

DATE IN 11/9/00	SUSPENSE 11/29/00	ENGINEER MS	LOGGED MW	TYPE NSP
-----------------	-------------------	-------------	-----------	----------

ABOVE THIS LINE FOR DIVISION USE ONLY

31847046

NEW MEXICO OIL CONSERVATION DIVISION
- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

Application Acronyms:

- [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location]
- [DD-Directional Drilling] [SD-Simultaneous Dedication]
- [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
- [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
- [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
- [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
- [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

OIL CONSERVATION DIV
 NOV - 9 PM 11:47

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Directional Drilling
 NSL NSP DD SD

Check One Only for [B] and [C]

- [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

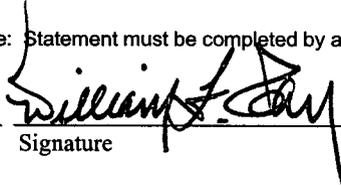
[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

- [A] Working, Royalty or Overriding Royalty Interest Owners
- [B] Offset Operators, Leaseholders or Surface Owner
- [C] Application is One Which Requires Published Legal Notice
- [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] Waivers are Attached

[3] **INFORMATION / DATA SUBMITTED IS COMPLETE** - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

William F. Carr  Attorney 11/8/00
 Print or Type Name Signature Title Date

**CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS**

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
MICHAEL H. FELDEWERT
TANYA M. TRUJILLO
ROBERT J. SUTPHIN, JR.

JACK M. CAMPBELL
1916-1999

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
FACSIMILE: (505) 983-6043
E-MAIL: law@westofpecos.com

November 8, 2000

HAND-DELIVERED

Ms. Lori Wrotenbery, 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 Marbob Energy Corporation for Administrative Approval of a Non-Standard Gas Spacing Unit for its Trapper "13" State Com Well No. 1, comprised of the N/2 of Section 13, Township 19 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.*

Dear Ms. Wrotenbery:

Marbob Energy Corporation hereby seeks administrative approval pursuant to the provisions of Division Rule 104 D (2)(b)-(d) adopted on January 18, 1996, of a non-standard gas spacing and proration unit in the Morrow formation, Lusk-Morrow Gas Pool for its Trapper "13" State Com Well No. 1 to be comprised of 320 acres in the N/2 of Section 13, Township 19 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

The Lusk-Morrow Gas Pool is governed by Special Pool Rules and Regulations which were adopted by Division Order No. R-2373, as amended by Division Orders Nos. R-2373-A and R-2373-B and provide for 640-acre spacing and proration units. These rules were subsequently amended to provide for infill development of the pool with no more than one well to each single governmental quarter section by Division Order No. R-2373-D.

Lori Wrotenbery, Director
Oil Conservation Division
November 7, 2000
Page 2

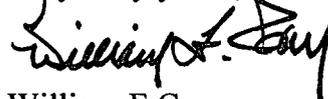
This non-standard gas spacing and proration unit in the N/2 of Section 13 is necessary because the S/2 of the section consists of a non-standard 320-acre unit which has been dedicated in the Morrow formation, Lusk-Morrow Gas Pool, to the H. J. "13" Federal Com Well No. 1 located 1980 feet from the South line and 2310 feet from the West line of said Section 13. The S/2 has been dedicated to this well since the time the well was drilled by Tenneco Oil Company in 1981. *See*, Exhibit A attached hereto. Accordingly, the only remaining acreage available for a well in this Section is the 320-acres which is the subject of this application.

Marbob has searched its records, the records of Lynx Petroleum Consultants (the current operator of the well), and the records of the Oil Conservation Division and has been unable to find evidence of Division approval of the 320-acre non-standard unit comprised of the S/2 of said Section 13. The Lynx Petroleum Consultants, Inc. H. J. "13" Federal Com Well No. 1 located in the S/2 of said Section 13 has been producing from this acreage for approximately 20 years and the owners in the S/2 of this section have shared the costs of developing this acreage and the benefits of the production from this well.

