#### **OIL CONSERVATION DIVISION**

August 16, 1995

Hinkle, Cox, Eaton, Coffield & Hensley P.L.L.C. Attn: James Bruce P. O. Box 2068 Santa Fe, New Mexico 87504-2068

Exxon Corporation
Attn: Alex Correa
P. O. Box 1600
Midland, Texas 79702-1600

**Re:** Case Nos. 11,297 and 11,298, Applications of Exxon Corporation for statutory unitization, to initiate a waterflood project, for "EOR" qualification, and for 18 unorthodox oil well locations, Eddy County, New Mexico.

Administrative request for four unorthodox oil well locations in Sections 31 and 32, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico.

Dear Messrs. Bruce and Correa:

Exxon's application for administrative approval by letter dated July 31, 1995 for four unorthodox oil well locations for the purpose of completing an efficient production/injection pattern within the proposed Avalon Delaware Unit Waterflood Project in Eddy County, New Mexico, which was the subject of controversy in consolidated Cases 11,297 and 11,298 heard in Hobbs, New Mexico on June 29, 1995, is being returned to you at this time.

These four wells were in part the subject of said controversial hearing, an order is still pending in this matter and should be issued shortly. Any action taken by the Division prior to the issuance of a decision in Case Nos. 11,297 and 11,298 on these four wells would be most inappropriate and could be construed as an attempt to circumvent the hearing process and to influence final judgement.

Should there be any need for further questions or comments concerning this matter, Mr. Bruce may address them in a letter with appropriate notice to the other two parties in these proceedings.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: Oil Conservation Division - Artesia

U. S. Bureau of Land Management - Carlsbad

Case File 11,297

Case File 11,298

William J. LeMay - OCD Director, Santa Fe

Rand L. Carroll - Counsel, OCD, Santa Fe

Yates Petroleum Corporation, c/o William F. Carr - Santa Fe

Premier Oil & Gas, Inc., c/o W. Thomas Kellahin - Santa Fe

TOLGONSER TO A GALLOSON RECOVES

'85 891 H AN 8 52

#### EXON COMPANY, U.S.A.

POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

July 27, 1995

MIDLAND PRODUCTION ORGANIZATION

TPERATIONS INTEGRIT!

Proposed Avalon (Delaware) Unit Unorthodox Locations Sections 31 & 32, T20S, R28E Eddy County, New Mexico

Mr. William J. LeMay New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Dear Mr. LeMay:

Exxon Corp. requests Administrative Approval of the Unorthodox Locations listed below in the Proposed Avalon Delaware Unit.

Well#	Location	Qtr./Qtr.	Unit Letter
2420	32-20S-28E	SWSW	L
2220	32-20S-28E	SWNW	· E
2216	31-20S-28E	SWNE	G
2014	31-20S-28E	SENW	F

These wells are necessary "to permit the completion of an efficient production and injection pattern with a secondary recovery or pressure maintenance project" and are not "closer than 330 feet to the outer boundary of the lease or the unitized area, nor closer than 10 feet to any quarter-quarter section line or subdivision inner boundary" (Rule 104,F,1).

Exxon Corp. will operate the Unit and is also the offset operator of the existing lease and has no objections to these unorthodox locations. Copies of the following are attached for each well: C-101, C-102, Federal Form 3160-3 (for Federal wells). Approval of this application will allow the permits to drill to be released before unitization. A space is provided below for your signature. If you have any questions, please call me at (915) 688-6782.

Sincerely,

Alex M. Correa

William J. LeMay
Title:
Date:

