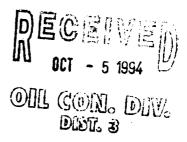


Midland Division
Exploration Production

Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

September 28, 1994

Mr. William LeMay, Director State of New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe. New Mexico 87501



DE.

Application for an Unorthodox Well Location at 1835 FNL and 1875 FEL of Sec. 20, T-30N, R-10W for Completion of Conoco's FC Federal Com No. 9 to the Aztec Pictured Cliffs Gas Pool

Dear Mr. Lemay:

This well was originally drilled as a potential Fruitland Coal well by Mesa Petroleum. Casing was set to TD through the Fruitland Coal, but due to the poor quality of the reservoir encountered by this wellbore it was never perforated for a completion. Conoco, as current operator of this property, is proposing to make an initial completion of this well in the Aztec Pictured Cliffs Gas Pool.

As shown by EXHIBIT A (the C-102 filed for the drilling of this well as a Fruitland Coal completion) the N/2 of Section 20 was communitized initially to form a 320-acre standard proration unit. Within this 320-acre proration unit configuration, the well was located at an orthodox location, being no closer than 790 feet to any outer boundary of the proration unit.

However, standard development for the Aztec Picture Cliffs Gas Pool is on 160-acre spacing. As shown by EXHIBIT B (the C-102 filed for the completion of this wellbore as a Pictured Cliffs producer) this well's location becomes unorthodox in this pool, since it is located only 765 feet from the western boundary of the 160-acre proration unit instead of the prescribed 790 feet.

EXHIBIT C shows (a) the subject FC Federal Com No. 9 wellbore, (b) its required 160-acre proration unit, (c) all Pictured Cliffs completions within a 12-section area, and (d) the offset operators to this spacing unit. This location is only unorthodox by 25 feet to the western boundary of the spacing unit.

This spacing unit is offset by Meridian Oil Inc. on its northern and eastern boundaries and by Amoco Production Company on the southern and western boundaries. Meridian and Amoco have both signed waivers to objection of this unorthodox location, which are attached as EXHIBITS D and E to this application.

It should be noted that EXHIBIT C shows another Pictured Cliffs completion, Conoco's Gage No. 2 well, within the spacing unit of the FC Federal Com No. 9. The Gage No. 2 well is an old open hole, oil-fraced completion that has declined to a 10 MCFGPD rate. Although there should still be additional recoverable reserves under this spacing unit, they will not be recoverable by this existing completion. Because of the poor open hole completion the well cannot be remediated and the remaining reserves are not sufficient to warrant drilling a replacement well. Therefore, the only solution to preventing the waste of these reserves is through the recompletion of the FC Federal Com No. 9 well. When the production of Pictured Cliffs hydrocarbons from the FC Federal Com No. 9 completion is approved, the Gage No. 2 completion will be shut-in and the Pictured Cliffs completion in that well will be plugged and abandoned.

It is also obvious that since the original 320-acre communitization for a Fruitland Coal completion is no longer valid the FC Federal Com No. 9 will need to be renamed. When it is approved for Pictured Cliffs production and the Gage No. 2 well is shut-in, an application will be submitted for the subject well of this application to be renamed as the Gage No. 2R, the proper designation for a replacement well for the Gage No. 2.

Since the amount of encroachment, which occurs only on the western boundary, is very small and the remaining Pictured Cliffs reserves cannot be recovered by the current completion, it is requested that this unorthodox location for an Aztec Pictured Cliffs completion be approved. Approval of this application will not significantly impair correlative rights and will promote the prevention of waste by allowing the economic recovery of Pictured Cliffs reserves that will otherwise be lost.

If there are any questions concerning this application please contact Jerry W. Hoover at (915) 686-6548.

Very truly yours,

Jerry W. Hoover

Sr. Conservation Coordinator

State of New Mexico Energy, Minerals and Natural Resources Department

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EXHIBIT A

DESTRICT!

OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, New Mexico 87504-2068

DISTRICT B

DISTRICT III 1000 Rio Brisos Rd., Asiac, NM 87410 WELL LOCATION AND ACREAGE DEDICATION PLAT

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State of New Mexico Energy, Minerals & Natural Resources Department

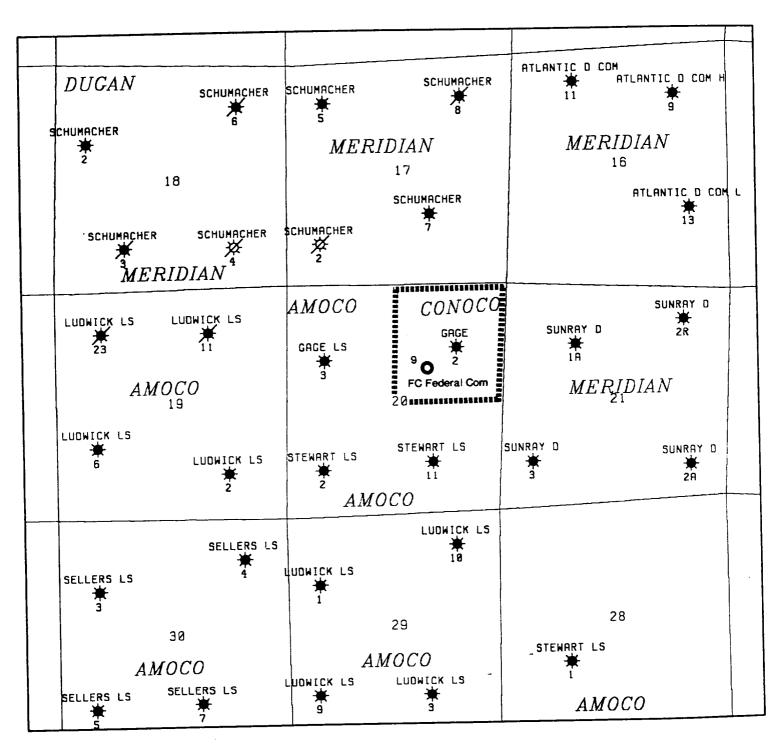
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-10
Revised February 21, 199
Instructions on bac
Submit to Appropriate District Offic
State Lease - 4 Copic

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Certificate Number

AZTEC PICTURED CLIFFS COMPLETIONS



160-Acre PC Spacing Unit

WAIVER TO OBJECTION

Application of Conoco inc. for Unorthodox Gas Well Location for Completion of its FC Federal Com No. 9, located at 1835 FNL and 1875 FEL of Section 20, T-30N, R-10W to the Aztec Pictured Cliffs Gas Pool

We, the undersigned, as an offset operator to the northern and eastern boundaries of the 160-acre spacing unit required for Conoco's completion of its FC Federal Com No. 9 at an unorthodox location in the Aztec Pictured Cliffs Gas Pool, waive any objection to the above described application.

Company Name: Meridian Oil Inc.

Signature:

Title:

Date:

Septenter 28, 1994

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Company Name: Amoco Production Company

Signature:

Title:

Date:

Z 111 D16 D99



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail

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