As you will note from the attached plat, (Exhibit B) this non-standard spacing and proration unit is comprised of contiguous quarter-quarter sections and lies wholly within a single governmental half section. This plat also shows the subject spacing unit for this well and the applicable standard spacing and proration unit for this pool, and all adjoining spacing units. Also attached (Exhibit C) is a list of the parties affected by this application as defined by Division Rule 1207.A(2). Each of the owners of interest in the mineral estate to be excluded from the non-standard spacing and proration unit have executed a waiver of objection to this application. Copies of these waiver letters are attached as Exhibit D.

Marbob Energy Corporation therefore seeks approval of a non-standard gas spacing and proration unit comprised of the N/2 of Section 13, Township 19 South, Range 31 East, NMPM, Eddy County, New Mexico and confirmation of the 320-acre non-standard spacing and proration unit operated by Lynx Petroleum Consultants in the S/2 of this section.

Very truly yours,



William F. Carr

Attorney for Marbob Energy Corporation

Lori Wrotenbery, Director
Oil Conservation Division
November 7, 2000
Page 3

cc: Raye Miller
Marbob Energy Corporation
Post Office Box 227
Artesia, New Mexico 88211-0227

**NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT**

Form No. 1
Revised 1978
Copyright © 1978

All distances must be from the outer boundaries of the Section

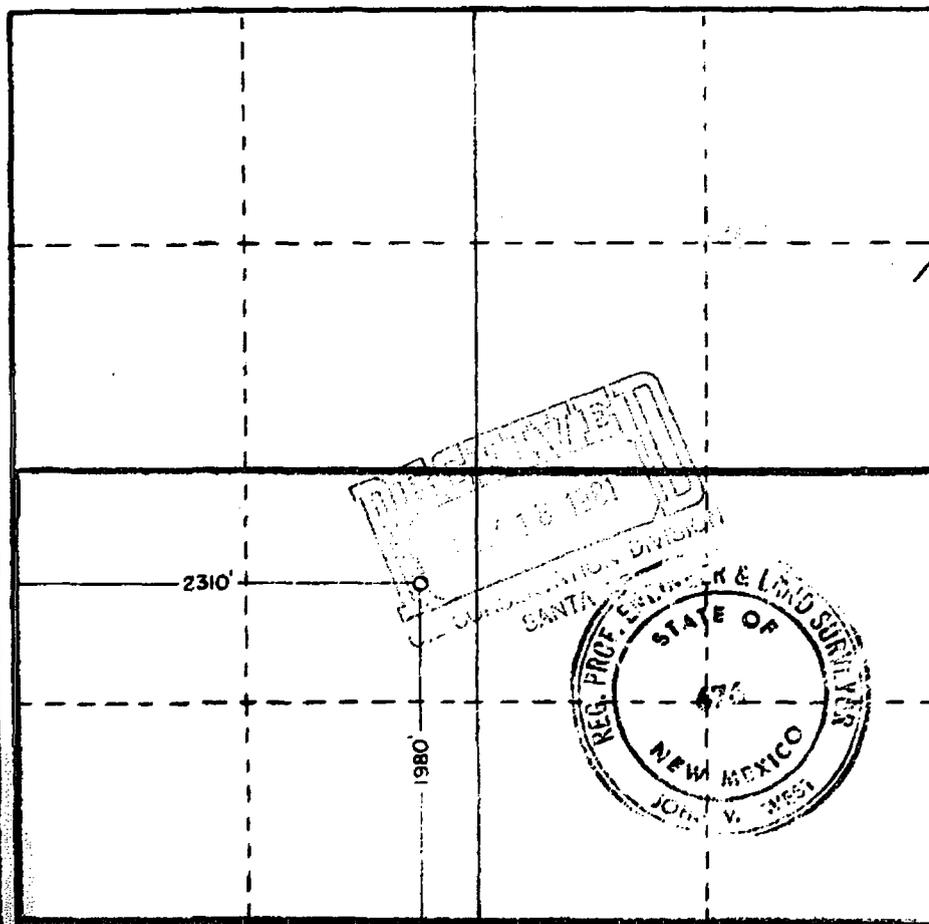
Tenneco Oil Co.		Lease "13 13 F&J Com."		1
Letter K	Section 13	Township 19South	Range 31East	Eddy
Actual Footage Location of Well:				
1980	feet from the South	line and	2310	feet from the West
Ground Level Elev. 3557.9'	Producing Formation Morrow	Pool Lusk Morrow	Reservoir Acreage 320	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

Yes No If answer is "yes," type of consolidation _____

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



CERTIFICATION

I hereby certify that the information obtained herein is true and complete to the best of my knowledge and belief.

