



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

Jennifer A. Salisbury  
Cabinet Secretary

October 23, 2000

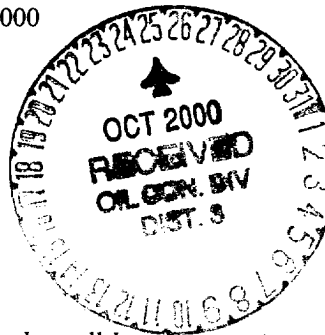
**Lori Wrotenbery**

Director

Oil Conservation Division

Conoco, Inc.  
600 N. Dairy Ashford Dubai 3066  
Houston, Texas 77079

Attention: **Deborah Marberry**



*Re: Administrative application for an exception to the well location requirements provided within the "Special Rules and Regulations for the Basin-Dakota Pool," as promulgated by Division Order No. R-10987-B, issued in Case No. 12290 and dated June 30, 2000 for Conoco, Inc.'s proposed San Juan "28-7" Unit Well No. 249-F to be drilled at an unorthodox Basin-Dakota gas well location 10 feet from the North line and 920 feet from the East line (Unit A) of Section 30, Township 28 North, Range 7 West, NMPM, Rio Arriba County, New Mexico.*

Dear Ms. Marberry:

There appears to be a discrepancy between the Division's records in Santa Fe and the information provided concerning Basin-Dakota gas production in Section 30, Township 28 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. The C-102 submitted with your application was not marked as to the dedicated acreage; however, your cover letter indicated that the N/2 equivalent of Section 30 is to be the assigned acreage. My records show that the E/2 of Section 30, being a standard 320-acre stand-up gas spacing and proration unit for the Basin-Dakota Pool, is currently dedicated to Conoco, Inc.'s San Juan "28-7" Unit Well No. 249-M (API No. 30-039-25802), located at an unorthodox gas well location (approved by Division Administrative Order NSL-3952, dated February 17, 1998) 855 feet from the South line and 2365 feet from the East line (Unit O) of Section 30 and the existing non-standard 342.17-acre gas spacing and proration unit (approved by Division Order No. R-2948, dated August 16, 1965) comprising Lot 4 and the SE/4 SW/4 of Section 19 and Lots 1, 2, 3, and 4, the E/2 NW/4, and the NE/4 SW/4 of Section 30, both in Township 28 North, Range 7 West, NMPM, Rio Arriba County, New Mexico, is currently dedicated to Conoco, Inc.'s San Juan "28-7" Unit Well No. 250 (30-039-21637) located at an unorthodox gas well location (approved by Division Administrative Order NSL-3977, dated March 17, 1998) 2500 feet from the South line and 1465 feet from the West line (Unit K) of Section 30.

Further, please provide me with a copy of the Basin-Dakota participating area for the San Juan "28-7" Unit. Thank you.

Sincerely,

Michael E. Stogner  
Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division - Aztec  
U. S. Bureau of Land Management - Farmington  
W. Thomas Kellahin, Legal Counsel for Conoco, Inc. - Santa Fe  
Ms. Lori Wrotenbery, Director NMOCD - Santa Fe  
Ms. Yolanda Perez, Conoco, Inc. - Houston