

Shell Western E&P Inc.

A Subsidiary of Shell Oil Company

March 2, 1984

P.O. Box 991 Houston, TX 77001

Mr. Joe D. Ramey
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

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Gentlemen:

SUBJECT: UNORTHODOX LOCATION - PHILLIPS OIL CO. - KGS-A NO. 1 330' FSL & 1200' FEL, UNIT P, SECTION 14, T-16-S, R-30-E HENSHAW WOLFCAMP POOL, EDDY COUNTY, NEW MEXICO

We have reviewed Phillips' application and find no justification for the subject unorthodox location. Therefore, Shell Western E&P Inc. objects to the location as proposed by Phillips Oil Company.

However, in the event an unorthodox location is permitted, we recommend a limit of 60 barrels of oil be placed on the daily production rate. SWEPI Henshaw Deep Unit No. 5, the south offsetting well, is currently producing 60 BOPD and is the basis for our suggested daily production limit. We feel this action would minimize the significant advantage gained by Phillips as a result of the proposed location over the offset producer at its orthodox location.

Yours very truly,

A. J. Fore Supervisor Regulatory and Permitting Mid-Continent Division

AJF:dmu

cc: Phillips Oil Company 4001 Penbrook St. Odessa, TX 79762

> State of New Mexico V Energy and Minerals Department Oil Conservation Division P. O. Drawer DD Artesia, NM 88210

U. S. Department of the Interior Bureau of Land Management P. O. Box 1397 Roswell, NM 88201

Offset Operators (See Attached List)