John W. Wess
Name

Moss Bannerman

Position

Division Drilling Engineer

Company

Tenneco Oil Company

Date

April 29, 1981

I hereby certify that the well location 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 knowledge and belief.

Date Surveyed

April 8, 1981

Registered Professional Engineer and/or Land Surveyor

John W. Wess

Certificate No. **JOHN W. WESS 678**
PATRICK A. ROMERO 6883
Ronald J. Eideen 3239

EXHIBIT

A

tabbies

EXHIBIT C

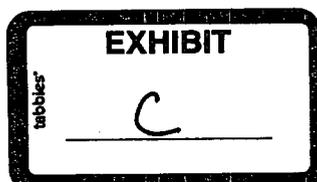
AFFECTED PARTIES

Application of Marbob Energy Corporation
administrative approval of a non-standard spacing or proration unit
Trapper "13" State Com Well No. 1
320 acres (North Half)
Section 13, Township 19 South, Range 31 East, NMPM
Eddy County, New Mexico.

Lynx Petroleum Consultants, Inc.
Post Office Box 1708
Hobbs, New Mexico 88241

Bureau of Land Management
2909 West 2nd Street
Roswell, New Mexico 88201

Attention: David Glass



CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
MICHAEL H. FELDEWERT
TANYA M. TRUJILLO
ROBERT J. SUTPHIN, JR.

JACK M. CAMPBELL
1916-1999

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
FACSIMILE: (505) 983-6043
E-MAIL: law@westofpecos.com

November 7, 2000

BY FACSIMILE AND U. S. MAIL

FAX NO. (505) 627-0207

Bureau of Land Management
2909 West 2nd Street
Roswell, New Mexico 88201

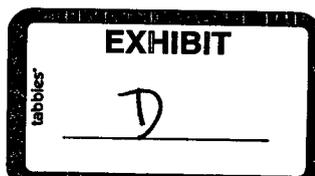
Attention: David Glass

Re: *Application of Marbob Energy Corporation for administrative approval of a 320-acre non-standard spacing or proration unit for its Trapper "13" State Com Well No. 1 in the Morrow formation, Lusk-Morrow Gas Pool, in the N/2 of Section 13, Township 19 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.*

Gentlemen:

Enclosed is a copy of the above-referenced application which will be filed with Oil Conservation Division by Marbob Energy Corporation seeking administrative approval of a non-standard gas spacing and proration unit for its Trapper "13" State Com Well No. 1 in the Morrow formation, Lusk-Morrow Gas Pool, comprised of 320 acres (north half) of Section 13, Township 19 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

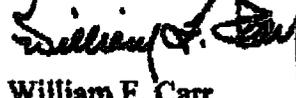
As the owner of an interest in the mineral estate which will be affected by the proposed non-standard unit, you may object to this application. Objections must be filed in writing at the Division's Santa Fe office within twenty days from the date this notice was sent to you. If no objection is received within twenty days after the Division Director receives this application, the non-standard spacing or proration unit may be approved.



Notification Letter
November 7, 2000
Page 2

Marbob Energy Corporation requests that you waive objection to this application by signing the copy of this letter on the line provided and returning it to our attorneys in the enclosed envelope. Your attention to this request is appreciated.

Very truly yours,



William F. Carr
Attorney for Marbob Energy Corporation

We hereby waive objection to the application of Marbob Energy Corporation for administrative approval of a non-standard spacing and proration unit comprised of the north half of Section 13, Township 19 South, Range 31 East, NMPM, Eddy County, New Mexico.

David R. Glass
Signature

David R. Glass
Printed Name

Petroleum Engineer
Title

NOV 08 2000
Bureau of Land Management

Enclosures

cc: Mr. Raye Miller
Marbob Energy Corporation
Post Office Box 227
Artesia, New Mexico 88211-0227