

# MONTGOMERY & ANDREWS

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

J. O. Seth (1883-1963)  
Frank Andrews (1914-1981)

A. K. Montgomery  
Seth D. Montgomery  
Frank Andrews III  
Victor R. Ortega  
John E. Conway  
Jeffrey R. Brannen  
John B. Pound  
Gary R. Kilpatrick  
Thomas W. Olson  
William C. Madison  
Walter J. Melendres  
Bruce L. Herr  
Michael W. Brennan  
Robert P. Worcester  
John B. Draper  
Nancy M. Anderson  
Janet McL. McKay

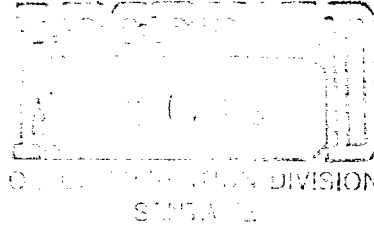
Jean-Nikole Wells  
Mark F. Sheridan  
Joseph E. Earnest  
Stephen S. Hamilton  
Phyllis A. Dow  
Wm. Alan Wright  
Brad V. Coryell  
Wesley B. Howard, Jr.  
Thurman W. Moore III  
Michael H. Harbour  
John M. Hickey  
Timothy L. Butler  
Mack E. With  
Galen M. Buller  
Katherine A. Weeks  
Edmund H. Kendrick

June 29, 1984

SANTA FE OFFICE  
325 Paseo de Peralta  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

Telephone (505) 982-3873  
Telecopy (505) 982-4289

ALBUQUERQUE OFFICE  
Suite 200  
500 Copper Avenue, N.W.  
Post Office Box 2048  
Albuquerque, New Mexico 87103-2048  
Telephone (505) 242-9677



REPLY TO SANTA FE OFFICE

New Mexico Energy and  
Minerals Department  
Oil Conservation Division  
State Land Office Building  
Santa Fe, New Mexico 87503

Re: OCC Cases 8262, 8263 and 8264

Gentlemen:

Please be advised that Michael Fredette of the office of General Counsel of Shell Western E & P, Inc., Houston, Texas, is associated with our firm for the presentation of evidence and argument in the above-referenced cases.

Sincerely,

Edmund H. Kendrick

EHK:gar  
#2355-84-01

cc: Mr. Mike Fredette

# MONTGOMERY & ANDREWS

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

J. O. Seth (1883-1963)  
Frank Andrews (1914-1981)

A. K. Montgomery  
Seth D. Montgomery  
Frank Andrews III  
Victor R. Ortega  
John E. Conway  
Jeffrey R. Brannen  
John B. Pound  
Gary R. Kilpatric  
Thomas W. Olson  
William C. Madison  
Walter J. Melendres  
Bruce L. Herr  
Michael W. Brennan  
Robert P. Worcester  
John B. Draper  
Nancy M. Anderson  
Janet McL. McKay

Jean-Nikole Wells  
Mark F. Sheridan  
Joseph E. Earnest  
Stephen S. Hamilton  
Phyllis A. Dow  
Wm. Alan Wright  
Brad V. Coryell  
Wesley B. Howard, Jr.  
Thurman W. Moore III  
Michael H. Harbour  
John M. Hickey  
Timothy L. Butler  
Mack E. With  
Galen M. Buller  
Katherine A. Weeks  
Edmund H. Kendrick

June 29, 1984

HAND DELIVERED

SANTA FE OFFICE  
325 Paseo de Peralta  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

Telephone (505) 982-3873  
Telecopy (505) 982-4289

ALBUQUERQUE OFFICE  
Suite 200  
500 Copper Avenue, N.W.  
Post Office Box 2048  
Albuquerque, New Mexico 87103-2048  
Telephone (505) 242-9677

REPLY TO SANTA FE OFFICE

Mr. Perry Pearce  
General Counsel  
Oil Conservation Commission  
Energy & Minerals Department  
State Land Office  
Santa Fe, New Mexico 87504

Re: OCC Cases 8262, 8263 and 8264

Dear Perry:

On behalf of Shell Western E & P, Inc., I am enclosing,  
for filing, an original and two copies of applications in  
the above-referenced cases.