AMC:mym Attachments

A 1 MEJON OF EXXON SCRECHATION



Dustrict ( ≃O Box 1980, Hobbs, NM 88241-1980

State of New Mexico

Form C-101 Revised February 10, 1994

Durance II 20 Drawer OD. Artessa. NM \$8211-0719

Instructions on back Submit to Appropriate District Office

Sm. Regulatory Specialist

AMENDED REPORT  APPLICATION FOR PERMIT TO DRILL. RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZON  EXXON Corp. P.O. Box 1600, ML-14 Midland, Texas 79702  Preparaty Cata  Avalon (Delaware) Unit 2420  Surface Location  U. or as as Southan Township Easy Las Las Transfers to Versich Permit to Surface  U. or as as Southan Township Easy Las Las Transfers to Versichers to Fast from the East-Was Law Eddy  Proposed Bottom Hole Location if Different From Surface  U. to as as Southan Township Easy Las Las Transfers to Versichers to Fast from the East-Was Law Eddy  Proposed Bottom Hole Location if Different From Surface  U. to as as Southan Township Easy Las Las Transfers to Versichers to Fast from the East-Was Law Endy  Proposed Bottom Hole Location if Different From Surface  U. to as as as Southan Township Easy Las Las Fast from the North-Humb to Fast from the East-Was Law Endy  N	>O Drawer OD, Ansses, NM \$4211-0 Dustrict ∰ (COO Rio Brison Rd., Azies, NM \$74)		L CONSERVATI PO Box 2 Santa Fe. NM 8	2088	N Subs	Talt to Ap	State	Lease - 6 Copies Lease - 5 Copies
Excon Corp. P.O. Box 1600, ML-14 Midland, Texas 79702  Avalon (Delaware) Unit  Surface Location  UL or us as. Senten Terrando Range Las las Fractron to South 1107 West Eddy  Proposed Bottom Hole Location If Different From Surface  UL or us as. Senten Terrando Range Las las Fractron to North-Bond Range Ra	Duttrict IV PO Box 2088, Senta Fe, NM 87504-20	MI.					AMEN	DED REPORT
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Company   Comp	' Proporty Code	Avalon (		Property Name	·			
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20" 16" Line Pipe 40' 40 cu. ft. Surface  14 3/4" 10 3/4" 40.4#/K-55 600' 350 cu. ft. Surface  9 1/2" 7 5/8" 25.4#/K-55 2.540' 500 cu. ft. Surface  6 3/4" 4 1/2" 4.56* ** 300 cu. ft. Lnr. Top  ** 4 1/2" prod. string is fiberglass.  ** 4 1/2" prod. string from 2,300' to TD.  - C-102 is attached.  - Copy of request for Administrative Approval of Unorthodox Locations is attached  OIL CONSERVATION DIVISION  Approved by:				and Cement P	rogram	· · · · · · · · ·		
14 3/4" 10 3/4" 40.4#/K-55 600' 350 cu. ft. Surface 9 1/2" 7 5/8" 26.4#/K-55 2.540' 500 cu. ft. Surface 6 3/4" 4 1/2" 4.56* ** 300 cu. ft. Lnr. Top  Description (LUG ACK)  * 4 1/2" prod. string is fiberglass. ** 4 1/2" prod. string from 2,300' to TD.  - C-102 is attached Copy of request for Administrative Approval of Unorthodox Locations is attached  OIL CONSERVATION DIVISION  Approval:  OIL CONSERVATION DIVISION		Caring Stars				of Comment		Catherine TOC
9 1/2" 7 5/8" 26.4#/K-55 2,540' 500 cu. ft. Surface 6 3/4" 4 1/2" 4.56* ** 300 cu. ft. Lnr. Top  ** 4 1/2" prod. string is fiberglass. ** 4 1/2" prod. string from 2,300' to TD C-102 is attached Copy of request for Administrative Approval of Unorthodox Locations is attached  **OIL CONSERVATION DIVISION  **Approval:**  OIL CONSERVATION DIVISION	20"			<u> </u>	40 cu.	ft.	S	urface
6 3/4" 4 1/2" 4.56* ** 300 cu. ft. Lnr. Top  ** 4 1/2" prod. string is fiberglass. ** 4 1/2" prod. string from 2,300' to TD.  - C-102 is attached.  - Copy of request for Administrative Approval of Unorthodox Locations is attached  **OIL CONSERVATION DIVISION  **Approve the control of the co	14 3/4"		40.4#/K-55	600'	350 cu	ft.	S	urface
* 4 1/2" prod. string is fiberglass.  ** 4 1/2" prod. string from 2,300' to TD.  - C-102 is attached.  - Copy of request for Administrative Approval of Unorthodox Locations is attached  OIL CONSERVATION DIVISION  Approve by:				2,540'				
* 4 1/2" prod. string is fiberglass.  ** 4 1/2" prod. string from 2,300' to TD.  - C-102 is attached.  - Copy of request for Administrative Approval of Unorthodox Locations is attached  OIL CONSERVATION DIVISION	6 3/4"	4 1/2"	4.56*	**	300 cu.	ft.	Lr	r. Top
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Alex M. Correa Title:	alley M'	rrea		Title:	<u> </u>			

Approval Date:

