

## NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

November 4, 1999

Conoco, Inc. P. O. Box 2197 – DU3066 Houston, Texas 77252

Attention: Yolanda Perez

Re: Two administrative applications of Conoco, Inc. both dated October 28, 1999 for unorthodox gas well locations within the Basin-Dakota Pool in Sections 10 and 11, Township 28 North, Range 7 West, NMPM, Rio Arriba County, New Mexico.

Dear Ms. Perez:

Per our voice mail conversations this week, I am returning the subject applications for re-submittal when complete.

Thank you for your cooperation in this matter.

Sincereb

Michael E. Stogner Chief Hearing Officer/Engineer

cc:

New Mexico Oil Conservation Division - Aztec W. Thomas Kellahin, Legal Counsel for Conoco, Inc. - Santa Fe Kathy Valdes, NMOCD - Santa Fe

11/18/99



Conoco Inc. P.O. Box 2197 – DU3066 Houston, TX 77252 (281) 293-1613

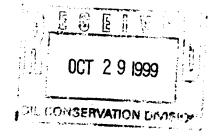
Yolanda Perez Regulatory Analyst EPNA - Gulf Region Lobo/San Juan Asset Unit

October 28, 1999

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

Attn: Michael Stogner

Re: Application for Non-Standard Location Basin Dakota Pool San Juan 28-7 Unit #247M 300' FSL & 1515' FEL Unit Ltr. O, Section 11-T28N-R7W Rio Arriba County, New Mexico



Dear Mr. Stogner,

Conoco Inc. plans to drill the above referenced well in 2000. The proposed well has been staked at a nonstandard location of 300' from the South line and 1515' from the East line, Sec.11, T-28N, R-7W, Rio Arriba County as shown on the attached C-102. Basin-Dakota pool rules require a standard location to be located no closer than 790 feet to any outer boundary of the quarter section on which the well is located. The subject location is an open, 160-acre Dakota infill site. In an effort to prevent waste and to effectively / efficiently develop the 28-7 Unit to its fullest potential, Conoco selected this location to serve two purposes. To accommodate both a primary, 160-acre Dakota infill and an 80-acre Mesaverde infill withdrawal point. The subject location was selected, in part, because of need to locate the proposed Mesaverde completion in a different quarter/quarter Section than the existing Mesaverde well (per Order No. R-10987-A), and the desire to maximize distance from same. Location selection was also limited by topographic constraints, with the east-west trending, Delgadita Canyon running through the south half of Section 11. The drill site is situated near the east end of the canyon, with steep topographic rises to the north and south (see attached topography map).

The ability to access both horizons in a single wellbore will reduce development costs and surface disturbance. Please note that the location is interior to the 28-7 Unit, and does not encroach on any exterior Unit boundaries. An application to downhole commingle production from the Blanco Mesaverde and Basin Dakota pools has been approved (DHC-2444, issued 8/31/99).

Conoco respectfully requests that a non-standard location for the Basin Dakota be issued for the referenced well for the reasons cited above. The subject location is standard for the Blanco Mesaverde Pool (interior to 28-7 Unit, 300' from south line of Section).

If there are any questions concerning this application, please feel free to call me at (281) 293-1613.

Sincerely,

CONOCO INC.

