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As you will note from the attached plat, this non-standard spacing and proration unit is comprised of contiguous quarter-quarter sections and lots and lies wholly within and comprises all of a single governmental section. This plat shows the subject spacing unit for this well and all adjoining spacing units or leases.

There are no owners of interest in the mineral estate which are excluded by the creation of this non-standard unit and therefore no affected parties as defined by Rule 1207.A (2). Accordingly, no notice of this application is required by Division Rule 1207(3).

Your attention to this matter is appreciated.

Very truly yours, Holland & Hart LLP By: L William **A** Carr Attorneys for ARCO (BP)

Enclosure

cc: Lee Scarborough ARCO (BP) 501 WestLake Blvd. Houston, Texas 77079