

15375 Memorial Drive Houston Texas 77079 281 584-6000

June 19, 2000

Lori Wrontenbery, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
2040 South Pacheco Street
Santa Fe. New Mexico 87505

Re: Application of Vastar Resources, Inc. for Administrative Approval of an Unorthodox Well Location for its Carracas 2 A Well No. 11, to be located 2,405 feet from the South line and 1,880 feet from the West line of Section 2, Township 31 North, Range 5 West, N.M.P.M., in a non-standard 368.6-acre spacing unit comprising the entirety of Fractional Section 2 necessitated by a variation in the legal subdivision of the U.S. Public Land Surveys, Rio Arriba County, New Mexico

Dear Ms. Wrotenbery:

Vastar Resources, Inc. hereby seeks administrative approval pursuant to the provisions of Rule 8 of the Special Rules and Regulations for the Basin-Fruitland Coal Gas Pool adopted on October 17, 1988, of an unorthodox well location for its 2 A Well No. 11, to be drilled in the Fruitland Coal formation at an unorthodox well location 2,405 feet from the South line and 1,880 feet from the West line of Section 19, Township 32 North, Range 4 West, N.M.P.M., Rio Arriba County, New Mexico. A non-standard 368.6-acre spacing unit comprising the entirety of Fractional Section 2 will be dedicated to the well. This is necessitated by a variation in the legal subdivision of the U.S. Public Land Surveys in Section 2.

The well will be drilled to a depth of approximately 3,230 feet to test the Fruitland Coal formation, Basin-Fruitland Coal Gas Pool.

This location in the Fruitland Coal formation is unorthodox because Rule 7 of the Special Rules and Regulations for the Basin-Fruitland Coal Gas Pool (Order No. R8768, as amended) provides for wells to be located in the NE/4 or SW/4 of a single governmental section and located no closer than 660 feet to any outer boundary of the proration unit nor closer than 10 feet to any interior quarter-quarter section line or subdivision inner boundary.

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Carracas 2 A #11 Well
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This unorthodox location is required by topographic conditions and Carson National Forest requirements. When Vastar field personnel met at the well site with representatives of the Forest Service, the Forest Service requested the well pad be built at end of the existing road and to not extend the road as previously planned across a large drainage wash to gain access to the central portion of the section. This drainage wash is highly eroded with unstable banks as it carries the waters of Orcones Canyon into Bancos Canyon.

Attached hereto as Exhibit A is a topographical map showing no standard location is available for the well on this spacing unit. Attached as Exhibit B and C are the C-102 Plat and the APD as filed with the Aztec District Office reflecting request of approval of a non-standard 368.6-acre Fruitland Coal spacing unit. These exhibits show that the unorthodox location is supported by the surface topography of the area.

Attached hereto as Exhibit D is a plat as required by Rule 104.F(3) showing the subject spacing unit, the proposed unorthodox well location, the offsetting wells and the diagonal and adjoining spacing units. Exhibit F lists parties affected by this application. A copy of this application, including a copy of the plat described above has been sent to these affected parties by certified mail-return receipt requested in accordance with Rule 1206(A)(5) advising them that if they have an objection to this application it must be filed in writing within twenty days from the date this notice was sent.

