3934 F.M. 1960 West, Suite 240 Houston, Texas 77068 (713) 537-9000 FAX (713) 537-8624

AUG 25 1989
OIL CONSERVATION GIV.
SANTA FE

August 23, 1989

Mike Stogner Energy and Minerals Dept. Oil Conservation Division 310 Oil Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

Re: Unorthodox Location and Density Exceptions Grace Federal 24-1R 330' FNL x 2130' FWL Rio Arriba County, New Mexico Called France time

Dear Mr. Stogner

This letter and accompanying attachments are presented for OCD approval allowing a necessary second well on a 160 oil proration unit and an unorthodox location exception for the referenced well.

The Grace Federal 24-IR has been staked at a location 330' FNL and 2130' FEL to obtain, within topographic restrictions, a location allowing for maximum well spacing in the NW/4 Section 24-T24N-R7W, Rio Arriba County, New Mexico.

The original well, Grace Federal 24-I was drilled and completed on July 23, 1980, through Mayre I and Mayre 2 sand perforations. Recovery through 1988 was 3758 BO and 55.I MMCFG. This well has been temporarily abandoned with permanent abandonment procedures to commence before September 15, 1989.

Federal 24-2 was drilled in December, 1988, with first delivery occurring in January 1989. Performance on this well is consistent with offset well data indicating a  $p_h$  distribution of 1.67 which results in an OOIP of + 7650 BO per acre. Using 160 acre spacing the OOIP should approximate 1,224,000 BO. We believe that a combination drive of solution gas and/or secondary gas gap In either expect a 15% recovery, expansion exist. case. we perhaps as low as 10%. Utilizing the 10% value results in 122,000 BO per well spaced on 160 acres. Not allowing for lateral pay discontinuities and vertical heterogeneity. To date, offset recoveries, on a per well basis, range from a low of 1500 BO to a high of 90,000 BO. Gas-oil ratios on offset wells range from + 8000:1 to a high of 40,000:1, both within industry recognized limits of producing oil wells.

It is our opinion that to economically recover existing resources, additional development in this quarter section will be required. As I have pointed out previously, we have applied for a permit to drill the replacement well; Grace Federal 24-1R. The staked location provides optimum wellbore spacing differential at an economical cost due to terrain restraints.

Offset operators have been notified of this intention as evidenced by the attached letters requesting Certified Return Receipts.

We would appreciate your prompt cooperation in approving this plan.

(Carla)

Very truly yours

W. J. Holcomb Operating Agent Bannon Energy, Inc.

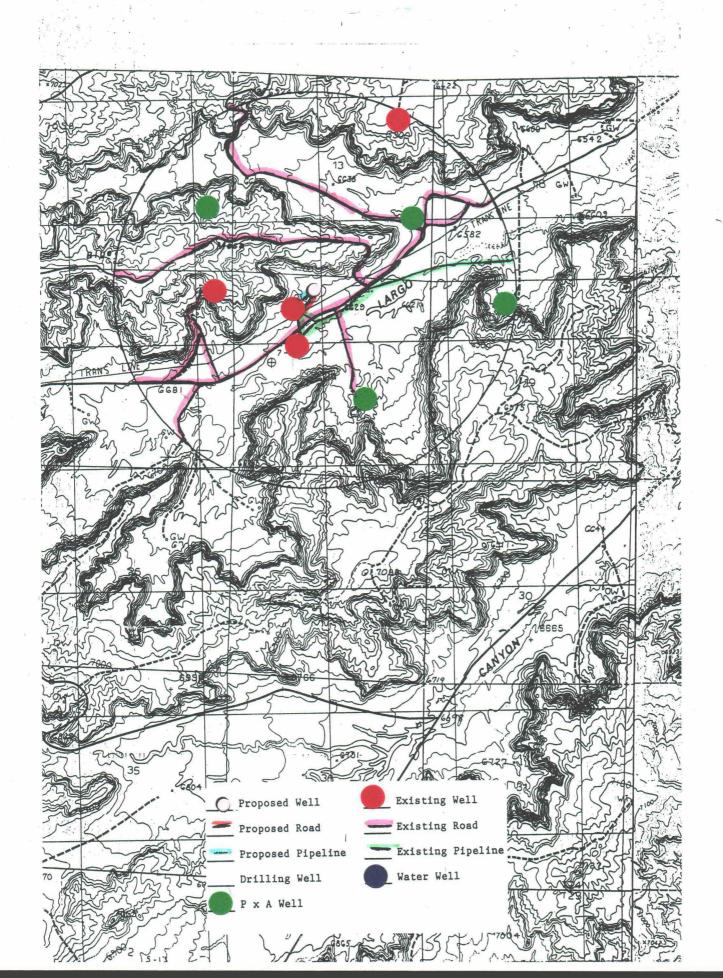
WJH:ck

Attachments

- Dependent for Jop. Reguest

- Results for Jop. Reguest

- Represent to be sieles



3934 F.M. 1960 West, Suite 240 Houston, Texas 77068 (713) 537-9000 FAX (713) 537-8624

August 24, 1989

Flag-Redfern Oil Company 1200 Wall Towers W. Box 11050 Midland, Texas 79702

Re: Unorthodox Location and Density Exception Grace Federal 24-LR 330' FNL x 2130' FWL

Rio Arriba County, New Mexico

This letter is to notify you of Bannon Energy, Inc.'s application for permit to drill the Grace Federal 24-1R at a non-standard location as stated above. Additionally, we feel a second well on the 160 acre proration unit is required to economically produce the recognized resource base.

