

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

RECEIVED OCD  
JAN 31 A 7:52

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF FARLEIGH OIL PROPERTIES  
FOR A COMPLIANCE ORDER AGAINST SWEPI LP  
AND SHELL EXPLORATION AND PRODUCTION  
COMPANY, GUADALUPE COUNTY, NEW MEXICO

CASE NO. 14583

BAYSWATER EXPLORATION AND PRODUCTION, L.L.C.'S  
RESPONSE TO  
SWEPI LP AND SHELL EXPLORATIONS & PRODUCTION COMPANYS'  
MOTION TO DISMISS

Bayswater Exploration and Production LLC ("Bayswater") by its attorneys,  
Kellahin & Kellahin, for its response to the motion to dismiss filed by SWEPI LP and  
Shell Exploration & Production Company (collectively "Shell") states:

All the main issues raised in the Motion to Dismiss are resolved when the  
Division answers this question: What should be done with it appears that an operator is  
filing false or misleading forms with the Division? *When*

**THE LOGS**

Professor Carr, writing for Shell, would have you believe that Shell has been  
repeatedly tried to file these logs and blames the OCD for not being able to accept the log  
because of some computer program problems. The Facts are otherwise. A review of the  
OCD website for these four wells demonstrates a knowing and conscious attempt by  
Shell to either avoid filing or delay filing the logs.

## REPRESENTATIVE KEY FACTS

This case involves the well files of four (4) wellbores by Shell, but a review of the Latigo Ranch #2-34 (API No. 30-019-20136) is illustrative of the pattern and facts:

- (1) APD, dated May 9, 2008, and approved by Mr. Martin on May 15, 1008—See Attached as Exhibit "A. The" APD included a statement that Shell would follow a drilling and completion plan with Wireline-Logs including Gamma Ray, Resistivity, Porosity, Neutron and Sonic data Collection, Mudlog, and Flow testing.
- (2) Mr. Martin's letter dated May 15, 2008 to Shell advising Shell that their request for confidentiality only allowed a 90-day period with the filing of the completion report (C-105) Attached as See Exhibit "B"
- (3) The well was spudded on Sep 21, 2008, at total depth on Nov 22, 2008, but not reported until April 8, 2010, See Exhibit "C" attached
- (4) On Sundry Notice dated April 15, 2010, Shell reports production data, but sums result. See Attached Exhibit "D"
- (5) There is a Mud Log dated Jan 31, 2009.
- (6) The well is completed and ready to produce on Sept 17, 2009. See Shell letter dated May 13, 2010, Attached as Exhibit E and the completion report filed 5/13/2010- Attached as Exhibit "F"
- (7) Eight months after completion, Shell files a Completion Report dated May 13, 2010—See Exhibit "F" attached
- (8) There is a Gamma Ray Log filed dated June 30, 2010

## THE PRESSURE-PRODUCTION TESTS

Where are the pressures? Where are the production tests? The Division requires and the Industry expects that they will be found in the completion reports on Division Form C-105. But the C-105 filed on May 13, 2010 by Shell leaves the impression that the true pressures and flow rates were intentionally withheld by taking 4 tests over 4 different time intervals and then summing the totals and then reporting an average press and rate. All this begs the question—Why is Shell doing this?

## **THE PROCESS**

Professor Carr at one time in the distant past worked as Chief Counsel to the OCD Director, Pete Porter. Mr. Porter schooled Professor Carr on many things including the mistaken belief that if the OCD adopted rules and regulations for the oil & gas industry then the companies would police themselves by watching each others operations. Thus, if one company failed to comply, the others in the pool would report to the OCD.

Unfortunately if that was ever correct, it is not so today Companies cannot keep up with their own compliance issue much less polices the other operators for compliance. A non-operating interest owners in the area is worst off. Shell complains that this case was filed of a non-operator (Farleigh) and not the Division. Shell's complaint is an attempt at to direct the Division away from the fact Shell did not file its C-105 for more than eight months after completion of this well. Fortunately Farleigh was watching.

Farleigh's application is simply a request for a hearing so that Farleigh can present evidence that can form the basis for the Division to file an application per Rule 19.15.5.10, see Exhibit "G" attached. and impose sanctions for violation of the Oil & Gas Act. Farleigh believes that it has this proof. It will then be up to the Division to assess civil penalties and corrective action including the suspension of permits or authorization to transport.