yolanda Perez

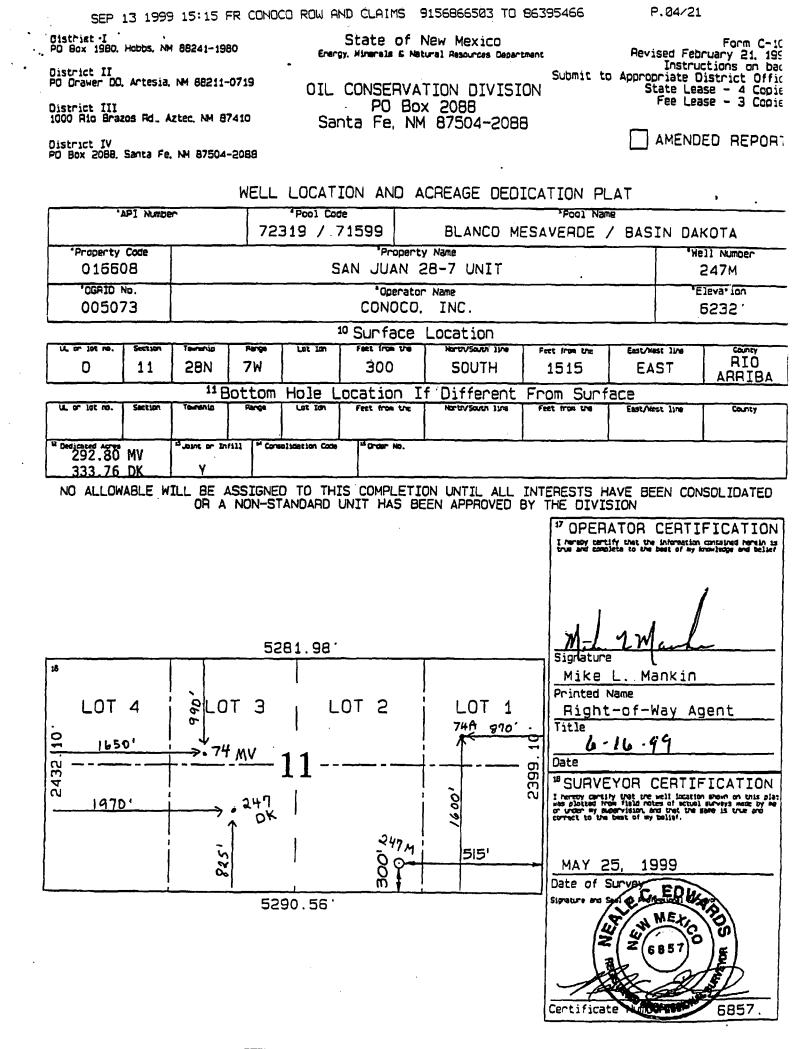
Yolanda Perez Regulatory Analyst Lobo/San Juan Asset

