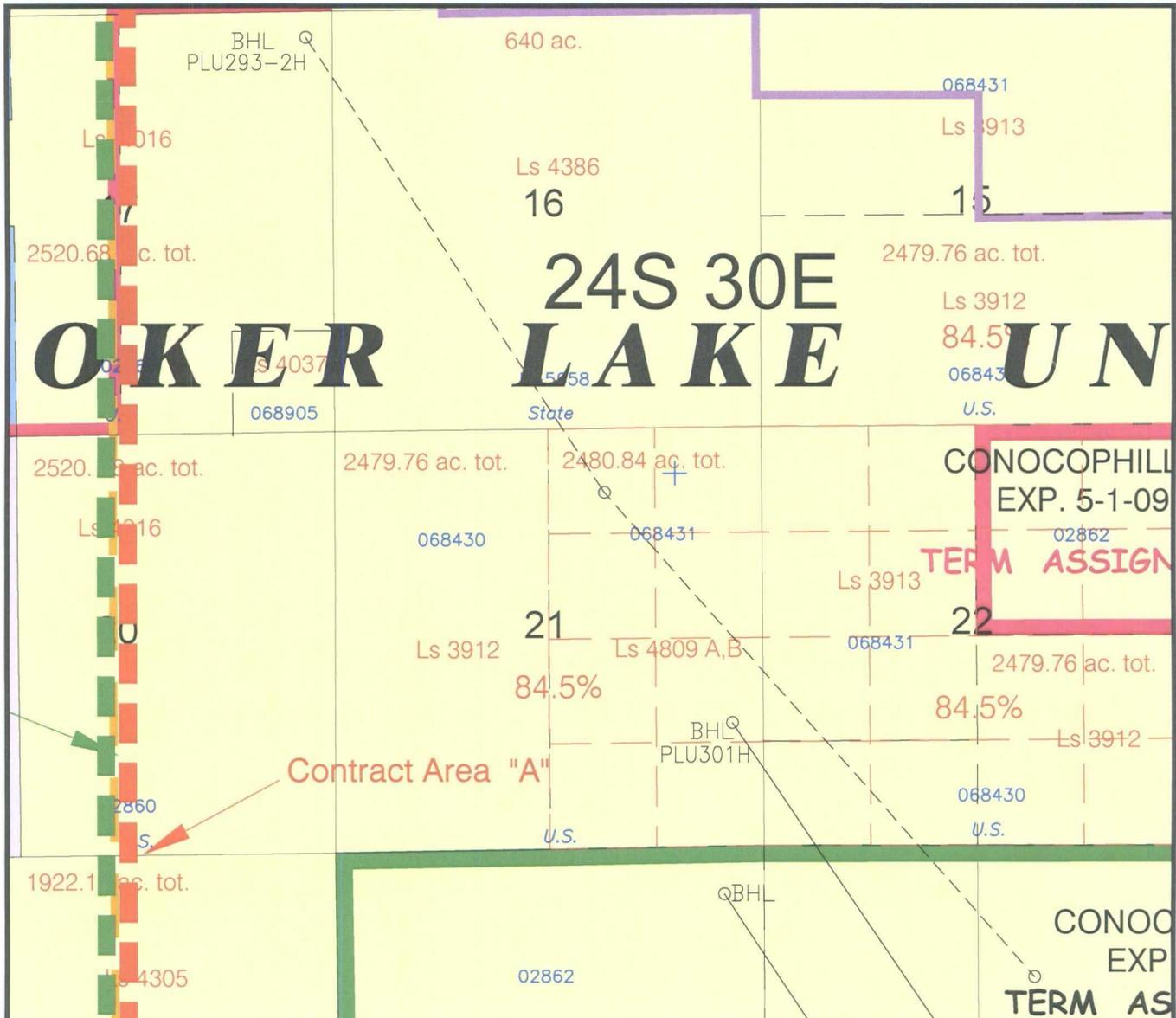
Sincerely,

Ocean Munds-Dry

Ocean Munds-Dry
ATTORNEY FOR BOPCO, L.P.

Enclosures

cc: OCD District Office



BOPCO, L.P.

POKER LAKE UNIT
Eddy County, New Mexico

**Bass/Chesapeake
Exploration Agreement**

DATE: 09-01-10 INTER./DRAFT. BY: AM/EMT FILE: PLU-Rem-Pg41q-3.dwg

EXHIBIT

A

DISTRICT I
1625 N. French Dr., Hobbs, NM 88240

DISTRICT II
1301 W. Grand Avenue, Artesia, NM 88210

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

DISTRICT IV
1220 St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised October 12, 2005

Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number		Pool Code	Pool Name
Property Code	Property Name POKER LAKE UNIT 293		Well Number 1H
OGRID No.	Operator Name BOPCO, L.P.		Elevation 3343'

