



Plantation Petroleum Companies

Plantation Petroleum Holdings III, LLC; Plantation Operating, LLC

2203 Timberloch Place, Ste. 229
The Woodlands, TX 77380
Tel: (281) 296-7222
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June 22, 2006

E-Mail

Michael E. Stogner, Chief Hearing Officer
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, NM 87505

2006 JUN 28 PM 12 54

**RE: Location Correction for
(Administrative Order No. NSP-143-B-(L)(SD))
R. W. Cowden "C" No. 10 - Proposed Drilling to Jalmat Gas Pool
NW/4, W/2 NE/4, Unit D, Sec 31, T-23S, R-37E
990' FNL & & 660' FWL
Lea County, New Mexico**

Dear Mr. Stogner,

Please note the **Location Correction** for the **R. W. Cowden No. 10** needs to be reflected in **Administrative Order No. NSP-143-B-(L)(SD)** dated September 16, 1996. The previous operator had changed the location to **990' FNL & & 660' FWL, Unit D, Sec 31, T-23S, R-37E** and not **1650' FNL & & 330' FWL, Unit E, Sec 31, T-23S, R-37E** as it was written in the order. A location was built and well cellar installed at the "D" location as the attached plat reflects.

Please find enclosed a copy of the previously approved **Administrative Order No. NSP-143-B-(L)(SD)** dated September 16, 1996 and plats.

Very truly yours,

PLANTATION OPERATING, LLC


John Allred, P.E.
Engineer

cc:

Chris Williams
District Supervisor – District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Donna Mull
APD Permitting – District 1
1625 N. French Drive
Hobbs, New Mexico 88240



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

September 16, 1996

*cc land - Doyle
9-20-96*

Doyle Hartman, Oil Operator
Attention: Don Mashburn
P. O. Box 10426
Midland, Texas 79702

Roca Production, Inc.
Attention: Steven Douglas, President
P. O. Box 10139
Midland, Texas 79702

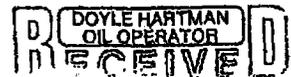
Administrative Order NSP-143-B(L)(SD)

Dear Messrs. Mashburn and Douglas:

Reference is now made to: (i) the application filed by Doyle Hartman, Oil Operator ("Hartman") by letter dated June 20, 1996; (ii) the Division's initial response to said application from Mr. Michael E. Stogner by letter dated June 25, 1996; (iii) to the letter dated August 7, 1996 from Mr. Don Mashburn of Hartman's office in Midland, Texas; (iv) Division Administrative Order NSP-143-A(L)(SD), dated August 14, 1996; and, (v) to the application filed by Roca Production, Inc. ("Roca") by letter dated August 21, 1996: all of which pertain to both parties requests to divide the existing 315.98-acre non-standard gas spacing and proration unit ("GPU") in the Jalmat Gas Pool comprising Lots 1 and 2, the NE/4, and the E/2 NW/4 (N/2 equivalent) of Section 31, Township 23 South, Range 37 East, N.M.P.M., Lea County, New Mexico, into two separate gas spacing and proration units to comprise:

- (a) the 235.98 acres consisting of Lots 1 and 2 (being the W/2 NW/4 equivalent), the W/2 NE/4, and the E/2 NW/4 of said Section 31; and,
- (b) the 80 acres consisting of the E/2 NE/4 of said Section 31.

Said 315.98-acre GPU was authorized by Division Administrative Order NSP-143, dated June 8, 1996 and had dedicated thereon the Doyle Hartman R. W. Cowden "C" Well No. 4/OXY USA, Inc. Myers Langlie Mattix Unit Well No. 61 (API No. 30-025-10903), located at a standard gas well location for the 315.98-acre GPU 990 feet from the North line and 1980 feet from the West line (Unit C) of said Section 31, and, by Division Administrative Order NFL-71, dated February 22, 1983, the R. W. Cowden "C" Well No. 9 (API No. 30-025-27918), located at a standard gas well location 1650 feet from the North line and 800 feet from the East line (Unit H), now operated by Roca Production, Inc., was simultaneously dedicated to said 315.98-acre GPU.