Externos Dete:

District I PO Box 1980, Hobbs, NM 88241-1980 State of New Mexico
Energy, Minerals & Natural Resources Department

Revised February 10, 1994
Submit to Appropriate District Office
State Lease -4 Copies
Fee Lease - 3 Copies

District II PO Drawer DD, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

1000 Rio Brasos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088

Distance to nearest Town

☐ AMENDED REPORT

Drawing File Name

Ma - MINORNA

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Form C-102

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code 03715	Pool Name AVALON DELAWARE 37		
Property Code	Property Nor AVALON (DELAW		Well Number 2420	
00RD No. 007673	Operator Non Exxon Co		Elevation 3205	

#### Surface Location

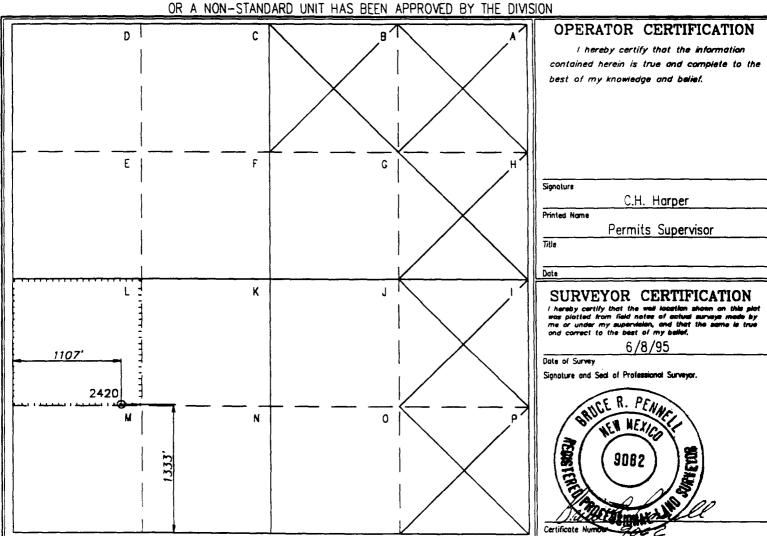
UL or lot no.	Section	Township	Range	Lot ldm	Feet from the	North/South line	Feet from the	East/West line	County
L	32	205	28E		1333'	SOUTH	1107'	WEST	EDDY

#### 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
Dedicated Acres	Joint e	or in fil	Cansolidation Co	de	Order No.	l		<u> </u>	
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNITL ALL INTERESTS HAVE BEEN CONSOLIDATED

OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



Crustres I ≥O Box 1980: Hosse, NM \$8241-1980

State of New Mexico

Form C-101 Revised February 10, 1994 INSTRUCTIONS OR DECK

Duarret (I 20 Dissell DD. Artens. NM \$8211-0719

Experience Date:

am Sp. Requiatory Specialist

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6 3/4"	4 1/2"	4.56*	**		300 cu.		Ln	ır. Top
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alex M.	Correa		Title:					

Approva Date:

District | PO Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals & Natural Resources Department

District II PO Drawer DD, Artesia, NM 88211~0719

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

District IV PO Box 2088, Santa Fe, NM 87504-2088 OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
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Fee Lease - 3 Copies

☐ AMENDED REPORT

WEII	LOCATION	AND	ACDEACE	DEDICATION	DIAT
WELL	LUCATION	AND	ACREAGE	DEDICATION	PLAI

API Number	Pool Code 03715	Pool Name AVALON DELAWARE 3715		
Property Code	Property Name AVALON (DELAWA			
0GRID No. 007673	Operator Name Exxon Corp	. Elevation		