## **CONCLUSION**

It is time for the Division to stop Shell from this gamesmanship and to send notice to the operators that they must not be using the OCD APD and Completion forms and procedures including falsely filed Division Form C-105s as a strategy to block other potential operators and mineral interest owners from having timely access to data. Specifically,

- (1) Shell filed on C-103 in order to avoid filing a C-105 (completion report) with logs
- (2) Shell ignores the Instructions within Form C-103 and Form C-105 and the Rules and Regulations of the New Mexico Oil Commission Division.

(3) Shell does not identify the zones tested so it is anybody's guess where the gas came from.

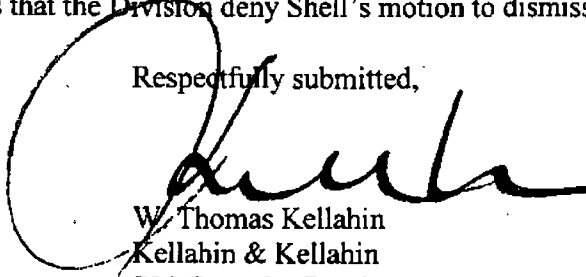
(4) Shell and/or Mr. Bergstrom purposely report data in misleading and confusing formats.

(5) Although Shell states in their APD that they will identify individual zones and commingled zones for testing - they continue to hide the results of their wells by not reporting individual zone tests as required by the Division when wells are multiply completed. Shell acknowledges more than once in the Forms submitted that the well had seven (7) completions.

(6) Shell and the persons responsible for preparing and submitting these false reports to the Division should be held accountable by the Division.

Bayswater requests that the Division deny Shell's motion to dismiss.

Respectfully submitted,

A large, stylized handwritten signature in black ink, likely belonging to W. Thomas Kellahin, is written over the typed name and address.

W. Thomas Kellahin  
Kellahin & Kellahin  
706 Gonzales Road  
Santa Fe, New Mexico 87501

### CERTIFICATE OF SERVICE

I certify that on January 31, 2011 I served a true and correct copy of the foregoing pleading by email to the following:

Terry Warnell, OCD Examiner  
[TerryG.Warnell@state.nm.us](mailto:TerryG.Warnell@state.nm.us)

David K. Brooks, Esq.  
OCD Attorney  
[David.brooks@state.nm.us](mailto:David.brooks@state.nm.us)

Gail Macquesten, Esq.  
OCD Compliance Attorney  
[gail.macquesten@state.nm.us](mailto:gail.macquesten@state.nm.us)

William F. Carr, Esq.  
Attorney for Shell and SWEPI  
[wcarr@hollandhart.com](mailto:wcarr@hollandhart.com)

James Bruce, Esq.  
Attorney for Farleigh Oil Properties  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)



W. Thomas Kellahin

1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1 St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-101  
May 27, 2004

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Submit to appropriate District Office

**CONFIDENTIAL** ☐ AMENDED REPORT

**APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE**

<sup>1</sup> Operator Name and Address SWEPI LP, P.O. Box 576, Houston, Texas 77001		<sup>2</sup> OGRID Number 250036
<sup>4</sup> Local Contact: Shell Exploration & Production Company, 4582 S. Ulster St. Pkwy. Suite 1400, Denver CO 80237		<sup>3</sup> API Number 30-019-20136
<sup>5</sup> Property Code 37165	<sup>6</sup> Property Name Singleton Properties LLC	<sup>7</sup> Well No. Latigo 2-34
<sup>8</sup> Proposed Pool 1		<sup>9</sup> Proposed Pool 2

7 Surface Location									
UL or lot no	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
F	34	10N	23E		1880+/-	North	1946+/-	West	Guadalupe

8 Proposed 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

<b>Additional Well Information</b>				
<sup>11</sup> Work Type Code N	<sup>12</sup> Well Type Code 8 G	<sup>13</sup> Cable/Rotary R	<sup>14</sup> Lease Type Code P	<sup>15</sup> Ground Level Elevation 4716.2 graded
<sup>16</sup> Multiple N	<sup>17</sup> Proposed Depth 12,800 / 13,350	<sup>18</sup> Formation Mississippian	<sup>19</sup> Contractor Nabors Drilling	<sup>20</sup> Spud Date August 1, 2008
Depth to Groundwater ~900 feet (Santa Rosa aquifer)		Distance from nearest fresh water well ~2 miles (CD-1 water well)		Distance from nearest surface water ~2400 feet (unnamed ephemeral drainage)
Pit: Liner Synthetic <input checked="" type="checkbox"/> 20 mils thick Clay <input type="checkbox"/> Pit Volume: 84,430 bbls Drilling Method: Fresh Water 0-1,300', Brine 1,300'-13,500'				
Closed-Loop System <input type="checkbox"/> Fresh Water <input checked="" type="checkbox"/> Brine <input checked="" type="checkbox"/> Diesel/Oil-based <input type="checkbox"/> Gas/Air <input type="checkbox"/>				