SEP 20 1996

It is our understanding by the subject applications and related correspondence that:

- (1) Hartman will be operator of the proposed 235.98-acre non-standard GPU comprising Lots 1 and 2, the W/2 NE/4, and the E/2 NW/4 of said Section 31 in which said acreage is to be simultaneously dedicated to the aforementioned R. W. Cowden "C" Well No. 4 and to the proposed R. W. Cowden "C" Well No. 10 to be drilled at an unorthodox gas well location 1650 feet from the North line and 330 feet from the West line (Lot 2/Unit E) of said Section 31, and,
- (2) the remaining 80 acres comprising the E/2 NE/4 of said Section 31 is to be operated by Roca Production, Inc. and have dedicated to it the above-described R. W. Cowden "C" Well No. 9 now located at an unorthodox gas well location for the resulting 80-acre GPU.

The Division finds at this time that both of the subject applications filed by Doyle Hartman, Oil Operator and Roca Production, Inc. have been duly filed under the provisions of Rule 104.F of the General Rules and Regulations of the New Mexico Oil Conservation Division ("Division"), revised by Division Order No. R-10533, issued by the Oil Conservation Commission in Case 11,351 on January 18, 1996 and Rule 2(d) of the "General Rules for the Prorated Gas Pools of New Mexico/Special Rules and Regulations for the Jalmat Gas Pool", as promulgated by Division Order No. R-8170, as amended. Pursuant to said rules no objection to the subject applications have been received within the required 20-day waiting periods.

Therefore, by the authority granted me under the provisions of the aforementioned rules applicable in this matter, it is hereby ordered:

- (a) that Doyle Hartman, Oil Operator ("Hartman") be designated the operator of the 235.98 acres, comprising Lots 1 and 2, the W/2 NE/4, and the E/2 NW/4 of said Section 31, thereby forming a non-standard gas spacing and proration unit ("GPU") within the Jalmat Gas Pool in which is to be simultaneously dedicated to the existing R. W. Cowden "C" Well No. 4/OXY USA, Inc. Myers Langlie Mattix Unit Well No. 61 (API No. 30-025-10903), located at a standard Jalmat gas well location for the 235.98-acre GPU 990 feet from the North line and 1980 feet from the West line (Unit C) of said Section 31 and to its proposed R. W. Cowden "C" Well No. 10 to be drilled at an unorthodox gas well location 1650 feet from the North line and 330 feet from the West line (Lot 2/Unit E) of said Section 31. Also, Hartman is hereby authorized to simultaneously dedicate Jalmat gas production from the proposed R. W. Cowden "C" Well No. 10 with the existing R. W. Cowden "C" Well No. 4. Furthermore, Hartman is permitted to produce the allowable assigned the subject GPU from both wells in any proportion; and,
- (b) that Roca Production, Inc. ("Roca") be authorized to operate the

Administrative Order NSP-143-B(L)(SD)

Doyle Hartman/Roca Production, Inc.

September 16, 1996

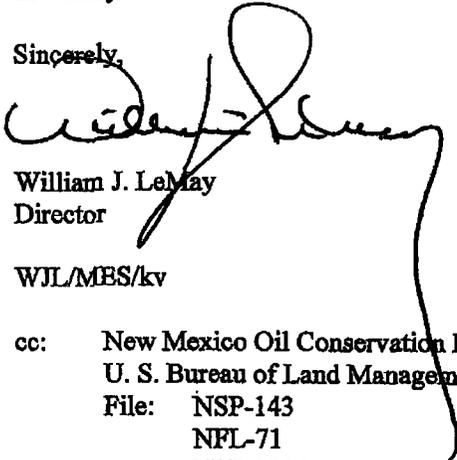
Page 3

remaining 80 acres comprising the E/2 NE/4 of said Section 31, as a non-standard gas spacing and proration unit ("GPU") within the Jalmat Gas Pool in which is to be dedicated to the existing R. W. Cowden "C" Well No. 9 (API No. 30-025-27918), located at an unorthodox gas well location for the subject 80-acre GPU 1650 feet from the North line and 800 feet from the East line (Unit H) of said Section 31.