Sincerely,



Edmund H. Kendrick

EHK:gar  
Enclosure  
#2355-84-01

cc: Michael J. Fredette, Esquire

# MONTGOMERY & ANDREWS

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

J. D. Seth (1883-1963)  
Frank Andrews (1914-1981)

A. K. Montgomery  
Seth D. Montgomery  
Frank Andrews III  
Victor R. Ortega  
John E. Conway  
Jeffrey R. Brannen  
John B. Pound  
Gary R. Kilpatrick  
Thomas W. Olson  
William C. Madison  
Walter J. Melendres  
Bruce L. Herr  
Michael W. Brennan  
Robert P. Worcester  
John B. Draper  
Nancy M. Anderson  
Janet McL. McKay

Jean-Nikole Wells  
Mark F. Sheridan  
Joseph E. Earnest  
Stephen S. Hamilton  
Phyllis A. Dow  
Wm. Alan Wright  
Brad V. Coryell  
Wesley B. Howard, Jr.  
Thurman W. Moore III  
Michael H. Harbour  
John M. Hickey  
Timothy L. Butler  
Mack E. With  
Galen M. Buller  
Katherine A. Weeks  
Edmund H. Kendrick

June 19, 1984

HAND DELIVERED

SANTA FE OFFICE  
325 Paseo de Peralta  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

Telephone (505) 982-3873  
Telecopy (505) 982-4289

ALBUQUERQUE OFFICE  
Suite 200  
500 Copper Avenue, N.W.  
Post Office Box 2048  
Albuquerque, New Mexico 87103-2048

Telephone (505) 242-9677

REPLY TO SANTA FE OFFICE

Mr. Perry Pearce  
General Counsel  
Oil Conservation Commission  
Energy & Minerals Department  
State Land Office  
Santa Fe, New Mexico 87504

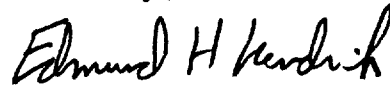
Re: Application of Shell Western E & P Inc.  
Before the OCC

Dear Perry:

Per our discussion today, I am attaching information forming the basis for a verbal application under Rule 1203 of OCD Rules and Regulations. Mr. Fredette or I will be in touch with you tomorrow to inform you whether Shell wishes to place the newspaper notices required for a July 11, 1984 hearing.

Thank you for your consideration in this matter.

Sincerely,



Edmund H. Kendrick

EHK:gar  
Enclosure  
#2355-84-01  
cc: Mr. Mike Fredette

Applicant: Shell Western E&P Inc.

Unit (or Lease): North Hobbs (Grayburg-San Andres) Unit

Pool: Hobbs (Grayburg-San Andres) Pool,  
Lea County, New Mexico

Wells: Proposed locations listed on attachment

Application: 38 Infill Wells

(A) For each well:

(1) Well is necessary to effectively and efficiently drain a portion of the reservoir covered by the proration unit which cannot be so drained by any existing well within that unit.

(2) Approval of unorthodox location.

(B) For wells indicated by asterisk: permission to directionally drill.

OFFSET OPERATORS:

Amoco Production Company (USA)  
P.O. Box 3092  
Houston, TX 77253

Moramco  
P.O. Box 1860  
Hobbs, NM 88240

GAS PURCHASER:

Phillips Petroleum Co.  
Attn: Laws and Regulations  
336 H.S. & L. Building  
Bartlesville, OK 74004

