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William F. Carr

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February 14, 2003

**HAND-DELIVERED**

Lori Wrotenbery, Director  
Oil Conservation Division  
New Mexico Energy, Minerals and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87504

**RECEIVED**

FEB 14 2003

Oil Conservation Division

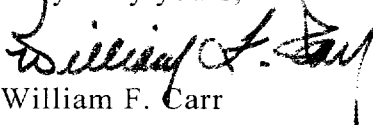
*Case 13016*

Re: Application of Paladin Energy Corp. for an unorthodox well location, Lea County, New Mexico.

Dear Ms Wrotenbery:

Enclosed in triplicate is the Application of Paladin Energy Corp. in the above-referenced case as well as a copy of a legal advertisement. Paladin requests that this application be placed on the docket for the March 13, 2003 Examiner hearings.

Very truly yours,

  
William F. Carr

Enclosures

cc: Gail Boline (w/ enclosures)

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

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Oil Conservation Division

**IN THE MATTER OF THE APPLICATION OF  
PALADIN ENERGY CORP. FOR  
AN UNORTHODOX WELL LOCATION,  
LEA COUNTY, NEW MEXICO.**

CASE NO. 13016

**APPLICATION**

PALADIN ENERGY CORP. ("Paladin"), through its undersigned attorneys, hereby makes application for an order approving an unorthodox gas well location in the Wolfcamp formation for its State "C" Well No. 1 to be re-entered and re-completed in Unit E of Section 36, Township 13 South, Range 37 East, NMPM, Lea County, New Mexico. In support of its application, Paladin states:

1. Paladin is the operator of the SE/4 NE/4 of Section 35 and the SW/4 NW/4 of Section 36 of Township 13 South, Range 37 East, NMPM, which, in a companion application, it seeks approval to unitize.

2. Paladin seeks an exception to Division Rule 104.B(1) to permit it to recomplete its State "C" Well No. 1 from the Devonian formation at an unorthodox location 1550 feet from the North line and 10 feet from the West line of said Section 36 in the Pennsylvanian and the Wolfcamp formations, King-Wolfcamp Pool.

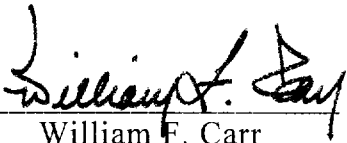
3. Approval of this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

3. Approval of this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Paladin Energy Corp. requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 13, 2003 and after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted,

HOLLAND & HART LLP

By: 

William F. Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR PALADIN ENERGY  
CORP.

**CASE 13016 :** **Application of Paladin Energy Corp. for an unorthodox gas well location, Lea County, New Mexico.** Applicant in the above-styled cause seeks approval of an unorthodox well location in the Pennsylvanian and Wolfcamp formations, King-Wolfcamp Pool, for its State "C" Well No. 1 to be re-entered and re-completed from the Devonian to the Wolfcamp formation at an unorthodox well location 1550 feet from the North line and 10 feet from the West line of said Section 36, Township 13 South, Range 37 East, NMPM. Said well is located approximately 9 miles east of McDonald, New Mexico.