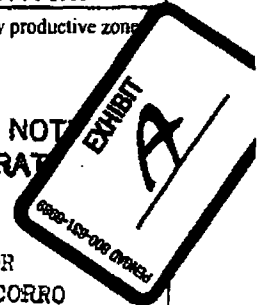
21 Proposed Casing and Cement Program					
Hole Size	Casing Size	Casing weight/foot	Setting Depth	Sacks of Cement	Estimated TOC
30-inch	20-inch	Conductor	90-feet	NA	0 feet
14.75-inch	10.75-inch	40.5 lbs.	1300-feet	930	0 feet
9.875-inch	7.625-inch	29.7 lbs.	6200-feet	1257	1000 feet
6.5-inch	4.5-inch	13.5 & 15.1 lbs.	13350-feet	359	5700 feet

22 Describe the proposed program. If this application is to DEEPEN or PLUG BACK, give the data on the present productive zone and proposed new productive zone. Describe the blowout prevention program, if any. Use additional sheets if necessary.  
See Attachment A - Latigo 2-34 Drilling & Completion Plan

Attachment A3 - Nabors B.O.P. Stack Diagram  
See Attachment B - Latigo 2-34 Surface Use Plan  
See Attached Maps  
Location Photos  
Well Location, Latigo 2-34  
Location Layout for Latigo 2-34  
Topographic Map A  
Topographic Map B

**OIL CONSERVATION COMMISSION TO BE NOTIFIED WITHIN 24 HOURS OF BEGINNING OPERATIONS**

**COLLECT AND SACK SAMPLES FOR NEW MEXICO BUREAU OF MINES, SOCORRO AT AT LEAST TEN FOOT INTERVALS**



<sup>23</sup> I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify that the drilling pit will be constructed according to NMOCD guidelines <input checked="" type="checkbox"/> , a general permit <input type="checkbox"/> , or an (attached) alternative OCD-approved plan <input type="checkbox"/> .		<b>OIL CONSERVATION DIVISION</b>	
Si: <i>Michael L. Bergstrom</i>		Approved by: <i>Ed Martin</i>	
Printed name: Michael L. Bergstrom		Title: <b>DISTRICT SUPERVISOR</b>	
Title: Regulatory Coordinator		Approval Date: 5/15/08	Expiration Date: 5/15/10
E-mail Address: michael.bergstrom@shell.com			
Date: 5/9/2008	Phone: 303.222.6347	Conditions of Approval Attached <input type="checkbox"/>	

## Latigo 2-34 Drilling and Completion Plan

The well will be drilled with potable (TDS<3,000 ppm) water-based fluids from surface to the bottom of the Santa Rosa Formation ("freshwater aquifer"). Surface conductor and intermediate casing strings will be installed and cemented. Below the Santa Rosa Formation, the well will be drilled with nonpotable (TDS>10,000 ppm) water-based fluids to total vertical depth (TVD). Additional intermediate casing strings and production casing will be installed and cemented. Upon completion of drilling, the casing will be perforated in selected prospective zones. Hydraulic fracturing will be performed in the prospective zones, and gas and water flow testing will be conducted in individual and/or commingled zones.