STAKING LOCATIONS  
NORTH HOBBS (G/SA UNIT INFILL)  
Lea County, NM

<u>Well No.</u>	<u>Location</u>	<u>Sec.</u>	<u>TWP</u>	<u>RNG</u>
13-342	1200' FSL, 2500' FEL	13	18S	37E
13-442	1200' FSL, 220' FEL	13	18S	37E
24-312	10' FNL, 2630' FEL	24	18S	37E
24-414	10' FNL, 1280' FEL	24	18S	37E
19-212	1460' FWL, 160' FNL	19	18S	38E
24-432	1280' FEL, 2480' FSL	24	18S	37E
19-232	1390' FWL, 2795' FNL	19	18S	38E
20-132	180' FWL, 2490' FSL	20	18S	38E
24-442	200' FEL, 1260' FSL	24	18S	37E
19-332	2680' FWL, 1430' FSL	19	18S	38E
24-213	2620' FWL, 1280' FNL	24	18S	37E
29-442	170' FEL, 1230' FSL	29	18S	38E
* 28-242	Suf 2014' FWL, 1163' FSL Bhl 2400' FWL, 1100' FSL	28	18S	38E
30-242	1400' FWL, 200' FSL	30	18S	38E
30-444	215' FSL, 1255' FEL	30	18S	38E
32-312	1400' FEL, 210' FNL	32	18S	38E
* 33-312	Suf 1830' FEL, 110' FNL Bhl 1330' FEL, 10' FNL	33	18S	38E
32-422	110' FEL, 1385' FNL	32	18S	38E

<u>Well No.</u>	<u>Location</u>	<u>Sec.</u>	<u>TWP</u>	<u>RNG</u>
33-212	1420' FWL, 205' FNL	33	18S	38E
31-422	2259' FNL, 600' FEL	31	18S	38E
32-223	1410' FWL, 2630' FNL	32	18S	38E
32-423	1280' FEL, 2540' FNL	32	18S	38E
33-323	1420' FEL, 2495' FNL	33	18S	38E
32-143	300' FWL, 1185' FSL	32	18S	38E
32-332	2350' FEL, 1550' FSL	32	18S	38E
33-242	2530' FWL, 1280' FSL	33	18S	38E
19-442	380' FEL, 1100' FSL	19	18S	38E
24-342	145' FSL, 1435' FEL	24	18S	38E
30-112	200' FNL, 1310' FWL	30	18S	38E
* 30-312	Suf 500' FNL, 1448' FEL Bhl 20' FNL, 1268' FEL	30	18S	38E
30-113	1310' FNL, 195' FWL	30	18S	38E
29-322	2350' FEL, 1430' FNL	29	18S	38E
28-122	200' FWL, 1592' FNL	28	18S	38E
30-233	1480' FWL, 2455' FSL	30	18S	38E
30-332	1600' FEL, 2470' FSL	30	18S	38E
30-432	180' FEL, 2260' FSL	30	18S	38E
29-323	2500' FEL, 2540' FNL	29	18S	38E
29-122	180' FWL, 1600' FNL	29	18S	38E

\* Directional

Shell Oil Company



200 North Dairy Ashford  
P.O. Box 576  
Houston, Texas 77001

July 30, 1984

SPECIAL DELIVERY

Mr. R. L. Stamets  
State of New Mexico  
Energy and Minerals Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

Dear Mr. Stamets:

SUBJECT: OIL CONSERVATION DIVISION  
CASE NOS. 8262, 8263, AND 8264

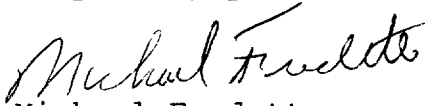
I have enclosed, for your consideration, two originals of proposed orders in Case Nos. 8263 (unorthodox locations) and 8264 (unorthodox locations and directional drilling).

A proposed order in Case No. 8262 (infill findings) will follow in the very near future.

My secretary has the proposed orders on diskette and would be happy to make any changes to the form or content.

I hope you find the enclosed proposals helpful.

Very truly yours,



Michael Fredette  
Attorney  
Legal Department, E&P - Western U.S.

MF/mwt  
Enclosures

cc: w/enclosures  
Shell Western E&P Inc.  
A. J. Fore

Shell Oil Company



200 North Dairy Ashford  
P.O. Box 576  
Houston, Texas 77001

September 13, 1984

Mr. R. L. Stamets  
State of New Mexico  
Energy and Minerals Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

Dear Mr. Stamets:

SUBJECT: OIL CONSERVATION DIVISION  
CASE NO. 8262

I have enclosed, for your consideration, two originals of a proposed order in Case No. 8262.

I apologize for the delay in getting this proposal to you. You may find the proposed order rather detailed. However, I believe this is appropriate inasmuch as the order will be referred to in future applications for well category determinations on the wells covered by the order.

My secretary has the proposed order on diskette and would be happy to make any changes to the form or content.

I hope you find the enclosed proposal helpful.

