April 5, 2000

Telefax No. (915) 686-5558

Conoco, Inc. 10 Desta Drive – Suite 100W Midland, Texas 79705-4500 Attention: Kay Maddox

Administrative Order NSL-4429

Dear Ms. Maddox:

Reference is made to the following: (i) your original application submitted to the New Mexico Oil Conservation Division ("Division") on March 29, 2000; (ii) the Division's initial response by letter on the same day from Mr. Michael E. Stogner, Engineer/Chief Hearing Officer in Santa Fe withdrawing this application; (iii) your re-submittal of this application to the Division on April 5, 2000; (iv) your telephone conversations with Mr. Stogner on Tuesday, April 4, 2000 and Wednesday, Aril 5, 2000; and (v) the Division's records in Santa Fe, including the file in Case No. 12182: all concerning Conoco, Inc.'s request for an exception to Rule 4 of the "*Temporary Special Pool Rules for the North Hardy-Strawn Pool*," as promulgated by Division Order No. R-11221, issued in Case No. 12182 dated July 12, 1999, in order to drill the proposed Meyer "B-31" Well No. 5 (API No. 30-025-34960) at an unorthodox oil well location 2310 feet from the South line (which is 50% closer to the north line of this well's proposed unit then allowed) and 1850 feet from the West line (Unit K) of Section 31, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico.

Lots 3 and 4 and the E/2 SW/4 (SW/4 equivalent) of Section 31, being a standard 160.10acre oil spacing and proration unit within the governing limits of the North Hardy-Strawn Pool, is to be dedicated to this well.

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The subject application has been duly filed under the provisions of Division Rule 104.F and the applicable provisions of the rules governing this pool.

It is our understanding that Conoco, Inc. is seeking this location exception based on a 3-D seismic survey of the immediate area and by well control from resent drilling activity, which indicates that a well drilled at this location will be at a more favorable geologic position within the Undesignated North Hardy-Strawn Pool underlying the subject 160.10-acre unit.

By the authority granted me under the provisions of: (i) Rule 5 of these special pool rules;

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and (ii) Division Rule 104.F (2), the unorthodox oil well location of the proposed Meyer "B-31" Well No. 5 is hereby approved.

Sincerely,

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Lori Wrotenbery Director

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cc: New Mexico Oil Conservation Division - Hobbs
U. S. Bureau of Land Management - Carlsbad
File: Case No. 12182
W. Thomas Kellahin, Legal Counsel for Conoco, Inc. - Santa Fe