### Drilling Program

- Lithology
  - Tucumcari Basin
    - This area has been the subject of limited oil & gas exploration activity
    - Approximate depths of key geologic formations are shown in Attachment A1
  - Prospective formations are in the Pennsylvanian section
- Fluid Bearing Formations
  - Potable water (Surface – 1500 feet below ground surface)
  - Brackish water (1500+ feet below ground surface)
  - Natural gas/condensate (~8000+ feet below ground surface)
- Drilling Fluids
  - Freshwater drilling fluids (see Attachment A2)
    - Potable (TDS< 3,000 ppm) water-based, 8.3-8.6 ppg, viscosifiers and LCM additives
  - Brackish water drilling fluids (see Attachment A2)
    - Non-potable (TDS>10,000 ppm) water-based fluids, 8.6-10.0 ppg, salt, lime, caustic soda, viscosifiers and LCM additives
  - Lost Circulation Materials (LCM)
    - As needed, LCM consisting of, but not limited to, cedar fibers, mica, drilling paper, graphite, walnut plug, cottonseed hulls and calcium carbonate may be introduced into the well bore to address any lost circulation zones encountered during drilling
- Wellhead Pressure Control (Blowout Prevention [BOP])
  - Wellhead BOP equipment is standard design for "tight gas" wells, as shown on Attachment A3
    - Maximum pressures for equipment (wellhead A section to be 11" 5,000 psi; wellhead B section to be 11" 10,000 psi; BOP with 11" 5,000 psi annular preventer; and Ram preventers with 11" 10,000 psi)
    - Maximum downhole pressures anticipated ~6500 psi.
  - BOP testing procedures conducted by third party contractor upon installation
    - Ram preventers to 10,000 psi and 250 psi; Annular preventer to 2500 psi and 250 psi, for 10 minutes and 5 minutes, respectively

### Casing and Cementing Program

- All casing run and set will be new and unused. Details are included Table 1
- Surface Casing
  - 14.75-inch diameter well bore, drilled to 1300 feet.
  - 10.75-inch diameter casing installed and cemented to surface
- Intermediate Casing
  - 9.875-inch diameter well bore, drilled to 6200 feet.
  - 7.625-inch diameter casing installed and cemented to 1000 feet
- Production Casing
  - 6.5-inch diameter well bore, drilled to 13350 feet.
  - 4.5-inch diameter casing installed and cemented to 5700 feet

### Well Completion

- Casing Perforation
  - Perforate casing in prospective sand zones, using three shots per foot (spf), 120 degree, phased perforating guns
- Hydraulic Fracturing
  - Treat prospective sand zones with ceramic and/or sand proppant materials during hydraulic fracturing


### Logging and Testing

- Lithologic Logging
  - Mudlogging (to TVD); Selective coring (whole and/or rotary sidewall)
- Wireline-Logging, including but not limited to:
  - Gamma Ray, Resistivity, Porosity, Neutron and Sonic data collection
- Flow Testing
  - Flow individual production zones for up to 3 days
  - Flow entire well for up to 120 days

### Water Supply for Drilling and Completions

- One water well (minimum 5 1/2-inch and maximum 7-inch diameter casing) will be drilled on-site about 500 feet east of the well location, on the edge of the well site
  - A temporary appropriation of up to 3 acre feet (AF) of potable water will be obtained from the Office of State Engineer-District 6 (OSE) for production of potable water from the Santa Rosa aquifer
- Potable groundwater will be available from the CD-1 water well located on the Webb Ranch, about 3 miles from the well site
  - A temporary appropriation of up to 3 acre feet (AF) of potable water was previously approved by the Office of State Engineer-District 6 (OSE) for production of potable water from the Santa Rosa aquifer. This appropriation will expire in August 2008, and will be renewed with the OSE.
- Potable groundwater will be available from wells located on the Pajarito Ranch, about 22 miles from the well site
  - Pajarito Creek Ranch holds appropriations for more than 500 acre feet (AF) of potable groundwater, which may be sold for any and all uses.
- Nonpotable produced water will be available from the CD-1 well located on the Webb Ranch, about 3 miles from the well site
  - Produced water from the completion and testing of CD-1 well is currently stored, and may be treated and re-used at other well locations





# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor

Joanna Prukop  
Cabinet Secretary  
Reese Fullerton  
Deputy Cabinet Secretary

Mark Fesmire  
Division Director  
Oil Conservation Division



Mr. Michael L. Bergstrom  
Shell Exploration & Production Co.  
Regulatory Affairs-EP Americas  
4582 S. Ulster Way Parkway  
Suite 1400  
Denver, Colorado 80237

May 15, 2008

Subject: Applications for Permit to Drill (APD)  
Shell Exploration & Production Co., Latigo 2-34 and Latigo 3-5  
Guadalupe County, New Mexico



Dear Mr. Bergstrom:

Enclosed are the approved APD's for the above-captioned wells. Be advised that the New Mexico Oil Conservation Division (NMOCD) will not hold form C-101, form C-102 or form C-144, nor any attachments to these forms, confidential for any period of time. NMOCD rules allow only Well Completion or Recompletion Reports (Form C-105) and logs to be held confidential for a period of 90 days from date of completion of the well. Please see NMOCD Rule 19.15.13.1105.

