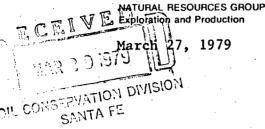


PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK



Re: Unorthodox Locations--East Vacuum Grayburg San Andres Unit, Vacuum Grayburg San Andres Pool, Lea County, New Mexico

New Mexico Department of Energy and Minerals (3) Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey, Division Director

Gentlemen:

Confirming telephone conversation of January 22, 1979, and verbal approval granted therein, we respectfully request administrative approval of unorthodox locations for the following wells to be drilled in the East Vacuum Grayburg San Andres Unit, Vacuum Grayburg San Andres Pool, Lea County. Such action is provided under Rule 104, Section F. Special order no. R-5897 approved unorthodox locations for the wells listed; however, when staked, it was necessary to move the locations minimum distances to clear pipe or electric lines, or surface topographical obstacles.

Respective new well locations are shown below. Also shown is the location approved by referenced order. The attached unit plat details the new locations and dedicated proration units.

1. 1021

Tract 2739, Well No. 005 - Unit K, 1330' FS and 1380' FW lines, Section 27, T-17-S, R-35-E. (R-5897 approved the original location as Tract 2721, Well no. 001 - 1310' FS and W lines of above section. The move necessitated new tract and well designation.)

2. Tract 2801, Well No.002 - Unit M, 1140' FS and 1310' FW lines, γ Section 28, T-17-S, R-35-E. (R-5897 approved the original location at 1310' FS & W lines, above section.)

3. Tract 3202, Well No. 001 - Unit I, 1330' FS and 1310' FE lines, Section 32, T-17-S, R-35-E. (R-5897 approved the original location at 1310' FS and 1330' FE lines, above section.)

4. Tract 3202, Well No. 003 - Unit B, 1180' FN and 1480' FE lines, Section 32, T-17-S, R-35-E. (R-5897 approved the original location 10^{10} at 1330' FN & E lines, above section.)

5. Tract 3229, Well No. 005 - Unit M, 1110' FS and 1290' FW lines, Section 32, T-17-S, R-35-E. (R-5897 approved the original location at 1310' FS & W lines, above section.) New Mexico Department of Energy and Minerals March 27, 1979

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8.

6.

Tract 3308, Well No. 003 - Unit C, 1150' FN and 1510' FW lines, Section 33, T-17-S, R-35-E. (R-5897 approved the original location as Tract 3366, Well No. 001 at 1330' FN and 1310' FW lines, above section. The move necessitated new tract and well designation.)

Tract 3328, Well No. 002 - Unit M, 1310' FS and 1160' FW lines, 7. Section 33, T-17-S, R-35-E. (R-5897 approved the original location at 1310' FS & W lines, above section.)

Tract 3333, Well No. 004 - Unit H, 1380' FN and 1280' FE lines, Section 33, T-17-S, R-35-E. (R-5897 approved the original location 102.8 at 1330' FN & E lines, above section.)

9. Tract 3456, Well No. 005 - Unit C, 1030' FN and 1410' FW lines, Section 34, T-17-S, R-35-E. (R-5897 approved the original location at 1330' FN and 1310' FW lines, above section.)

All locations exceed 330' from the nearest unit boundary and are no closer than 10' to any quarter-quarter section line. Appropriate Forms C 101 and 102 have been filed with the Hobbs district office.

Texaco, Inc.'s Central Vacuum Unit is a diagonal offset to Tract 3229, Well No.005. A copy of this request has been furnished Texaco by certified mail.

Your confirmation of verbal approval will be appreciated.

Very truly yours.

T. Harold McLemore Area Regulation and Proration Analyst

THM:jj

Attachments

Texaco Inc., Box 3109, Midland, TX 79702 (certified mail) cc: Oil Conservation District, Hobbs, NM 88240

Attachments