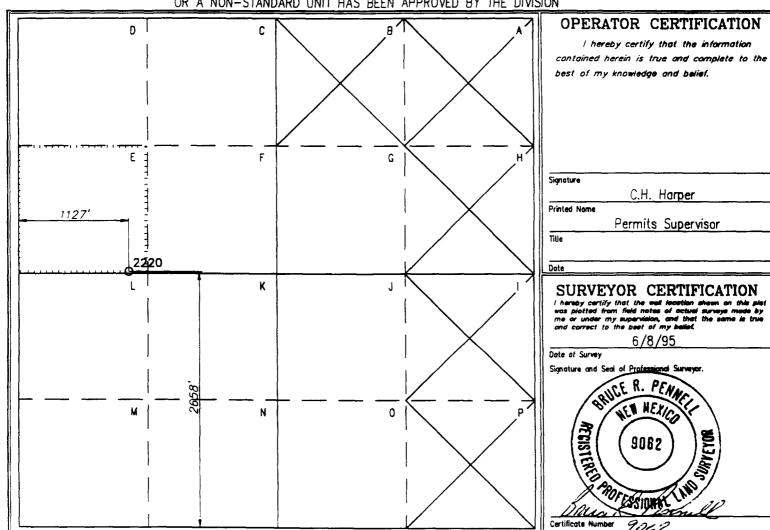
#### Surface Location

UL or lot no.	Section	Township	Range	Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
E	32	20S	28E		2658'	SOUTH	1127'	WEST	EDDY

#### Bottom Hole Location If Different From Surface

UL or 10t no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint o	or Infilt	Consolidation Co	de	Order Na.				
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNITL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



Form 3160-3 July (992)

#### SUBMIT IN TRIPLICATE\*

(Other instructions on reverse side)

FORM APPROVED OMB NO. 1004-0136

### UNITED STATES DEDARTMENT OF THE INTERIOR

Expires: February 29, 1995

	BUREAU		5. LEASE DESIGNATION NMNM 01119	N AND SERIAL NO.		
APPLICA	TION FOR PE	RMIT TO DRIL	L OR DEEPEN	١	6. IF INDIAN, ALLOTTI	E OR TRIBE NAME
a. TYPE OF WORK 5. TYPE OF WELL OIL WELL  WELL	RILL 🛭 OTHER	DEEPEN 🗆		CULTIPLE	T. UNIT AGREEMENT :  AVALON (DELAMARE  8. FARM OR LEASE NA	ME. WELL NO.
L NAME OF OPERATOR		N: REGULATOR	Y AFFATRS MI	<b>±1</b> 4	2216 9. API WELL NO.	, UNII
. ADDRESS AND TELEPH			T ATTALKS IN	- <del> </del>	9. API WELL NO.	
	MIDLAND,	TX 79702			10. FIELD AND POOL, G	
LOCATION OF WELL( (F At surface	Report location clearly and in	accordance with any State requi	rements.*)		AVALON DELAMARE	
2564' FNL	& 1377' FEL				II. SEC., T., R., M., OR I	
\t proposed prod. zone					SEC 31, T20	S, R28E
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5.5 MI. NORTH O				•	EDDY	NM
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3. DISTANCE FROM PROP TO NEAREST WELL, DE	POSED LOCATION*		9. PROPOSED DEPTH 4500	20. ROT	TARY OR CABLE TOOLS	
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i.		PROPOSED CASING AN	D CEMENTING PROGRAM	1		· - <del>-</del> -
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20"	16"	LINE PIPE	40'	40	CU. FT. TO S	URF.
14 3/4	10 3/4	40.4#/K-55	600'	350	CU. FT. TO	SURF.
9 1/2"	7 5/8"	26.4#/K-55	2540'	500	CU. FT. TO	SURF.
6 3/4"	4 1/2"	4.56#/**	****	300	CU. FTLNR	. TOP
SIMULTANEOU **** 4 1/2"  CSG.  16"  10 3/4"  7 5/8"  4 1/2"  FOR SURFACTOR	USLY DEDICAT " PROD. STRI  CMT. TY REDI-MI LITE CM LITE CM CLASS " E USE PLAN A LE. BOND CO IS BEING PR T BOND NUMBE	IX MT. & CLASS " MT. & CLASS "	***4 1/2" TO TD.  C" C" DRILLING EIGHT POINT JANT TO 43 C (XON CORPORA (BLM BOND N	PROD. S' DURATION PLAN RE FR 3104 TON'S NA' O. 0024)	TRING IS FIB  WILL BE 20 FER TO UNITW FOR LEASE TIONWIDE OIL	DAYS. IDE
signed Signed	nent data on subsurface location	ns and measured and true vertica	Alex M. Cor	er program, it any.		5) 688-67
This space for Federal of PERMIT NO.	,		APPROVAL DATE			·····
APPROVED BY		TITLE :			DATE	

District 1. PO Box 1980, Hobbs, NM 88241-1980

strict II

PO Drawer DD, Artesia, NM 88211-0719

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

PO Box 2088, Santa Fe, NM 87504-2088

# State of New Mexico Energy, Minerals & Natural Resources Department

Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
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Fee Lease - 3 Copies

#### OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

☐ AMENDED REPORT

WELL.	LOCATION	AND	ACREAGE	DEDICATION	PI.AT
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API Number	Pool Code 03715	Pool Nome AVALON DELAWARE 3715
Property Code	Property Nome AVALON (DELAWARE) UNIT	Well Number 2216
00710 No. 007673	Operator Name Exxon Corp.	Elevation 3233'

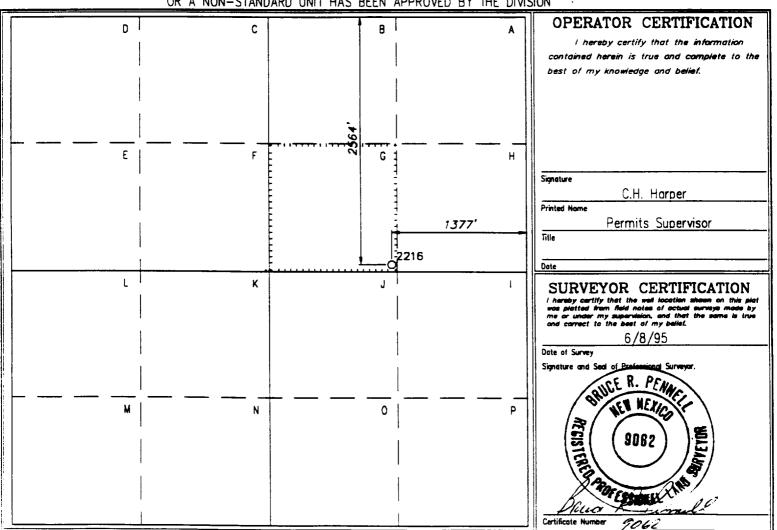
#### Surface Location

UL or lot no.	Section	Township	Range	Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
G	31	20S	28E		2564'	NORTH	1377'	EAST	EDDY

#### Bottom Hole Location If Different From Surface

UL or let no.	Section	Township	Range	Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint or	infill	Consolidation Co	de	Order No.	· · · · · · · · · · · · · · · · · · ·	·		<del></del>
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNITL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



Form 3160-3 (July 1992)

# UNITED STATES

SUBMIT IN TRIPLICATE\*
(Other instructions on reverse side)

FORM APPROVED
OMB NO. 1004-0136
Expires: February 29, 1995

# DEPARTMENT OF THE INTERIOR

		ENTOF THE IN			
	BUREAU (	OF LAND MANAGE			s. Lease designation and serial No. NMNM 01119
APPLICA	TION FOR PE	RMIT TO DRILL	OR DEEPEN		6. IF INDIAN, ALLOTTEE OR TRIBE NAME
a. TYPE OF WORK		DEEDEN []			7. UNIT AGREEMENT NAME
TYPE OF WELL	RILL 🛛	DEEPEN 🗆			AVALON (DELAMARE) UNIT
OIL WELL 🖾	GAS WELL OTHER		SINGLE MULTIP	LE 🗆	8. FARM OR LEASE NAME, WELL NO.
NAME OF OPERATOR		N. BEGILLATORY	AFFAIRS ML#14	<u> </u>	AVALON (DELAMARE) UNIT
ADDRESS AND TELEPHO	ONE SO.		AFFAIRS MEHI-	<del>-</del>	9. API WELL NO.
	MIDLAND,				10. FIELD AND POOL, OR WILDCAT
		accordance with any State requires	nents.")		AVALON DELAMARE 3715
1388 FNL 8	& 2750' FWL				11. SEC., T., R., M., OR BLK. AND SURVEY OR AREA
At proposed prod. zone					SEC 31, T20S, R28E
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5.5 MI. NORTH OF			,		EDDY NM
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-		PROPOSED CASING AND	CEMENTING PROGRAM		
SIZE OF HOLE	GRADE, SIZE OF CASIS	NG WEIGHT PER FOOT	SETTING DEPTH	<u> </u>	QUANTITY OF CEMENT
20"	16"	LINE PIPE	40'	40	CU. FT. TO SURF.
14 3/4	10 3/4	40.4#/K-55	600'	350	CU. FT. TO SURF.
9 1/2"	7 5/8"	26.4#/K-55	2540'	500	CU. FT. TO SURF.
		60 16 ×× 47	DOLG TE AT AN		
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SIMULTANEOU **** 4 1/2* CSG.	USLY DEDICAT PROD. STRI	ED W/ # NG FROM 2300'	***4 1/2" PR		
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District ! 70 Box 1980, Hobbs, NM 88241-1980

State of New Mexico Energy, Minerals & Natural Resources Department

Form C-102 Revised February 10, 1994 Submit to Appropriate District Office State Lease -4 Copies Fee Lease - 3 Copies

District II PO Drawer DD, Artesia, NM 68211-0719

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

1000 Rio Brasos Rd. , Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088

Joint or Infill

Consolidation Code

Distance to negrest Town

CARLSBAD

, New Mexico.