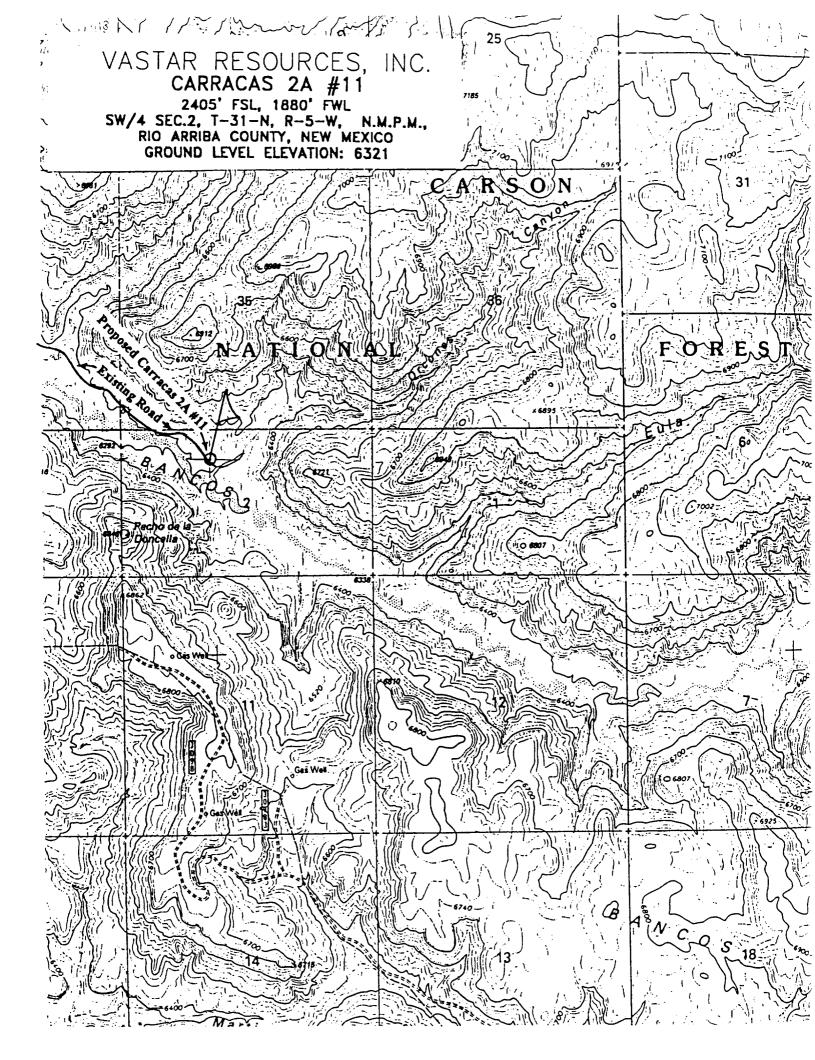
Copy of this request have also been provided to the Aztec Office and the Bureau of Land Management, Farmington District Office.

Very truly yours,

Michael Rodgers, CPL

Direct Line: (281) 584-3230 Fax: (281) 584-6370 E-mail: mrodger@vastar.com

Enclosures



District I
PO Box 1980, Hobbo, NAI 88241-1980
District II
RII South First, Arteria, NM 88210
District III
1000 Rio Benzos Rd., Aztec, NM 87410
District IV

2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505 Form C-102 Revised October 18, 1994 Instructions on back Submit to Appropriate District Office

State Lease - 4 Copies

Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

'All Number	1 Punt Code 71629	Pool Name Basin Fruitland Coal
1 Property Code	¹ l'ruper CARRACA	·
10GRID No. 36619	VASTAR RESOUR	r Name 'Elevation

10 Surface Location

UL or lut no. K	Section 2	Tuwnship 31N	Range 5W	Lot Ida	Feet from the 2405 the second	North/South line SOUTH	Feet from the 1880'		RIO ARRIBA	
Bottom Hole Location If Different From Surface										
UL or lut no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County	1

"Dedicated Acres "Joint or Infill "Consolidation Code "Order No.

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A

To OPERATOR CERTIFICATION I hereby certify that the information contained hereds is true and complete to the best of my hordredge and belief. Signature Charles W. Knight, Jr. Printed Name Engineer Title June 9, 2000 Date 1880' Section 2 11 SURVEYOR CERTIFICATION 11 hereby certify that the well location shown on this plat was plotted from fletd notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. 18 OF OR		NON-STAND	E DIVISION		
Charles W. Knight, Jr. Printed Name Engineer Title June 9, 2000 Date 1880' Section 2 Issurveyor Certification shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. O6/06/00 Date of Survey Signature and Soft Machine, Description of the correct of the best of my belief. Certification for the correct of the best of my belief. O6/06/00 Date of Survey Signature and Soft Machine, Description of the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the best of my belief. Certification for the correct of the correct of the best of my belief.	16				I hereby certify that the information contained herein is
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