The application to drill for the Webb 3-23 well has been forwarded to you separately.

Please contact me if you have any questions.

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Ed Martin  
District Supervisor

Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>





## Shell Exploration & Production

State of New Mexico  
Energy, Minerals and Natural Resources Dept.  
Oil Conservation Division-District 4  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Attn.: Ed Martin, District Supervisor

**Shell Exploration & Production Co.**

Regulatory Affairs-EP Americas  
4582 S. Ulster Street Parkway  
Suite 1400  
Denver, Colorado 80237

April 8, 2010



**Subject:** Subsequent Report of Completion  
Shell Exploration & Production Co., Latigo Ranch 2-34 (API No. 30-019-20136)  
Guadalupe County, New Mexico

Dear Mr. Martin:

Shell Exploration & Production Company (Shell), as service provider to SWEPI LP in New Mexico, is submitting our Subsequent Report (Form C-103) to provide completions data for the subject well to New Mexico Oil Conservation Division-District 4 (OCD) for your review and approval. Shell has performed the completions work and flow testing for this well, as specified in the approved APD, and is currently preparing the Well Completion or Recompletion Report and Log (Form C-105). Shell anticipates submitting the Well Completion or Recompletion Report and Log for this well, on or before April 30, 2010.

If you have any questions or require any additional information regarding these reports, please contact me at (303) 222-6347, or David Janney at Kleinfelder in Albuquerque at (505) 344-7373.

Regards,

Michael L. Bergstrom  
Senior Regulatory Advisor  
Shell Exploration & Production Company

Attachments: Form C-103 w/additional details attached

Submit 1 Copies to Appropriate District Office  
District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Ave., Artesia, NM 88210  
District III  
1000 Rio Brazos Rd., Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy, Minerals and Natural Resources

Form C-103  
October 13, 2009

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

WELL API NO. <b>30-019-20136</b>
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No. NA
7. Lease Name or Unit Agreement Name <b>Singleton Properties LLC</b>
8. Well Number <b>Latigo Ranch 2-34</b>
9. OGRID Number <b>250036</b>
10. Pool name or Wildcat <b>Wildcat</b>
11. Elevation (Show whether DR, RKB, RT, GR, etc.) <b>4717+/- graded</b>

SUNDRY NOTICES AND REPORTS ON WELLS  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: Oil Well ☐ Gas Well ☒ Other

2. Name of Operator

**SWEPI LP**

3. Address of Operator

**P.O. Box 576, Houston, TX 77001**

4. Well Location

Unit Letter **F** **1919+/-** feet from the **North** line and **2019+/-** feet from the **West** line  
Section **34** Township **11N** Range **23E** NMPM County **Guadalupe**

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☐ PLUG AND ABANDON ☐  
TEMPORARILY ABANDON ☐ CHANGE PLANS ☐  
PULL OR ALTER CASING ☐ MULTIPLE COMPL ☐  
DOWNHOLE COMMINGLE ☐  
OTHER: ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☐ ALTERING CASING ☐  
COMMENCE DRILLING OPNS. ☐ P AND A ☐  
CASING/CEMENT JOB ☐  
OTHER: PRODUCTION ☒

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Preliminary Production Data (full well flow)

Date of Test	Hours Tested	Choke Size (In.)	Cum'l Oil (bbls)	Cum'l Gas (mcf)	Cum'l Water (bbls)
9/17/09 - 9/19/09	13	48/64	0	0	288
9/21/09 - 9/23/09	43	?	0	0	44
9/25/09 - 10/2/09	100	14/64	0	1360	2570
11/9/09 - 11/9/09	7	?	0	0	370
11/23/09 - 12/12/09	453	14/64 - 22/64	0	4300	2782
<b>SUM</b>	<b>616</b>		<b>0</b>	<b>5660</b>	<b>6054</b>

Average Flow Tbg. P (psi)	Average Csg. P (psi)	Calculated 24hr Oil Rate (bbl)	Calculated 24hr Gas rate (mcf)	Calculated 24hr water rate (bbl)
636	255	0	221	236

Spud Date:

**September 21, 2008**

Rig Release Date:

**February 3, 2009**

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE: Michael L. Bergstrom TITLE: Senior Regulatory Advisor DATE: 04/15/2010

or print name: Michael L. Bergstrom E-mail address: michael.bergstrom@shell.com PHONE: 303-222-6347