Division Administrative Orders NSP-143, NFL-71, NSP-143-A(L)(SD) shall be placed in abeyance until further notice.

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

Sincerely,



William J. LeMay
Director

WJL/MBS/kv

cc: New Mexico Oil Conservation Division - Hobbs
U. S. Bureau of Land Management - Carlsbad
File: NSP-143
NFL-71
NSP-1335
NSP-143-A(L)(SD)

State of New Mexico

Energy, Minerals and Natural Resources Department

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

DISTRICT II
1201 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

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

Form C-102
Revised October 12, 2005
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	Pool Name
Property Code	Property Name COWDEN C, R.W.	Well Number 10
OGED No.	Operator Name PLANTATION OPERATING, LLC	Elevation 3325'

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	31	23-S	37-E		990	NORTH	660	WEST	LEA

Bottom Hole Location if Different From Surface

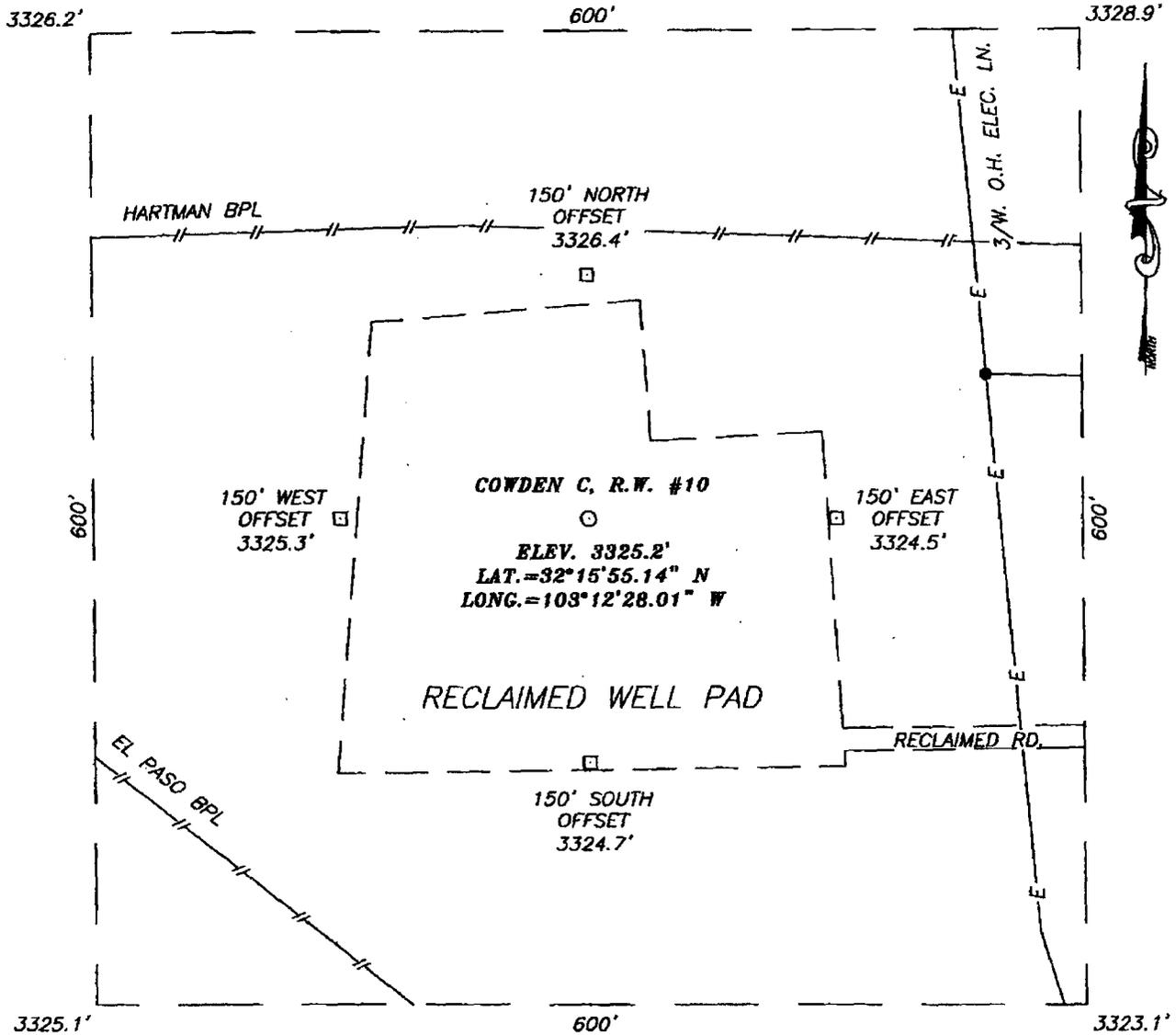
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres 235.98	Joint or Infill	Consolidation Code	Order No. NSP-143-B-(1)(D)
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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

