Southern U.S. Business Unit Domestic Production $S_{US_1} = 12 - 6 - 2009$ $S_{US_1} = 12 - 27 - 2009$ $F^{MESO} = 4/36 - 236 - 639$



P.O. Box 3487 Houston, TX 77253-3487 Telephone 713/629-6600

DEC 0 6 2004

December 3, 2004

OIL CONSERVATION DIVISION

Request for Administrative Approval Of Unorthodox Oil Well Location

Mr. Michael E. Stogner New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Marathon Oil Company respectfully requests administrative approval of an unorthodox oil well location for the following well:

Dayton Hardy #5

1,800' FSL & 1,500' FEL, NW/4 OF SE/4 Section 20, T21S, R37E, Unit Letter J Lea County, New Mexico

The proposed well will be as an infill producer in the Penrose Skelly; Grayburg Pool, which is an oil pool spaced on 40 acres. This well is a follow-up to recent similar infill drilling by Apache Corporation and ChevronTexaco in the same Pool in Section 20. Marathon Oil Company supports their contention that typical Grayburg wells cannot drain 40 acres.

This application is based on geological and engineering analysis. That analysis and justification for this request is attached as Exhibit 1, along with other supporting documentation.

A land plat highlighting the proposed well's location is attached as Exhibit 2. The N/2 of SE/4 of Section 20 is covered by a single fee lease and has common royalty and working interest ownership. For that reason and the proposed location of the infill well, there are no adversely affected interest owners and no other party has been notified of this application.

Marathon Oil Company was planning to drill the proposed well at the legal location of 1,650' FSL and 1,650' FEL but had to move the proposed location to 1,800' FSL and 1,500' FEL to stay away from an existing pipeline.

December 3, 2004 Page 2

If you have any questions concerning this application or need additional information, please contact me by telephone at (713) 296-2224 or by e-mail at <u>bdlockhart@marathonoil.com</u>. Thank you for your consideration of this matter.

Sincerely,

Brent Lockhart Reservoir Engineer

Attachments

cc: NMOCD District 1 – Hobbs, NM Well File

EXHIBIT 1

ENGINEERING AND GEOLOGICAL JUSTIFICATION

Application Of Marathon Oil Company For Administrative Approval Of An Unorthodox Oil Well Location:

Dayton Hardy #5

1,800' FSL & 1,500' FEL Section 20, T21S, R37E, Unit Letter J Lea County, New Mexico

PRIMARY OBJECTIVE: GRAYBURG

SUPPORTING DATA:

- 1. Marathon Oil Company is the operator of the proposed Dayton Hardy #5 well (Exhibit 3). The proposed total depth is 4,600'.
- 2. The completion will be in the Penrose Skelly; Grayburg Oil Pool. The following is a list of all other current and proposed wells on the Dayton Hardy Lease:

Operator	Well	Location	Formation	Status
Marathon	Dayton Hardy #1	20-I	Grayburg	Producer
Marathon	Dayton Hardy #4	20-J	Grayburg	Proposed New Drill
Marathon	Dayton Hardy #6	20-I	Grayburg	Proposed New Drill
Marathon	Dayton Hardy #7	20-1	Grayburg	Proposed New Drill

- 3. The proposed Dayton Hardy #5 unorthodox Grayburg location is based on the need to stay clear of an existing pipeline and drainage considerations:
 - a. Grayburg Reservoir

The Grayburg is a series of alternating subtidal and supratidal dolomites, with the subtidal rock having porosity and hydrocarbons and the supratidal rock being tight. The Grayburg depositional environments varied rapidly so that many porous and tights intervals are not continuous from well-to-well on 40-acre spacing. Tight dolomite and/or anhydrite intervals within the Grayburg create vertical and horizontal flow barriers between different zones of porosity. Additionally, average porosity of the Grayburg is less than 10%, and average permeability is less than 1 millidarcy. For all of these reasons, Grayburg wells are not usually capable of draining a 40-acre proration unit.

b. Drainage Area

As previously demonstrated by Apache Corporation and ChevronTexaco, the drainage area of a typical Grayburg completion usually range from 10 to 20 acres.

- 4. The N/2 of SE/4 of Section 20 is covered by a single fee lease which has common royalty and working interest ownership. Marathon is the operator and 100% working interest owner of the Grayburg wells toward which the proposed well will encroach. Therefore, there are no offset interest owners or adversely affected parties to notify of this application.
- 5. Approval of this application will allow for the recovery of oil and gas reserves which would not otherwise be recovered.

NOTIFICATION LIST

Application Of Marathon Oil Company For Administrative Approval Of An Unorthodox Oil Well Location

Dayton Hardy #5 1,800' FSL & 1,500' FEL Section 20, T21S, R37E, Unit Letter J Lea County, New Mexico

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Offset Operators, Working Interest Owners, N/2 of SE/4 Section 20:

 Marathon Oil Company P. O. Box 3487 Houston, TX 77253-3487 Operator/100% WI

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DISTRICT I 1625 N. PRENCH DR., E	iobbs, nm 88	240					Resources Department			orm C-10 JNE 10, 200	
DISTRICT II 1301 W. GRAND AVENUE DISTRICT III	OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DR. Santa Fe, New Mexico 87505 New Mexico 100 State Lease - 4 Copie State Lease - 3 Copie										
1000 Rio Brazos Ro DISTRICT IV			WELL LO	CATION	AND	ACREA	GE DEDICATI	ON PLAT	🗆 AMENDI		
1220 S. ST. PRANCIS DI	R., SANTA FE.	NM 87505		Pool Code				Pool Name		LD REPOR	
				0350			Penrose Sk	elly (Grayb	urg)		
Property C	ode	Γ	Property Name						Well Number		
006399			DAYTON HARDY						5		
OGRID No. 14021				^{Operator Name} MARATHON OIL COMPANY					Elevation 3491'		
					Surfa	ce Loca	ation				
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State of New Mexico

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary	RECEIVED	Mark E. Fesmire, P.E. Director Oil Conservation Division
Oil Conservation Division 1220 S Francis Dr Santa Fe, NM 87505 RE: Proposed; MC DHC NSL NSP SWD WFX PMX	DEC 17 2004 Oil Conservation Division 3220 S. Saint Francis Drive State For NBA 87505	
Gentlemen: I have examined the application is <u>Marathon Bill</u> Operator And my recommendations are as	Lease & Well No. Unit-S-T-R	20-215-37e API#
- OKKZ		· · ·
Yours very truly,		· · · · · · · · · · · · · · · · · · ·
Chris Williams Supervisor, District I	19 And	
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