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New Mexico Oil Conservation Division
1220 South St. Francis Drive
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Attn: Mr. David Catanach

Re: Case No. 13767
Application of Western Minerals & Oil, Ltd.
for Approval of a Pilot Project for Purposes
of Determining Proper Well Density and
Well Location Requirements in the South
Blanco-Pictured Cliffs Gas Pool, San Juan
County New Mexico

Burlington Resources Oil & Gas Company LP (Burlington) and ConocoPhillips Company (COP) are in receipt of the above referenced application requesting approval for a Pilot Project in the South Blanco-Pictured Cliffs Formation (PC). Burlington and COP will not oppose Western's request to conduct an 80-acre PC pilot infill program in the SW/4 of Section 24 T27N R8W at this time.

However, we believe there is little to be gained from using this well as a pilot for the following reasons:

- The area's 80-acre performance has been established by previous pilot infill wells on the same trend on either side of Western's proposed pilot. The previous pilot wells are the Filan #6 (API No. 30-045-20355) located approximately 5 miles to the northwest and the Luthy A #4 (API No. 30-045-26613) located approximately 3 miles to the south.
- This single well pilot does not improve our understanding of the PC pool on a pool wide scale
- The shut-in status of the parent well for the past year while the infill well has been producing makes any conclusions about interference difficult

We believe the proposed pilot program more closely resembles a simultaneous dedication for the wells involved to allow both wells to continue to produce. Since we don't believe correlative rights are an issue at this time, because of the low production rate of the parent and the expected low EUR of the infill, we would not oppose a simultaneous dedication of the two PC wells.

Should this project move forward as a pilot project, we request the following data be provided by Western to the NMOCD and be made available to other operators:

- Reservoir pressure in the Marron #6 (API No. 30-045-21323) prior to production
- Reservoir pressure in the Marron #1 (API No. 30-045-06310) prior to putting the well back online
- Reservoir pressure in both wells after simultaneous production for at least six months
- Monthly wellhead tubing and casing pressures for the life of both wells

Should you have any question about our concerns in this application, please contact Tom Cochrane at 505-599-4049 or Alan Alexander at 505-326-9757.

Very truly yours

 for Alan Alexander

Alan Alexander
Senior Land Advisor