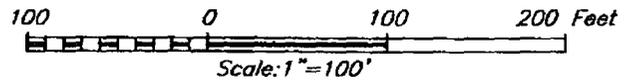
	LOT 1					<p>OPERATOR CERTIFICATION</p> <p>I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p><i>[Signature]</i> Signature Date JOHN ALLEGRO Printed Name</p>	
	37.93 AC LOT 2	<p>GEODETTIC COORDINATES NAD 27 NME</p> <p>Y=462064.2 N X=847916.2 E</p> <p>LAT.=32°15'55.14" N LONG.=103°12'28.01" W</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>MAY 17, 2006</p> <p>Date Surveyed MR Signature & Seal of Professional Surveyor <i>[Signature]</i> 06.11.0849 Certificate No. GARY KIDSON 12841 RONALD J. KIDSON 3239</p>
	37.95 AC LOT 3						
	37.97 AC LOT 4						
37.99 AC							

SECTION 31, TOWNSHIP 23 SOUTH, RANGE 37 EAST, N.M.P.M.,
 LEA COUNTY, NEW MEXICO



DIRECTIONS TO LOCATION

FROM THE INTERSECTION OF ST. HWY. #18 AND CO. RD. J-8 (DEEPWELLS RD.), GO WEST ON CO. RD. J-8 APPROX. 0.6 MILES. VEER RIGHT AND GO NORTH APPROX. 0.3 MILES. TURN LEFT AND GO NORTHWEST APPROX. 0.5 MILES. TURN RIGHT AND GO NORTH APPROX. 0.3 MILES. TURN LEFT (ON RECLAIMED ROAD) AND GO WEST APPROX. 300 FEET. THIS LOCATION IS APPROX. 217 FEET NORTHWEST.



PROVIDING SURVEYING SERVICES
 SINCE 1948
JOHN WEST SURVEYING COMPANY
 412 N. DAL PASO
 HOBBS, N.M. 88240
 (505) 393-3117

PLANTATION OPERATING, LLC

COWDEN C, R.W. #10
 LOCATED 990 FEET FROM THE NORTH LINE
 AND 660 FEET FROM THE WEST LINE OF SECTION 31,
 TOWNSHIP 23 SOUTH, RANGE 37 EAST, N.M.P.M.,
 LEA COUNTY, NEW MEXICO.

Survey Date: 05/17/06	Sheet 1 of 1 Sheets
W.O. Number: 06.11.0849	Dr By: M.R. Rev 1:N/A
Date: 05/22/06	Disk: CD#6 06110849 Scale: 1"=100'