Surface Location

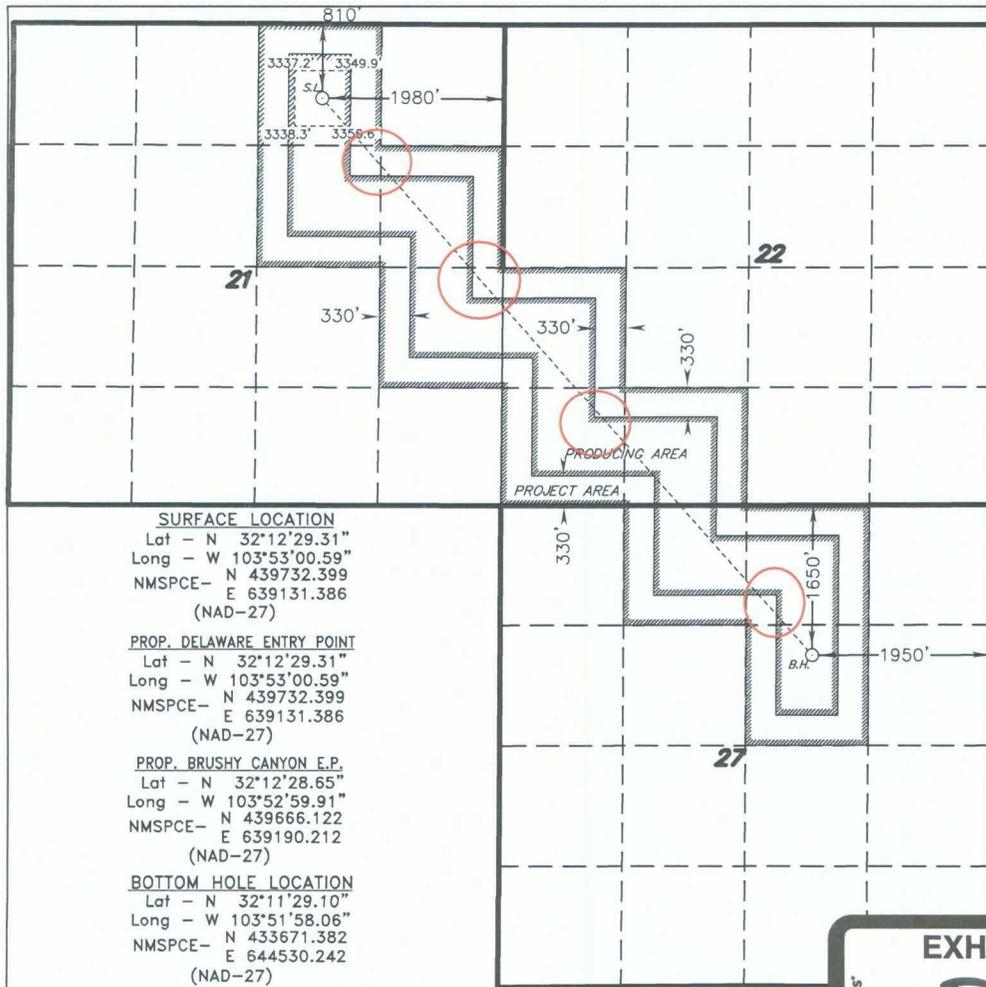
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
B	21	24 S	30 E		810	NORTH	1980	EAST	EDDY

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
G	27	24 S	30 E		1650	NORTH	1950	EAST	EDDY

Dedicated Acres	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



SURFACE LOCATION
Lat - N 32°12'29.31"
Long - W 103°53'00.59"
NMSPC - N 439732.399
E 639131.386
(NAD-27)

PROP. DELAWARE ENTRY POINT
Lat - N 32°12'29.31"
Long - W 103°53'00.59"
NMSPC - N 439732.399
E 639131.386
(NAD-27)

PROP. BRUSHY CANYON E.P.
Lat - N 32°12'28.65"
Long - W 103°52'59.91"
NMSPC - N 439666.122
E 639190.212
(NAD-27)

BOTTOM HOLE LOCATION
Lat - N 32°11'29.10"
Long - W 103°51'58.06"
NMSPC - N 433671.382
E 644530.242
(NAD-27)

OPERATOR CERTIFICATION

I hereby certify that the information contained 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 pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature _____ Date _____

Printed Name _____

SURVEYOR CERTIFICATION

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.

JULY 1, 2009

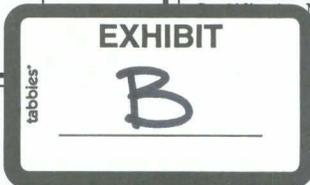
Date Surveyed _____

Signature & Seal of Professional Surveyor

W.C. [Signature]

No. Gary L. Jones 7977

ASIN SURVEYS



Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Tuesday, September 21, 2010 3:56 PM
To: 'Ocean Munds-Dry'
Subject: BOPCO, LP; Poker Lake Unit 293 #1H/2H

Dear Ocean

I have in hand you application for NSL approval for this multilateral, horizontal well. As I read the application, NSL approval is requested for both laterals. However, the C-102 attached depicts only the project area for what you have called the first lateral.

I would appreciate you furnishing also a C-102 showing the projected course of the well and the designated project area for the second lateral also.

Thanks

David