

dugan production corp.



April 3, 1998

DECEIVED N APR - 6 1938 OIL COM. DIV. DIST. 3

Ms. Lori Wrotenbery, Director New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505

Re: Request for Administrative Approval

Non-Standard Location
Dugan Production Corp.'s
Ginther Gas Com Well No. 2 (API No. 30-045-06512)
K-13-27N-13W, San Juan County, New Mexico
WAW Fruitland Sand-Pictured Cliffs Gas Pool

Dear Ms. Wrotenbery:

We are writing to request your administrative approval for the non-standard location of the captioned well.

Dugan Production acquired this well from Amoco Production Co. effective 2-2-98 and upon filing a form C-104 reflecting the change in operator, we discovered the need for a NSL approval. The Ginther No. 2 which is located 2310' FSL & 1850' FWL of Section 13 was initially completed in the Basin Dakota Pool on 8-22-59. After producing approximately 1.16 BCF of gas plus 3162 bbl condensate from the Dakota, Amoco recompleted this wellbore to the current WAW Fruitland Sand-PC pool interval on 8-21-96. To date there has been no production reported from the current Fruitland Sand completion which was tested with an initial potential of 150 MCFD + 14 BWPD. Dugan Production desires to place the Ginther No. 2 on production and since this well is located 2310' from the South line of the Section, it is also only 330' from the north line of the 160 Acre spacing unit for the current WAW Fruitland Sand-PC completion. Statewide rules require a minimum of 790' from the outer boundary and thus we respectfully request your administrative approval for this plug-back recompletion. Attachment No. 1 presents a plat of the subject spacing unit along with a description of the offsetting leases and the affected parties.

By copy of this letter, we are providing notice to our two working interest owners (Dugan holds

an 89.583% working interest) and to the lessees of record and owners of unleased minerals for all adjoining and diagonal leases offsetting the spacing unit for the Ginther No. 2. There are no offset completions in the WAW Fruitland Sand-PC pool. Attachment No. 2 is a map of the general area and the general proximity of the main products line between El Paso's Aneth and Chaco plants is likely the reason for the location of the Ginther No. 2 being unorthodox at the time of initial drilling. The offset wells on this map are all completed in the Basin Dakota gas pool.

Should you have questions or need additional information, please let me know.

Respectfully,

Jalm D. Roe

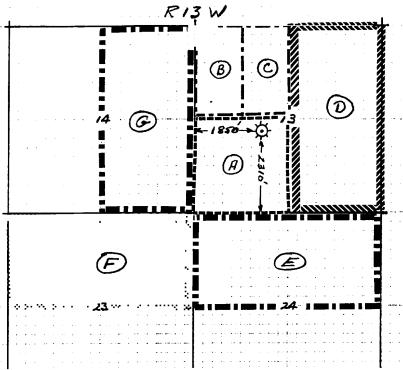
John D. Roe Engineering Manager

JDR/tmf

attachs.

cc: NMOCD - Aztec

ATTACHMENT NO. 1 - PAGE 1 OF 2



A. SW/4 160 Acre spacing unit for Dugan's Ginther No. 2. See NMOCD Form C-102 for lease details.

Working Interest Owners:

WI-%

Dugan Production Corp.

89.58334

H. S. Bennett P. O. Box 1401, Dallas, TX 75221-1401 6.2500

John R. Royall 4800 Republic Tower 325 N. St. Paul St., Dallas, TX 75201-3830 4.16666

Royalty Interest - USA - Federal Leases - SF078099 & SF078099C C/O Bureau of Land Management Attn: Mr Duane Spencer 1235 La Plata Highway, Farmington, NM 87401

B. W/2 NW/4 Section 13 - 80 Acre Federal Lease SF078099A
 Cross Timbers Oil Co.
 810 Houston Street, Suite 2000, Ft. Worth, TX 76102-6298