Very truly yours,

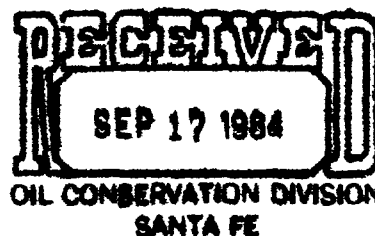
A handwritten signature in cursive script that reads "Michael Fredette".

Michael Fredette  
Attorney  
Legal Department, E&P - Western U.S.

MF/mwt

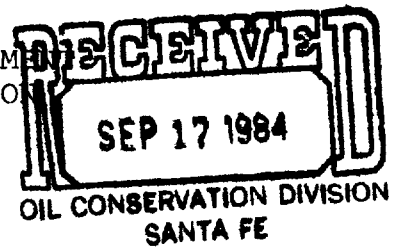
Enclosures

cc: w/enclosures  
Shell Western E&P Inc.  
A. J. Fore





STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION



IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

CASE NO. 8262  
Order No.

APPLICATION OF SHELL WESTERN  
E&P INC. FOR EFFECTIVE AND  
EFFICIENT DRAINAGE FINDINGS  
FOR INFILL WELLS, LEA COUNTY,  
NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:00 a.m. on July 11, 1984, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this \_\_\_\_\_ day of September, 1984, the Division Director, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Division has jurisdiction of this cause and the subject matter thereof.

(2) That Section 271.305(b) of the Rules of the Federal Energy Regulatory Commission promulgated pursuant to the Natural Gas Policy Act of 1978 provides that, in order for an infill well to qualify as a new, onshore production well under Section 103 of said Act, the Division must find that the infill well is necessary to effectively and efficiently drain a portion of the reservoir covered by the proration unit which cannot be so drained by any existing well within the proration unit.

(3) That the Oil Conservation Commission of New Mexico, by its Order No. R-6198 dated November 30, 1979, approved statutory unitization for the North Hobbs Grayburg-San Andres Unit Area, Hobbs Grayburg-San Andres Pool, Lea County, New Mexico, and, by its Order No. R-6199 dated November 30, 1979, authorized institution of the North Hobbs Grayburg-San Andres Unit Pressure Maintenance Project in the North Hobbs Grayburg-San Andres Unit Area.

(4) That the applicant herein, Shell Western E&P Inc., proposes to drill 35 North Hobbs Grayburg-San Andres Unit wells at the unorthodox locations described in Exhibit "A" attached hereto, under authority of Division Order No. R-7628 dated August 10, 1984, and to directionally drill three North Hobbs Grayburg-San Andres Unit Wells from the unorthodox surface locations to a point within 75 feet of the unorthodox bottom hole locations described in Exhibit "B" attached hereto, under authority of Division Order No. R-7629 dated August 10, 1984.

(5) That each well drilled under authority of Division Order No. R-7628, shall be drilled as an infill well, being the second or subsequent well drilled on an established proration unit, as described in Exhibit "A" attached hereto.

(6) That each well drilled under authority of Division Order No. R-7629, shall be drilled as an infill well, being the second or subsequent well drilled on an established proration unit, being the governmental quarter-quarter section wherein the well is ultimately bottomed as determined by means of a continuous multi-shot directional survey conducted subsequent to the directional drilling of the well pursuant to the order.

(7) That the applicant herein, Shell Western E&P Inc., seeks a finding that each well drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 is necessary to effectively and efficiently drain a portion of the reservoir covered by the proration unit for the well which cannot be so drained by any existing well within the proration unit.

(8) That the North Hobbs Grayburg-San Andres Unit Area covers approximately 10,650 surface acres, and is currently developed by 264 wells, including 191 producing wells, 68 injection wells, and 5 shut-in or temporarily abandoned wells.

(9) That the proposed infill drilling program described in Finding Nos. (4), (5), and (6) above will be conducted in the San Andres pay of the Hobbs Grayburg-San Andres Pool.

(10) That the structure is a NW-SE trending anticline that is approximately 8 miles long and 3 1/2 miles wide with nearly 400 feet of closure above the original oil-water contact, which was located at 614 feet subsea.

