



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

June 26, 2000

Lori Wrotenberg

Director

Oil Conservation Division

**Bonneville Fuels Corporation
1660 Lincoln - Suite 2200
Denver, Colorado 80264
Attention: Bob Schwering**

Telefax No. (303) 863-1558

Administrative Order NSL-4474(NSBHL)

Dear Mr. Schwering:

Reference is made to the following: (i) your initial application dated May 10, 2000; and (ii) the records of the New Mexico Oil Conservation Division in Santa Fe ("Division"), including the file on Division Administrative Order NSL-4425 (NSBHL): all concerning Bonneville Fuels Corporation's request for exception to Division Rules 111.A (13) and 111.C (2).

The Division Director Finds That:

- (1) The subject application has been duly filed under the provisions of Division Rules 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999, and 111.C(2);
- (2) By Order No. R-8954 issued in Case No. 9684, dated May 31, 1989 and made effective June 1, 1989, the Division created and defined the Foster Draw-Delaware Gas Pool for the production of gas from the Delaware Mountain Group. The horizontal limits for this pool, as currently designated, include the following lands in Eddy County, New Mexico:

TOWNSHIP 21 SOUTH, RANGE 26 EAST, NMPM

Irregular Section 1: Lots 25, 26, 31, 32, 33, 34, 39, and 40

TOWNSHIP 21 SOUTH, RANGE 27 EAST, NMPM

Section 5: SE/4

Section 6: S/2

Section 8: NW/4;

- (3) The Foster Draw-Delaware Gas Pool is currently governed under Division Rule 104.C (3), which provides for 160-acre gas spacing and proration units and requires wells be located no closer than 660 feet to any outer boundary of such unit and no closer than 10 feet to any quarter-quarter section or subdivision inner boundary;

- (4) The "project area" proposed by Bonneville is to consist of a single standard 163.20-acre gas spacing and proration unit comprising Lots 35, 36, 37, and 38 of Irregular Section 1;
- (5) It is our understanding that Bonneville intends to drill its proposed Avalon "1" Federal Well No. 3 from a surface location 2762 feet from the South line and 2075 feet from the East line of irregular Section 1, drill vertically to an approximate depth of 1,300 feet, kick-off in a west-southeasterly direction, build up to a maximum angle of 50 degrees, and directionally drill to a total depth of approximately 3,830 feet (TVD), or 4,662 feet (MD), at an approximated target point 1900 feet from the South and West lines (Lot 35/Unit S) of irregular Section 1;
- (6) The "penetration point", as defined by Division Rule 111.A (6), is expected to be encountered at a depth of 2,360 feet (TVD) and at a target point, considered to be unorthodox, 2274 feet from the South line and 2583 feet from the West line of Irregular Section 1;
- (7) Further, it is Bonneville's intent to only complete this well and produce gas from perforations within that portion of the wellbore that meet the orthodox setback requirements for the Foster-Delaware Gas Pool, thereby necessitating the need for an exception to Division Rule 111.C (2);
- (8) It appears that the applicant has satisfied all of the appropriate requirements prescribed in Division Rules 111.C (2) and 104.F; therefore, the subject application should be approved and a modified producing area that meet the orthodox setback requirements for the Foster-Delaware Gas Pool that is applicable to the actual pay section encountered within this wellbore should be established based on Bonneville's proposed directional drilling plan; and
- (9) The provisions contained within this order and all other applicable provisions of Division Rule 111 should govern the subject 163.20-acre project area.

It Is Therefore Ordered That:

(1) By the authority granted me under the provisions of Division Rule 104.F (2), the above-described application of Bonneville Fuels Corporation ("Bonneville") for exception to Division Rules 111.A (13) and 111.C (2) for its proposed Avalon "1" Federal Well No. 3 to be drilled from a surface location 2762 feet from the South line and 2075 feet from the East line of

Irregular Section 1, Township 21 South, Range 26 East, NMPM, Eddy County, New Mexico to targeted bottomhole location at an approximate depth of 3,830 feet (TVD), or 4,662 feet (MD), 1900 feet from the South and West lines (Lot 35/Unit S) of irregular Section 1, is hereby approved.

(2) Lots 35, 36, 37, and 38 of Irregular Section 1, being a standard 163.20-acre gas spacing and proration unit/project area for the Undesignated Foster Draw-Delaware Gas Pool, is to be dedicated to this well.

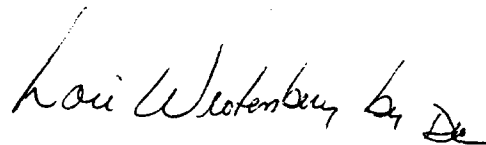
(3) The applicable drilling window or modified producing area that meet the orthodox setback requirements for the Foster-Delaware Gas Pool shall apply only to the completion or perforated interval within this pool of Bonneville's proposed Avalon "1" Federal Well No. 3.

(4) The operator shall comply with all applicable requirements and conditions set forth in Division Rule 111.

(5) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY
Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Artesia
U. S. Bureau of Land Management - Carlsbad
U. S. Bureau of Land Management - Roswell
File: NSL-4425 (NSBHL)