

## Mike Stogner

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**From:** Frank Chavez  
**To:** Tim Gumm; Jerry Sexton; David Catanach; Mike Stogner; Rick\_Foppiano  
**Subject:** Rule 111  
**Date:** Friday, February 14, 1997 12:11PM

Comment on proposed Rule 111:

The definition of "producing area" does not allow for an "L" shaped project area.

It isn't clear that a project well has to penetrate or produce from each of the tracts in a project area. Also, if a horizontal hole is plugged back from a tract, the dedicated area will have to be reduced.

111.B.(2) Delete the reference to the D.S. Just say ". . . the operator shall run a directional survey . . ."

111.C.(4) The directional survey is to be filed with the C-104.

## 1. Introduction

- ~~What <sup>can</sup> be improved~~
- What's wrong w/ current
- What could be improved