<u>5.5</u> Miles N of

Dedicated Acres

40

□ AMENDED REPORT

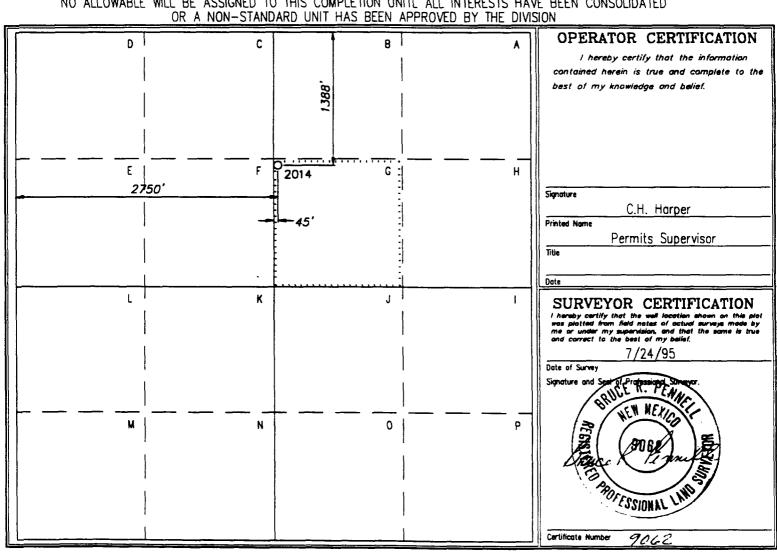
Drawing File Name

File No - A100812

		_ W	ELL L	OCATION	AND AC	CREAGE	DEDICATION	PLAT	
	API Numbe	f			ool Code 3715		AVA	Pool Nome LON DELAWARE	3715
Proper	ty Code					perty Name DELAWARE)	UNIT		Well Number 2014
oca 0070	D No. 573				,	rator Name on Corp.			Elevation 3240'
		· ·			Surface	Locati	on		
JL or lot no.	Section 31	Township 205	Range 28E	Lot Idn	Feet from the 1388	North/South NORTH	1	East/West line WEST	County EDDY
	<u> </u>	Во	ttom	Hole Lo	cation 1	f Differ	ent From S	urface	
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South	line Feet from the	East/West line	County

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNITL ALL INTERESTS HAVE BEEN CONSOLIDATED

Order No.



Drawn By

SRP

8/2/95

# HINKLE, COX, EATON, COFFIELD & HENSLEY P.L.L.C.<sup>‡</sup>

PAUL W. EATON
CONRAD E. COFFIELD
AROLD I. HENSLEY, JR
STUART D. SHANOR
ERIC D. LAMPHERE
C. D. MARTIN
C. D. MARTIN
MASTON C. COURTINE™
DON L. PATTERSON™
DOUGLAS L. LUNSFORD
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR
WILLIAM B. BURFORD'
RICHARD E. OLSON
RICHARD E. OLSON
RICHARD E. OLSON
RICHARD W. ILFONG
T. HOMAS J. MCBRIDE
NANY S. CUISACK
S. CUISACK

JEFFREY L FORNACIARI
JEFFREY D LEWETT
JAMES BRUCE
JERRY F. SHACKELFORD\*
JEFFREY W HELLBERG\*
WILLIAM F. COUNTISS\*
THOMAS M. HNASKO
JOHN C. CHAMBERS\*
GARY D. COMPTON\*
W. H. BRIAN, JR\*\*
RUSSELL J BAILEY\*
THOMAS D. HAINES, JR
GREGORY J. NIBERT
MARK C. DOW
FRED W. SCHWENDIMANN
JAMES M. HUDSON
JAMES M. HUDSON