Burlington Resources P. O. Box 4289, Farmington, NM 87499-4289

C. E/2 NW/4 Section 13 - 80 Acre Federal Lease SF078099B Cross Timbers Oil Co.

Burlington Resources

D. E/2 Section 13 - 320 Acre Federal Lease SF078099 Cross Timbers Oil Co.

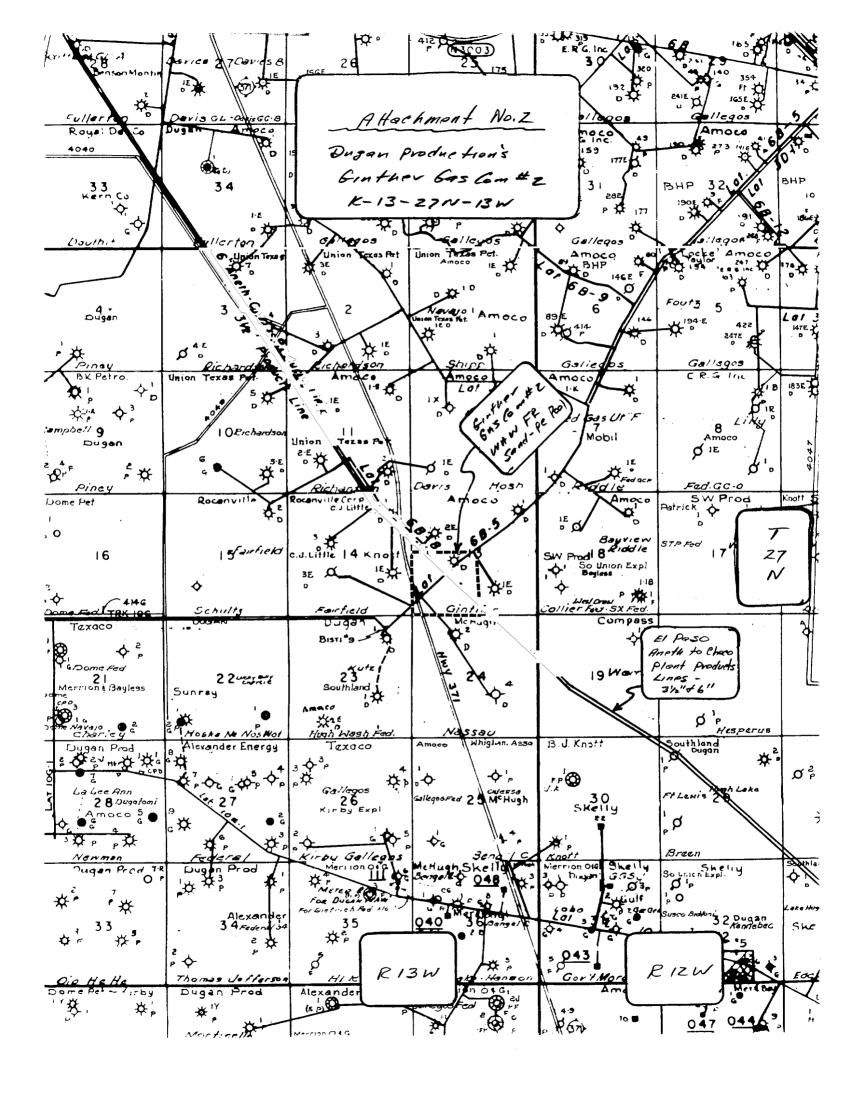
Burlington Resources

E. N/2 Section 24 - 320 Acre Federal Lease NM12033 Conoco Oil 10 Desta Drive, Suite 100W, Midland TX 79705-4500

F. N/2 Section 23, 320 Acre unleased Federal minerals
Bureau of Land Management
Attn: Mr. Duane Spencer
1235 La Plata Highway, Farmington, NM 87401

G. E/2 Section 14, 320 Acre Federal Lease NM060402A Little Oil & Gas P. O. Box 1258, Farmington, NM 87499-1258

District I PO Box 1980, 11 District II #II South First, District III 1000 Rio Braxos District IV 2040 South Pach	Artesla, N	M 8 AHar N S. NI Pg Fe, NM 87505		OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505 Submit to Appropriate District O State Lease - 4 C Fee Lease - 3 C					vised October 18, 1994. Instructions on back	
Al'I Number					Pool Code ()/() And the Pool Natte					
3004300312			7190	190 WAW Fruitland Sand PC (Gas)						
601 Ginther			her Gas	* Property Name * Well Number						
'OGRID No.					Operator	Operator Name			2	
000778		Amoco Productio						5847		
10 Surface Location										
UL or lat mo.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West li	ne County	
К	1.3	27N	13W		2310	South	1850	West	San Juan	
11 Bottom Hole Location If Different From Surface										
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West lis	ne County	
"Dedicated Acres "Joint or Infill "Consolidation Code "Order No. 160 NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION										
16							I hereby certificate and comp 't Signature Pat Printed Name Sta	I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief I Signature Patty linefele Printed Name Staff Assistant Title 1. 2/8/96 Date		
185 5F 0780 5		5507	8099		APR	1VED 6 1998 U. DIV.	I hereby certify was plotted fro me or under m and correct to Date of Survey Signature and t	that the well la m field notes of y supervision, a the best of my b 7/20/5 Scal of Professio file	59 onal Surveyer:	





dugan production corp.

April 3, 1998

CERTIFIED-RETURN RECEIPT

To: Owners of Leases and Unleased Minerals
Offsetting Dugan Production Corp.'s
Ginther Gas Com No. 2 well
Unit K, Section 13, T-27N, R-13W
San Juan County, NM

Dear Interest Owner (Address list attached):

Dugan Production Corp is making application to the New Mexico Oil Conservation Division and is requesting their administrative approval for the non-standard location of the captioned well which has recently been recompleted from the Basin Dakota to the WAW Fruitland Sand-PC gas pool. Attached for your information and file is a copy of our application. Our records reflect that you are the owner of Fruitland and/or Pictured Cliffs mineral interest in a lease offsetting our Ginther Gas Com No. 2 spacing unit for the WAW Fruitland Sand-PC which comprises the SW/4 of Section 13. Should you be opposed to the NMOCD approving our application, you should provide your objections to the NMOCD at 2040 South Pacheco, Santa Fe, NM 87505, in writing within 20 days from the date of this letter. We would appreciate receiving a copy of any correspondence to the NMOCD.

Should you have questions or need additional information, please let us know at the letterhead address or phone number.

Sincerely,

John D. Roe

Engineering Manager

John O, Roe

JDR/tmf

attachs.

cc: NMOCD - Aztec, Santa Fe

INTEREST OWNERS OF OFFSET LEASES & UNLEASED MINERALS DUGAN PRODUCTION CORP.'S GINTHER GAS COM NO. 2

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E. N/2 Section 24 - 320 Acre Federal Lease NM12033

Conoco Oil

10 Desta Drive, Suite 100W, Midland TX 79705-4500

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