(11) That although the lateral continuity of the San Andres pay is considered to be good in a gross sense, very rapid facies changes, both horizontally and vertically, make

it difficult to correlate individual pay strings between wells and localized barriers to fluid flow do exist.

(12) That as a result of competitive drilling prior to unitization, wells in the North Hobbs Grayburg-San Andres Unit Area were drilled on offsetting locations only 330 feet from a corner of their respective proration units.

(13) That as a result of the lenticular nature of the reservoir rock as described in Finding No. (11) above and primary development of the North Hobbs Grayburg-San Andres Unit Area on cluster well patterns as described in Finding No. (12) above, portions of the Hobbs Grayburg-San Andres Pool covered by established proration units on which wells will be drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 have not been effectively and efficiently drained.

(14) That each well drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 will result in more effective and efficient drainage of a portion of the Hobbs Grayburg-San Andres Pool covered by the established proration unit on which the well will be drilled by improving pay continuity.

(15) That the current injection pattern in the North Hobbs Grayburg-San Andres Pressure Maintenance Project is a modified 160-acre 5-spot pattern with a producer located at each corner and the injection well in the center of the quarter section.

(16) That the injection pattern described in Finding No. (15) above has not provided an effective and efficient sweep of portions of the Hobbs Grayburg-San Andres Pool between the 160-acre patterns, due to a lack of pressure sink or drainage points in such areas.

(17) That wells drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 will be located along quarter section lines in the areas of poor sweep efficiency described in Finding No. (16) above, resulting in a more effective and efficient sweep of such areas.

(18) That each well drilled and completed under authority of Division Order No. R-7628 or Division Order No. R-7629 should result in the recovery of an additional 125,000 barrels of oil and 80 MMCF of gas which would not otherwise be recovered.

(19) That each well drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 is necessary to effectively and efficiently drain a portion of the Hobbs Grayburg-San Andres Pool covered by the proration unit for the well which cannot be so drained by any existing well within the proration unit.

4  
Case No. 8262  
Order No.

(20) That, based on the geological and engineering evidence presented in this case, the application should be approved.

IT IS THEREFORE ORDERED:

(1) That each well drilled under authority of Division Order No. R-7628 or Division Order No. R-7629 is hereby found to be necessary to effectively and efficiently drain a portion of the reservoir covered by the proration unit for the well which cannot be so drained by any existing well within the proration unit, all within the Hobbs Grayburg-San Andres Pool, Lea County, New Mexico.

(2) That jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

JOE D. RAMEY  
Director

S E A L

NORTH HOBBS GRAYBURG-SAN ANDRES UNIT AREA  
PRESSURE MAINTENANCE PROJECT

HOBBS GRAYBURG-SAN ANDRES POOL  
LEA COUNTY, NEW MEXICO

Infill Wells

TOWNSHIP 18 SOUTH, RANGE 37 EAST, NMPM

<u>Section No.</u>	<u>Unit Well No.</u>	<u>Unit Letter</u>	<u>Well Location</u>	<u>Proration Unit</u>
13	342	O	1200' FSL & 2500' FEL	SW $\frac{1}{4}$ SE $\frac{1}{4}$
13	442	P	1200' FSL & 220' FEL	SE $\frac{1}{4}$ SE $\frac{1}{4}$
24	212	C	1280' FNL & 2620' FWL	NE $\frac{1}{4}$ NW $\frac{1}{4}$
24	312	B	10' FNL & 2630' FEL	NW $\frac{1}{4}$ NE $\frac{1}{4}$
24	342	O	145' FSL & 1435' FEL	SW $\frac{1}{4}$ SE $\frac{1}{4}$
24	414	A	10' FNL & 1280' FEL	NE $\frac{1}{4}$ NE $\frac{1}{4}$
24	432	I	2480' FSL & 1280' FEL	NE $\frac{1}{4}$ SE $\frac{1}{4}$
24	442	P	1260' FSL & 200' FEL	SE $\frac{1}{4}$ SE $\frac{1}{4}$

