

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication
 NSL NSP SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

[D] Other: Specify _____

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

- [A] Working, Royalty or Overriding Royalty Interest Owners
 [B] Offset Operators, Leaseholders or Surface Owner
 [C] Application is One Which Requires Published Legal Notice
 [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
 [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
 [F] Waivers are Attached

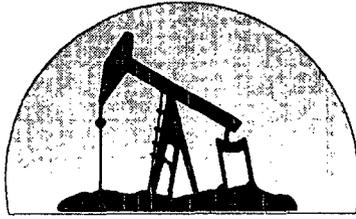
[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name _____ Signature _____ Title _____ Date _____

 e-mail Address



marbob
energy corporation

January 16, 2006

New Mexico Oil Conservation Division
1220 St. Francis Drive
Santa Fe, New Mexico 87504

Attention: Mr. Michael Stogner
Petroleum Engineer

Re: Unorthodox Location
Administrative Approval Request
Dodd Federal Unit #501
2410' FSL & 280' FEL
Section 22 T-17S R-29E
Eddy County, New Mexico

RECEIVED
JAN 19 2006
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Dear Mike:

Marbob Energy Corporation respectfully requests administrative approval for an unorthodox location of the Dodd Federal Unit #501 well as referenced above. Attached is an OCD Form C-102 showing the proposed oil well spacing unit along with a map showing the adjoining spacing units. The well is unorthodox to the east boundary of the NE/4SE/4 and to the north east boundary of the SE/4. Both affected spacing units are included in the Burch Keely Federal Unit which covers all of Section 23. Notice has been provided to the operator and working interest owners of that unit. Their waiver of objection is enclosed for your review.

The proposed location will maximize primary recovery by being equidistant from the surrounding wells located in the centers of 40 acre tracts. This location will also increase our secondary/tertiary flood pattern options and give us more flexibility to modify or change flood patterns in the future to maximize oil recovery from this unit. The surface problem encountered was cultural but the fifty foot move was perceived as a reasonable compromise and this was the only acceptable location to the archeologist.

Thank you for your consideration of this. If you need to talk with me further please call me at 800-748-1550.

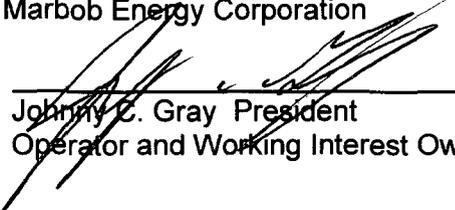
Sincerely,

Raye Miller
Land Department

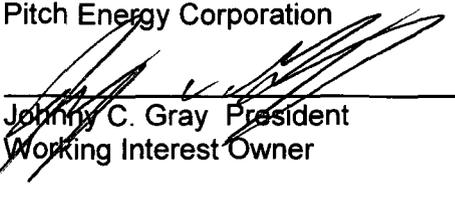
RM/nb
Attachments

Waiver of Objection for the Dodd Federal Unit #501, 2410' FSL and 280' FEL, Section 22, T-17S R-29E:

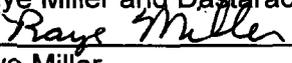
Marbob Energy Corporation

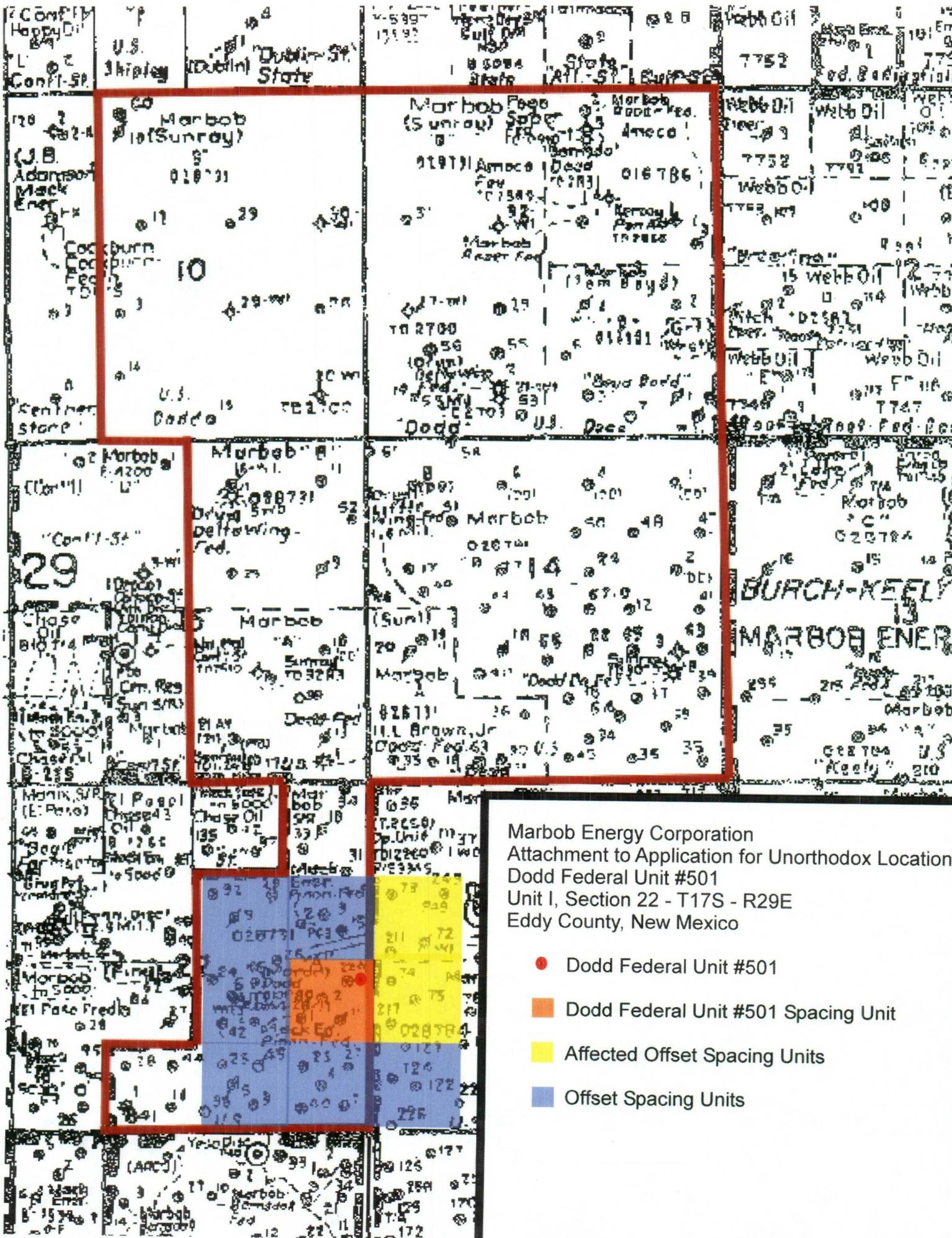
By  _____ NB
Johnny C. Gray President
Operator and Working Interest Owner

Pitch Energy Corporation

By  _____ NB
Johnny C. Gray President
Working Interest Owner

Raye Miller and Dastarac Inc.

By  _____
Raye Miller
Working Interest Owner



Marbob Energy Corporation
 Attachment to Application for Unorthodox Location
 Dodd Federal Unit #501
 Unit I, Section 22 - T17S - R29E
 Eddy County, New Mexico

- Dodd Federal Unit #501
- Dodd Federal Unit #501 Spacing Unit
- Affected Offset Spacing Units
- Offset Spacing Units

DISTRICT I
1625 N. FRENCH DR., HOBBS, NM 88240

DISTRICT II
1301 W. GRAND AVENUE, ARTESIA, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Artec, NM 87410

DISTRICT IV
1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe, New Mexico 87505

Form C-102
Revised JUNE 10, 2003
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

API Number	Pool Code 28509	Pool Name GRBG JACKSON SR Q GRBG SA
Property Code	Property Name DODD FEDERAL UNIT	Well Number 501
OGRID No. 14049	Operator Name MARBOB ENERGY CORPORATION	Elevation 3593'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
1	22	17-S	29-E		2410	SOUTH	280	EAST	EDDY

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres 40	Joint or Infill	Consolidation Code	Order No.
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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

<p>GEODETTIC COORDINATES NAD 27 NME</p> <p>Y=661890.6 N X=585676.4 E</p> <p>LAT.=32°49'09.53" N LONG.=104°03'16.00" W</p>		<p>OPERATOR CERTIFICATION</p> <p>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Nancy T. Bratcher</i> Signature</p> <p>Nancy T. Bratcher Printed Name</p> <p>Land Department Title</p> <p>January 16, 2006 Date</p>
		<p>SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision and that the same is true and correct to the best of my belief.</p> <p>JULY 22, 2005 Date Surveyed</p> <p>DEL</p> <p>Signature & Seal Professional Surveyor</p> <p><i>GARY E. EDSON</i> GARY E. EDSON NEW MEXICO REGISTERED PROFESSIONAL SURVEYOR 05.11.1152</p> <p>Certificate No. GARY E. EDSON 12641</p>