(conoco) NSP 10/4/99

Mid-Continent Region Exploration/Production

September 6, 1999

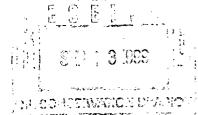
Mr. Michael Stogner New Mexico Oil Conservation Division 2040 Pacheco Santa Fe, New Mexico 87504

RE: Application for Non-standard Proration Unit SEMU Burger #81 API # 30-025-20500 Section 19, T-20-S, R-38-E, P 660' FSL & 660' FEL Eumont Pro Gas Pool (76480) Lea County, NM

Dear Mr. Stogner,

10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

Conoco Inc.



The above listed well was completed in the Eumont pool January 19, 1998. The C-104 was filed December 28, 1998, as was the 3160-4 completion report. The intent to recomplete was approved December 11, 1997. When the intent was filed the C-102 dedicated 160 acres to this well. No request for a non-standard location was ever submitted. At this time Conoce would like to apply for a non-standard proration Unit order. This well was recompleted in the Eumont pool which has a standard proration unit of 640 acres. Conoce would like to dedicate the SE ½ 160 acres, putting the well at a standard location of 660' FSL 660' FEL.

The offset operator plat shows that the only operator that could be affected by this non-standard proration unit request is Amerada Hess. Please find attached evidence that they have been notified.

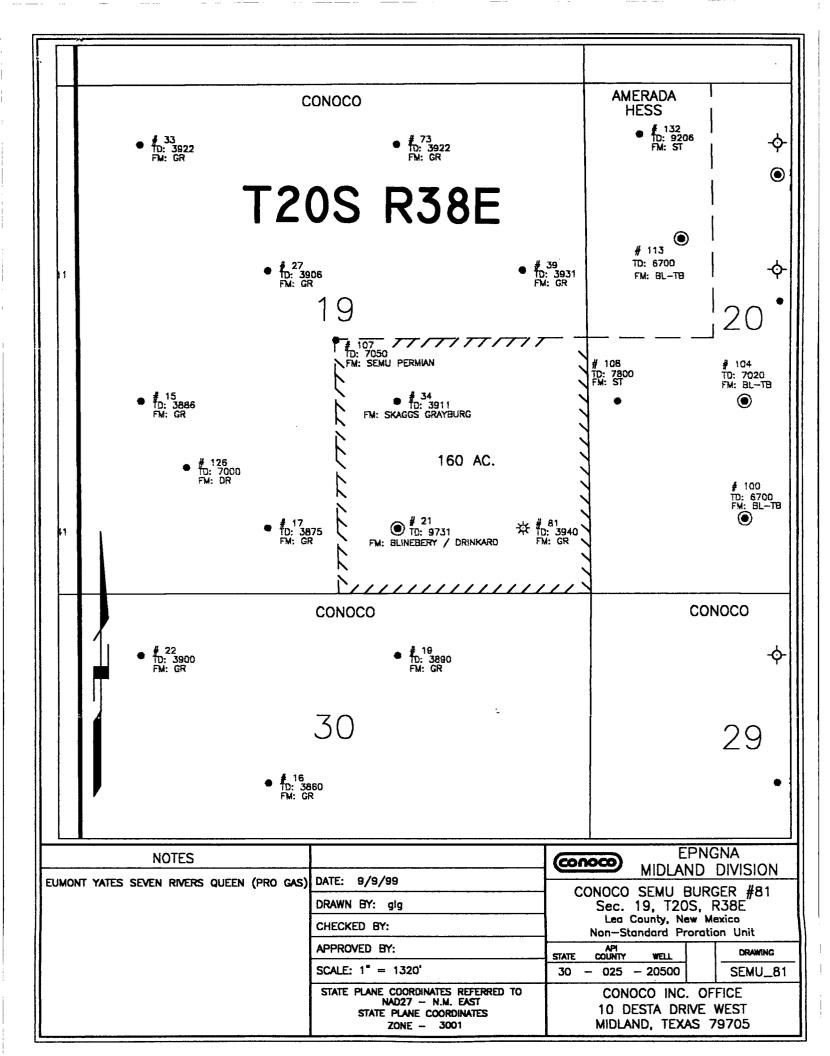
In order to prevent economic waste by allowing access to the Eumont reserves in an existing wellbore, Conoco, Inc. respectfully requests that the application for a non-standard proration unit be granted. Conoco would also like to apologize for not submitting this application before the work was completed. If there are any further questions concerning this application please call me at (915) 686-5798.

Sincerely.

Ka∛ Maddox

Regulatory Agent - Conoco, Inc.

Cc: Oil Conservation Division - Hobbs



PO Box 1986, Hobbs, NM 88241-1986 District II PO Drawer DD, Artesia, NM 88211-9719

District III

State of New Mexico Energy, Minerals & Natural Resources Dep

OIL CONSERVATION DIVISION PO Box 2088

Form C-102 Revised February 10, 1994 instructions on back Submit to Appropriate District Office

State Lease - 4 Copies

1000 Rio Brazos Rd., Astec, NM 87410				Santa Fe, NM 87504-2088							Fee Lease - 3 Copie		
District IV PO Box 2008, Santa Fe, NM 87504-2008										AMENDED REPORT			
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OGRID No.		Conoco, Inc.									31	*Elevation 35	
005073											1	733 GE	
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Notification of Offset Operators:

Amerada Hess PO Box 2040 Houston, TX 77252-2040

P 023 925 254

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	Postage Certified Fee	7252-2040 \$
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PS Form 3800, June 199	1 Joseph A. S. Care	