\*REGISTERED IN NEW MEXICO AS HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., LTD., CO. ATTORNEYS AT LAW

218 MONTEZUMA POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554 FAX (505) 982-8623

LEWIS C. COX, JR (1924-1993) CLARENCE E. HINKLE (1901-1985)

OF COUNSEL
O M CALHOUN\* JOE W WOOD
RICHARD L CAZZELL\*\* RAY W RICHARDS\*\*
L A WHITE\*\*

AUSTIN AFFILIATION
HOFFMAN & STEPHENS, PC
KENNETH R. HOFFMAN\*
TOM D STEPHENS\*
RONALD C SCHULTZ, JR\*
JOSÉ CANO\*

JEFFREY S BAIRD\*
THOMAS E. HOOD\*
REBECCA. NICHOLS JOHNSON
STANLEY K. KOTOVSKY, JR.
H. THOMAS
ELLEN S. CASEY
MARGARET CARTER LUDEWIG
S BARRY PAISNER
MARTIN MEYERS
WYATT L. BROOKS\*
DAVID M. RUSSELL\*
ANDREW J. CLOUTIER
STEPHANIE LANDRY
KIRT E. MOELLING\*
DIANE FISHER
JULIE P. NEERKEN
WILLIAM P. SALATTERY
CHRISTOPPER M. MOODY

JAMES A GILLED
MARGARET R MCN.
LISA K SMITH
NORMAN D EWA
DARREN T GROD
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MARCIA B LINCO.
SCOTT A SHLARI
PAUL G NASC
R TREVY ARVIZ.
AMY C WRIGHT
BRADLEY G BISH
KAROLYN KING NE.
ELLEN T LOUDCRA!
BARBARA GREGG G.
JAMES H WOOD

\*NOT LICENSED IN NEW MEXICO \*FORMERLY COMPRISING THE FIRM OF CULTON, MORGAN, BRITAIN & WHITE, P.C

# August 11, 1RECEIVED

#### HAND DELIVERED

AUG 1 1 1995

Michael E. Stogner Oil Conservation Division 2040 So. Pacheco Street Santa Fe, New Mexico 87502

Oil Conservation Division

Re: Exxon Corporation's application for administrative approval of four unorthodox well locations in the proposed Avalon (Delaware) Unit

Dear Mr. Stogner:

Regarding the July 27, 1995 letter application by Alex Correa of Exxon: As you know, in Case No. 11297 Exxon requested 18 unorthodox well locations as part of the waterflood project for the Unit. Unfortunately, most of those locations were not staked at the time of hearing. After staking, it turns out most of the locations requested at the hearing are wrong. Attached for your information is a chart listing the locations requested at hearing and the current locations.

As a result of these changes, Mr. Correa requested administrative approval for the four injection wells, which will be the first four wells drilled for the proposed Unit. Exxon felt this application was necessary due to the changed locations.

We appreciate your attention to this matter. Please call if you have any questions.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Enclosure

cc: William T. Duncan, Jr.

# EXHIBIT "A"

CASE NO. 11297 ORDER NO. R- Exxon Corporation Unorthodox Well Locations Avalon (Delaware) Unit Waterflood Project Area

# Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico

	Originally		Actual Staked
Well Name and Number	Proposed Location	Section	Location
AVALON DELAWARE UNIT 1212	668 FNL & 14	30	FNL & 1452'
DELAWARE UNIT	0 FSL & 1485	30	1485'
DELAWARE UNIT 16	FIS.	30	FSL & 148
DELAWARE UNIT	ы	30	No change
DELAWARE UNIT	FR	31	101' FNL & 1355' FWL
DELAWARE UNIT	23 FN		change
DELAWARE UNIT	N		
	ĪΞ		nange
DELAWARE	互		1388' FNĻ & 2750' FWL
	317 F		' FNL &
	600 F		nange
DELAWARE UNIT	щ		' FSL & 2
DELAWARE	999	31	2564' FNL & 1377' FEL
AVALON DELAWARE UNIT 2218	423 F		FSL & 7
AVALON DELAWARE UNIT 2220	ĮΤ		_
AVALON DELAWARE UNIT 2412	Ĺτι		No change
AVALON DELAWARE UNIT 2418	Ιų		ange
24	FSL & 1107 F		1333' FSL & 1107' FWL
AVALON DELAWARE UNIT 2016*	FNL & 13		No change

<sup>\*</sup>Already drilled under prior Division Order (previously designated the Exxon Corporation Yates "C" Fed. #36).