For State Use Only

APPROVED BY: A. Martin TITLE: **DISTRICT SUPERVISOR** DATE: 4/19/10  
Conditions of Approval (if any):



## Shell Exploration & Production

State of New Mexico  
Energy, Minerals and Natural Resources Dept.  
Oil Conservation Division-District 4  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Attn.: Ed Martin, District Supervisor

**Shell Exploration & Production Co.**

Regulatory Affairs-EP Americas  
4582 S. Ulster Street Parkway  
Suite 1400  
Denver, Colorado 80237

May 13, 2010



**Subject:** Well Completion Report and Log, and Notice of Intent to Temporarily Abandon  
Shell Exploration & Production Co., Latigo Ranch 2-34 (API No. 30-019-20136)  
Guadalupe County, New Mexico

Dear Mr. Martin:

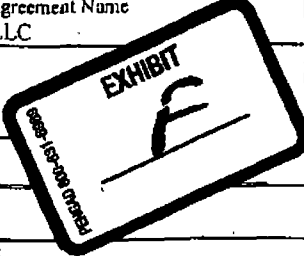
Shell Exploration & Production Company (Shell), as service provider to SWEPI LP in New Mexico, is submitting our Well Completion Report and Log (Form C-105) for the subject well to New Mexico Oil Conservation Division-District 4 (OCD) for your review and recordkeeping. Downhole geophysical logs will be submitted under separate cover. Additionally, Shell is submitting our Notice of Intent (Form C-103) to temporarily abandon the subject well.

If you have any questions or require any additional information regarding these reports, please contact me at (303) 222-6347, or David Janney at Kleinfelder in Albuquerque at (505) 344-7373.

Regards,

Michael L. Bergstrom  
Senior Regulatory Advisor  
Shell Exploration & Production Company