The Grace Federal 24-1R is to be drilled as a replacement well for the Grace Federal 24-1 which will be abandoned on or about September 15, 1989.

Should you have any questions regarding this matter, please call Brad Salzman at this office, (505) 326-0550.

Sincerely

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

RETURN RECEIPT REQUESTED

3934 F.M. 1960 West, Suite 240 Houston, Texas 77068 (713) 537-9000 FAX (713) 537-8624

August 24, 1989

BCO 135 Grant Santa Fe, New Mexico 87501

Re: Unorthodox Location and Density Exception Grace Federal 24-1R 330' FNL x 2130' FWL Rio Arriba County, New Mexico

This letter is to notify you of Bannon Energy, Inc.'s application for permit to drill the Grace Federal 24-1R at a non-standard location as stated above. Additionally, we feel a second well on the 160 acre proration unit is required to economically produce the recognized resource base.

The Grace Federal 24-1R is to be drilled as a replacement well for the Grace Federal 24-1 which will be abandoned on or about September 15, 1989.

Should you have any guestions regarding this matter, please call Brad Salzman at this office, (505) 326-0550.

Sincerely/

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

RETURN RECEIPT REQUESTED

3934 F.M. 1960 West, Suite 240 Houston, Texas 77068 (713) 537-9000 FAX (713) 537-8624

August 24, 1989

J. A Cole Production P.O. Box 191 Farmington, New Mexico 87499

Re: Unorthodox Location and Density Exception Grace Federal 24-1R 330' FNL x 2130' FWL Rio Arriba County, New Mexico

This letter is to notify you of Bannon Energy, Inc.'s application for permit to drill the Grace Federal 24-JR at a non-standard location as stated above. Additionally, we feel a second well on the J60 acre proration unit is required to economically produce the recognized resource base.

The Grace Federal 24-IR is to be drilled as a replacement well for the Grace Federal 24-1 which will be abandoned on or about September 15, 1989.

Should you have any questions regarding this matter, please call Brad Salaman at this office, (505) 326-0550.

Sincerely

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

RETURN RECEIPT REQUESTED

### HOLCOMB OIL AND GAS

1) Box 2058 • These [505] 326 0550 • Farmington New Mexico 67499

August 28, 1989

AUG 2 9 1989
OIL CONSERVATION DIV.

BCO 135 Grant Santa Fe, New Mexico 87501

Re: Unorthodox Location and Density Exception Grace Federal 24-JR
330' FNL x 2130' FWL
NW/4 Sec. 24, T24N-R/W
Rio Arriba County, New Mexico

The letter dated August 24, 1989 informing you of Bannon Energy's application for permit to drill in an unorthodox location omitted the specific location of Grace Federal 24-1R. The location is NW/4 Sec. 24, T24N-R7W.

Should you have any questions regarding this matter. please call Brad Salzman at this office, (505) 326-0550.

Sincerely

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

cc: Mike Stogner Santa Fe. NM

August 28, 1989

Flag-Redfern Oil Company 1200 Wall Towers W. Box 11050 Midland, Texas 79702

Re: Unorthodox Location and Density Exception Grace Federal 24-1R 330' FNL x 2330' FWL NW/4 Sec. 24, T24N-R7W Rio Arriba County, New Mexico

The letter dated August 24. 1989 informing you of Bannon Energy's application for permit to drill in an unorthodox location omitted the specific location of Grace Federal 24-1R. The location is NW/4 Sec. 24, T24N-R7W.

Should you have any questions regarding this matter, please call Brad Salzman at this office, (505) 326-0550.

Sincerely

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

cc: Mike Stogner Sapta Fe, NM

# HOLCOMB OIL AND GAS

Box 2058 \* Phone (505) 326-0550 \* Farmington, New Mexico 87499

August 28, 1989

J. A Cole Production P.O. Box 191 Farmington, New Mexico 87499

Re: Unorthodox Location and Density Exception Grace Federal 24-lR 330' FNL x 2130' FWL NW/4 Sec. 24, T24N-R7W Rio Arriba County, New Mexico

The letter dated August 24, 1989 informing you of Bannon Energy's application for permit to drill in an unorthodox location omitted the specific location of Grace Federal 24-1R. The location is NW/4 Sec. 24, T24N-R7W.

Should you have any questions regarding this matter, please call Brad Salzman at this office, (505) 326-0550.

Sincerely

W. J. Holcomb Operating Agent, Bannon Energy, Inc.

WJH/ck

cc: Mike Stogner Santa Fe, NM