

BURLINGTON RESOURCES

SAN JUAN DIVISION

July 31, 1998

New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

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OIL CON. DIV.
DIST. 3

Att: Mr. Roy Johnson

Dear Mr. Johnson:

This is an application for variance to Rule 107 Section J. We intend to workover and drill additional hole in the following wells in the Pictured Cliffs formation, run 3 1/2" casing and cement, and run no tubing.

Pipkin #4	NE Section 18, T-27-N, R-10-W	30-045-06556
Huerfano Unit #49	NE Section 35, T-27-N, R-9-W	30-045-06155
Huerfano Unit #25	SE Section 4, T-26-N, R-9-W	30-045-05998
Huerfano Unit #24	SW Section 4, T-26-N, R-9-W	30-045-06030
Huerfano Unit #47	NE Section 9, T-26-N, R-9-W	30-045-05971
McConnell #2	SE Section 13, T-26-N, R-9-W	30-045-05816
McConnell #3	NE Section 13, T-26-N, R-9-W	30-045-05854

In addition, we intend to workover the following Pictured Cliffs wells which currently have 3 1/2" casing. We will stimulate and fracture treat these wells, and will run no tubing back in the wells.

Summit B #5	✓ NW Section 33, T-29-N, R-11-W	30-045-60273
Whitley #1	NW Section 17, T-27-N, R-9-W	30-045-06531
Aztec #6	SE Section 14, T-28-N, R-11-W	30-045-07393
Mangum #3	SE Section 28, T-29-N, R-11-W	30-045-07810
Atlantic C #8	NE Section 31, T-31-N, R-10-W	30-045-20137
Florance #8	NW Section 20, T-30-N, R-9-W	30-045-20462
Pierce #9	NW Section 7, T-30-N, R-9-W	30-045-20475
Sunray B #7	SW Section 15, T-30-N, R-10-W	30-045-20846
Sunray A #5	SE Section 10, T-30-N, R-10-W	30-045-20894
Summit #7	SE Section 34, T-29-N, R-11-W	30-045-21530

These tubingless completions are desirable as they allow Burlington to economically produce reserves from the tight, low pressure Pictured Cliffs formation. Significant cost savings are realized using this method. The 3 1/2" casing string will allow the wells to produce at a higher rate than can be realized through smaller tubulars, and also carry less risk during any subsequent workover operations.

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New Mexico Oil Conservation Division
Page Two
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All the listed wells meet the following criteria:

- are in proven fields
- are less than 5000' total depth
- do not have corrosive or pressure problems
- are not dual completions
- will not produce any liquids or condensate (dry gas only)

Attached is a pertinent data sheet and wellbore schematic for each well. Please let me know if you require any additional information for these wells.

Sincerely,

BURLINGTON RESOURCES



Peggy Bradfield
Regulatory/Compliance Administrator

xc: NMOCD - Aztec District Office