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NOV 30 1982

(New Onshore Production Wells, Section 103)

O. C. D.
ARTESIA, OFFICE

J.W. Arnold, Administrator of FERC Compliance of Sun Gas, a Division of Sun Exploration and Production Company, ("Sun"), the undersigned, being first duly sworn, deposes and says:

(1) That the surface drilling of the well for which Sun seeks a determination was begun on or after February 19, 1977.


(2) That the well satisfies applicable federal or state well-spacing requirements.

(3) That he has concluded that to the best of his information, knowledge and belief, the natural gas for which Sun seeks a determination is produced from a New Onshore Production Well and the basis for such conclusion is that a review of the records indicates that the well:

(a) was spudded on July 8, 1982

(b) Satisfies applicable state or federal well-spacing rules

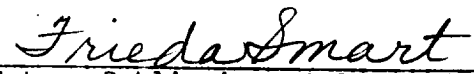
(4) That he has no knowledge of any other information which is inconsistent with his conclusion.


J.W. Arnold
Administrator, FERC Compliance

THE STATE OF TEXAS X

COUNTY OF DALLAS X

SUBSCRIBED AND SWORN TO BEFORE ME by the said J.W. Arnold on this the
22nd day of November, 19 82.


Frieda Smart
Notary Public in and for Dallas
County, Texas

My Commission Expires:

Nov. 24, 1984