NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

July 21, 1999

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

Administrative Order NSL-4333

Dear Ms. Maddox:

Reference is made to the following: (i) your application dated July 20, 1999; and (ii) the records of the New Mexico Oil Conservation Division ("Division"), 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 SEMU Well No. 135 at an unorthodox oil well location 1330 feet from the South line and 1980 feet from the East line (Unit J) of Section 25, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico.

The SW/4 of Section 25, being a standard 160-acre oil spacing and proration unit within the governing limits of the North Hardy-Strawn Pool, is to be dedicated to this well.

It is our understanding that Conoco, Inc. is seeking this location exception based on a 3-D seismic survey of the immediate area, whereby it contends 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-acre unit.

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.

By the authority granted me under the provisions of: (i) Rule 5 of these special pool rules; and (ii) Division Rule 104.F(2), the unorthodox oil well location of the proposed SEMU Well No. 135 is hereby approved.

Mes for DR

Sincerely,

Lori Wrotenbery

Director

LW/MES/kv

cc:

New Mexico Oil Conservation Division - Hobbs

U. S. Bureau of Land Management - Carlsbad

File: Cas

Case No. 12182