## **OFFSET OPERATORS NOTIFIED**

Burlington Resources P. O. Box 4289 Farmington, NM 87499-4289

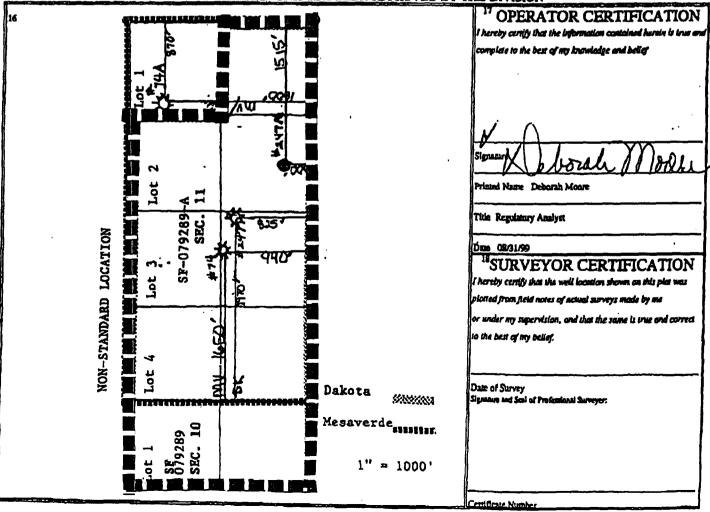
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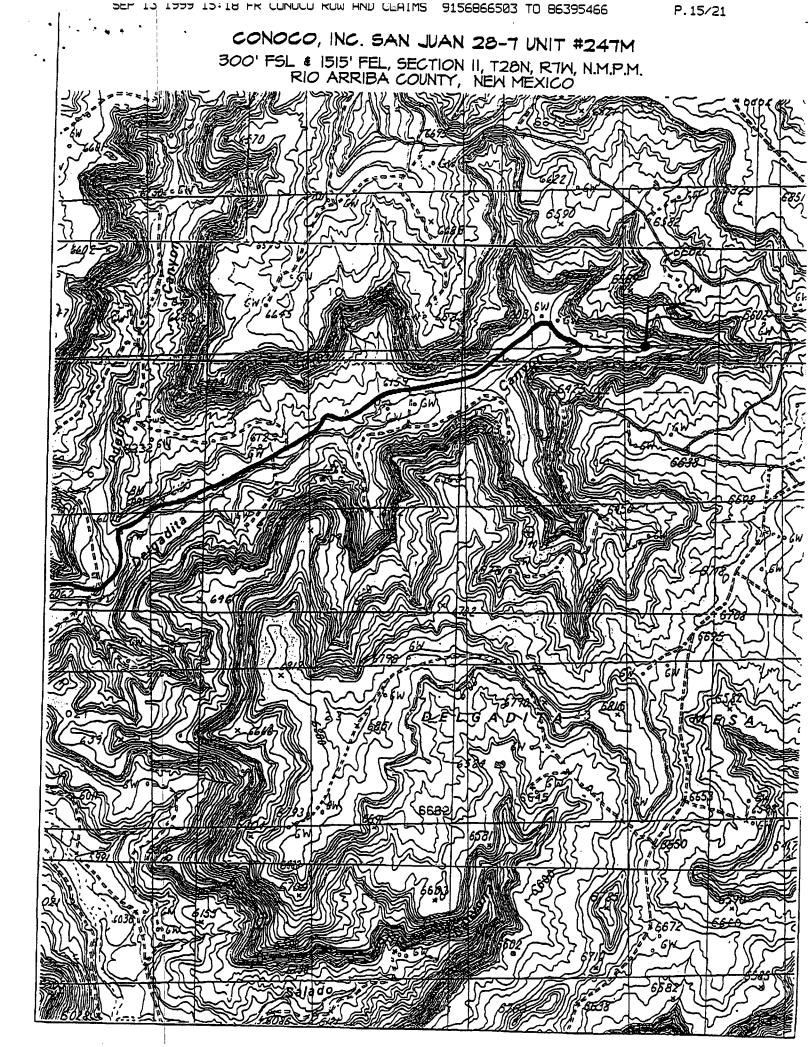
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District I 1675 N. French T	Dr. Hobbs	NN 88240						Desides			
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## NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION





## SAN JUAN 28-7

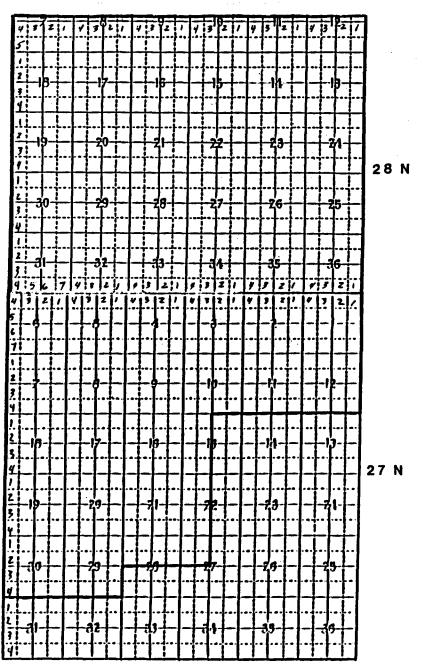
RIO ARRIBA COUNTY NEW MEXICO

No. 14-08-001-459

EFFECTIVE 1-29-53

petroleum engineering and government regulation consultants

gulram, inc.



7 W

11-1-99 called Ms. Perez for a map of the 28-7 Clairs and for a federance to all existing NGLANSP Dadors within These Units. 11-3-99 left a 2 ad voir mail mener for Volunta. 11-4-99 Will return Courses requerta John a repart Marting accurd 11-9-99