TOWNSHIP 18 SOUTH, RANGE 38 EAST, NMPM

<u>Section No.</u>	<u>Unit Well No.</u>	<u>Unit Letter</u>	<u>Well Location</u>	<u>Proration Unit</u>
19	212	C	160' FNL & 1460' FWL	NE $\frac{1}{4}$ NW $\frac{1}{4}$
19	232	K	2795' FNL & 1390' FWL	NE $\frac{1}{4}$ SW $\frac{1}{4}$
19	332	J	1430' FSL & 2535' FEL	NW $\frac{1}{4}$ SE $\frac{1}{4}$
19	442	P	1100' FSL & 380' FEL	SE $\frac{1}{4}$ SE $\frac{1}{4}$
20	132	L	2490' FSL & 180' FWL	NW $\frac{1}{4}$ SW $\frac{1}{4}$
28	122	E	1592' FNL & 200' FWL	SW $\frac{1}{4}$ NW $\frac{1}{4}$
29	122	E	1600' FNL & 180' FWL	SW $\frac{1}{4}$ NW $\frac{1}{4}$
29	322	G	1430' FNL & 2350' FEL	SW $\frac{1}{4}$ NE $\frac{1}{4}$
29	323	G	2540' FNL & 2500' FEL	SW $\frac{1}{4}$ NE $\frac{1}{4}$
29	442	P	1230' FSL & 170' FEL	SE $\frac{1}{4}$ SE $\frac{1}{4}$
30	112	D	200' FNL & 1310' FWL	NW $\frac{1}{4}$ NW $\frac{1}{4}$
30	113	D	1310' FNL & 195' FWL	NW $\frac{1}{4}$ NW $\frac{1}{4}$
30	233	K	2455' FSL & 1480' FWL	NE $\frac{1}{4}$ SW $\frac{1}{4}$
30	242	N	200' FSL & 1400' FWL	SE $\frac{1}{4}$ SW $\frac{1}{4}$
30	332	J	2470' FSL & 1600' FEL	NW $\frac{1}{4}$ SE $\frac{1}{4}$
30	432	I	2260' FSL & 180' FEL	NE $\frac{1}{4}$ SE $\frac{1}{4}$
30	444	P	215' FSL & 1255' FEL	SE $\frac{1}{4}$ SE $\frac{1}{4}$
31	422	H	2259' FNL & 600' FEL	SE $\frac{1}{4}$ NE $\frac{1}{4}$
32	143	M	1185' FSL & 300' FWL	SW $\frac{1}{4}$ SW $\frac{1}{4}$
32	223	F	2630' FNL & 1410' FWL	SE $\frac{1}{4}$ NW $\frac{1}{4}$
32	312	B	210' FNL & 1400' FEL	NW $\frac{1}{4}$ NE $\frac{1}{4}$
32	332	J	1550' FSL & 2350' FEL	NW $\frac{1}{4}$ SE $\frac{1}{4}$
32	422	H	1385' FNL & 110' FEL	SE $\frac{1}{4}$ NE $\frac{1}{4}$
32	423	H	2540' FNL & 1280' FEL	SE $\frac{1}{4}$ NE $\frac{1}{4}$
33	212	C	205' FNL & 1420' FWL	NE $\frac{1}{4}$ NW $\frac{1}{4}$
33	242	N	1280' FSL & 2530' FWL	SE $\frac{1}{4}$ SW $\frac{1}{4}$
33	323	G	2495' FNL & 1420' FEL	SW $\frac{1}{4}$ NE $\frac{1}{4}$

EXHIBIT "A"  
CASE NO. 8262  
ORDER NO.

NORTH HOBBS GRAYBURG-SAN ANDRES UNIT AREA  
PRESSURE MAINTENANCE PROJECT

HOBBS GRAYBURG-SAN ANDRES POOL  
LEA COUNTY, NEW MEXICO

INFILL WELLS

TOWNSHIP 18 SOUTH, RANGE 38 EAST, NMPM

<u>Section</u> <u>No.</u>	<u>Unit</u> <u>Well No.</u>	<u>Surface</u> <u>Location</u>	<u>Bottom Hole</u> <u>Location</u>
28	242	1163' FSL & 2014' FWL	1100' FSL & 2400' FWL
30	312	500' FNL & 1448' FEL	20' FNL & 1268' FEL
33	312	136' FNL & 1702' FEL	10' FNL & 1330' FEL

EXHIBIT "B"  
CASE NO. 8262  
ORDER NO.