Attachments: Form C-105 w/ mud logs  
Form C-103

Submit To Appropriate District Office Two Copies District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 10 <sup>th</sup> Rio Brazos Rd., Aztec, NM 87410 District IV 1. St. Francis Dr., Santa Fe, NM 87505	<b>State of New Mexico</b> <b>Energy, Minerals and Natural Resources</b>  <b>Oil Conservation Division</b> <b>1220 South St. Francis Dr.</b> <b>Santa Fe, NM 87505</b>	<b>Form C-105</b> <b>July 17, 2008</b>																																									
<b>WELL COMPLETION OR RECOMPLETION REPORT AND LOG</b>																																											
4. Reason for filing:  <input checked="" type="checkbox"/> <b>COMPLETION REPORT</b> (Fill in boxes #1 through #31 for State and Fee wells only)  <input type="checkbox"/> <b>C-144 CLOSURE ATTACHMENT</b> (Fill in boxes #1 through #9, #15 Date Rig Released and #32 and/or #33; attach this and the plat to the C-144 closure report in accordance with 19.15.17.13.K NMAC)		1. WELL API NO. 30-019-20136 2. Type of Lease <input type="checkbox"/> STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/> FED/INDIAN 3. State Oil & Gas Lease No. NA 5. Lease Name or Unit Agreement Name Singleton Properties LLC 6. Well Number: Latigo Ranch 2-34																																									
7. Type of Completion: <input checked="" type="checkbox"/> NEW WELL <input type="checkbox"/> WORKOVER <input type="checkbox"/> DEEPENING <input type="checkbox"/> PLUGBACK <input type="checkbox"/> DIFFERENT RESERVOIR <input type="checkbox"/> OTHER																																											
8. Name of Operator SWEPI LP																																											
9. OGRID 250036																																											
10. Address of Operator P.O. Box 576, Houston, TX 77001																																											
11. Pool name or Wildcat Wildcat																																											
12. Location Surface: F BH:	Unit Ltr F Section 34 Township 11N Range 23E Lot  Feet from the N Line 1919 Feet from the W Line 2019 County Guadalupe																																										
13. Date Spudded 9-22-08	14. Date T.D. Reached 11-22-08	15. Date Rig Released 2-3-09	16. Date Completed (Ready to Produce) 9-17-09																																								
17. Elevations (DF and RKB, RT, GR, etc.) GR		18. Total Measured Depth of Well 13,868'																																									
19. Plug Back Measured Depth 13,460'		20. Was Directional Survey Made? Yes																																									
21. Type Electric and Other Logs Run GR/Neutron		22. Producing Interval(s), of this completion - Top, Bottom, Name T. Penn, B. Penn																																									
<b>23. CASING RECORD (Report all strings set in well)</b>																																											
CASING SIZE	WEIGHT LB / FT.	DEPTH SET	HOLE SIZE																																								
10-3/4"	40.5	0-1,483'	14.75																																								
7-5/8"	29.7	0-6,078'	9.875																																								
4-1/2"	13.5	0-13,854'	6.5																																								
<b>24. LINER RECORD</b>																																											
SIZE	TOP	BOTTOM	SACKS CEMENT																																								
NA																																											
<b>25. TUBING RECORD</b>																																											
SIZE	DEPTH SET	PACKER SET																																									
NA																																											
26. Perforation record (interval, size, and number) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>Intervals</th> <th>Size</th> <th>Number</th> </tr> <tr> <td>11,776'-11,836'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>12,604'-12,706'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>13,006'-13,092'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>13,180'-13,254'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>13,290'-13,372'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>13,402'-13,510'</td> <td>0.28"</td> <td>6/foot</td> </tr> <tr> <td>13,722'-13,790'</td> <td>0.28"</td> <td>6/foot</td> </tr> </table>		Intervals	Size	Number	11,776'-11,836'	0.28"	6/foot	12,604'-12,706'	0.28"	6/foot	13,006'-13,092'	0.28"	6/foot	13,180'-13,254'	0.28"	6/foot	13,290'-13,372'	0.28"	6/foot	13,402'-13,510'	0.28"	6/foot	13,722'-13,790'	0.28"	6/foot	27. ACID, SHOT, FRACTURE, CEMENT, SQUEEZE, ETC. <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>DEPTH INTERVAL</th> <th>AMOUNT AND KIND MATERIAL USED</th> </tr> <tr> <td>11,776'-11,836'</td> <td>205,500#, 20/40 sand</td> </tr> <tr> <td>12,604'-12,706'</td> <td>180,000#, 20/40 sand</td> </tr> <tr> <td>13,006'-13,092'</td> <td>60,000#, 20/40 sand</td> </tr> <tr> <td>13,180'-13,254'</td> <td>54,081#, 20/40 sand</td> </tr> <tr> <td>13,290'-13,372'</td> <td>58,529#, 20/40 sand</td> </tr> <tr> <td>13,402'-13,510'</td> <td>290,853#, Econoprop</td> </tr> <tr> <td>13,722'-13,790'</td> <td>31,672#, Econoprop</td> </tr> </table>		DEPTH INTERVAL	AMOUNT AND KIND MATERIAL USED	11,776'-11,836'	205,500#, 20/40 sand	12,604'-12,706'	180,000#, 20/40 sand	13,006'-13,092'	60,000#, 20/40 sand	13,180'-13,254'	54,081#, 20/40 sand	13,290'-13,372'	58,529#, 20/40 sand	13,402'-13,510'	290,853#, Econoprop	13,722'-13,790'	31,672#, Econoprop
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<b>28. PRODUCTION</b>																																											
Date First Production NA		Production Method (Flowing, gas lift, pumping - Size and type pump) NA																																									
Well Status (Prod. or Shut-in) Shut-in																																											
Date of Test 9/17/09 - 9/19/09 9/21/09 - 9/23/09 9/25/09 - 10/2/09 11/9/09 - 11/9/09 11/23/09 - 12/12/09	Hours Tested 13 43 100 7 453	Choke Size 48/64 ? 14/64 ? 14/64-22/64	Prod'n For Test Period     																																								
Oil - Bbl 0	Gas - MCF 0 0 1360 0 4300 <b>5660 CUM</b>	Water - Bbl. 288 44 2570 370 2782 <b>6054 CUM</b>	Gas - Oil Ratio NA																																								
Flow Tubing Press. Avg. 636	Casing Pressure Avg. 255	Calculated 24-Hour Rate  	Oil - Bbl NA																																								
Gas - MCF 221	Water - Bbl 236	Oil Gravity - API - (Corr.) NA																																									
29. Composition of Gas (Sold, used for fuel, vented, etc.) A) _____			30. Test Witnessed By  																																								
31. List Attachments Mud and geophysics logs on CDs																																											
32. If a temporary pit was used at the well, attach a plat with the location of the temporary pit Temp pit used for completions only, drilling used closed loop system all cuttings removed and transported to Gandy-Marly, Inc. Tatum, NM																																											