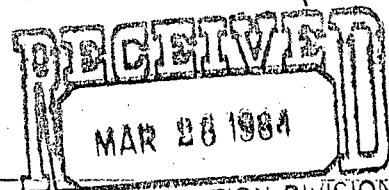


marbob

energy corporation

March 22, 1984



OIL CONSERVATION DIVISION
SANTA FE

Joe D. Ramey
Director
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

NSL- 1808

RULE 104 FI

RELEASE APRIL 3, 1984

FEDERAL LEASE

Dear Mr. Ramey:

The purpose of this letter is to request administrative approval without notice and hearing of unorthodox well locations within a secondary recovery project. The well locations for which administrative approval are sought are the M. Dodd B No. 37 located 1345 feet FSL and 1295 feet FEL in Section 14, Township 17 South, Range 29 East, the M. Dodd B No. 38 located 1345 feet FSL and 2310 feet FEL in Section 14, Township 17 South, Range 29 East, and the M. Dodd B No. 39 located 330 feet FEL and 1345 feet FSL in Section 14, Township 17 South, Range 29 East, all in Eddy County, New Mexico. The wells will be completed in the Grayburg San Andres formation in the Grayburg Jackson Seven Rivers Queen/Grayburg San Andres Pool. The wells will permit and continue to effect an efficient production and injection pattern within the secondary recovery project and are necessary for adequate drainage. Note that these locations are not closer than 330 feet to an outer boundary of the lease nor closer than 10 feet to any quarter quarter section line.

Attached to this application as Exhibits A, B, C, D, and E are the following:

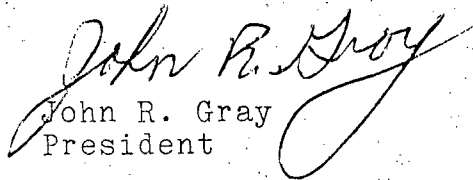
- A. Well location and Acreage
Dedication Plats (Form C-102)
on each well will be filed with the Artesia
office of the Oil Conservation Division.
- B. A list of wells located within the
secondary recovery project indicating
specifically which wells are production
and which are injection wells.

C. A plat showing the ownership of the offsetting leases.

Phillips Oil Company (formerly General American) and Marbob are the only operators of proration units offsetting the proration units containing the proposed unorthodox locations in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool. Phillips Oil has been notified of this application by certified mail and has been requested to notify you if they have no objections. Please note that the M. Dodd B No. 38 well is located in the NW1/4SE1/4 of Section 14-17-29 and all proration units surrounding that quarter quarter section are being operated by Marbob in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool. There is therefore no offset operator which needs to be notified as to this location.

Thank-you very much for your help in this matter. Should you have any further questions or be in need of any additional information, please contact Kevin Bliss or Raye P. Miller.

Sincerely,


John R. Gray
President

JRG:kph

**NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT**

Form C-102
Supersedes C-128
Effective 1-1-65

All distances must be from the outer boundaries of the Section

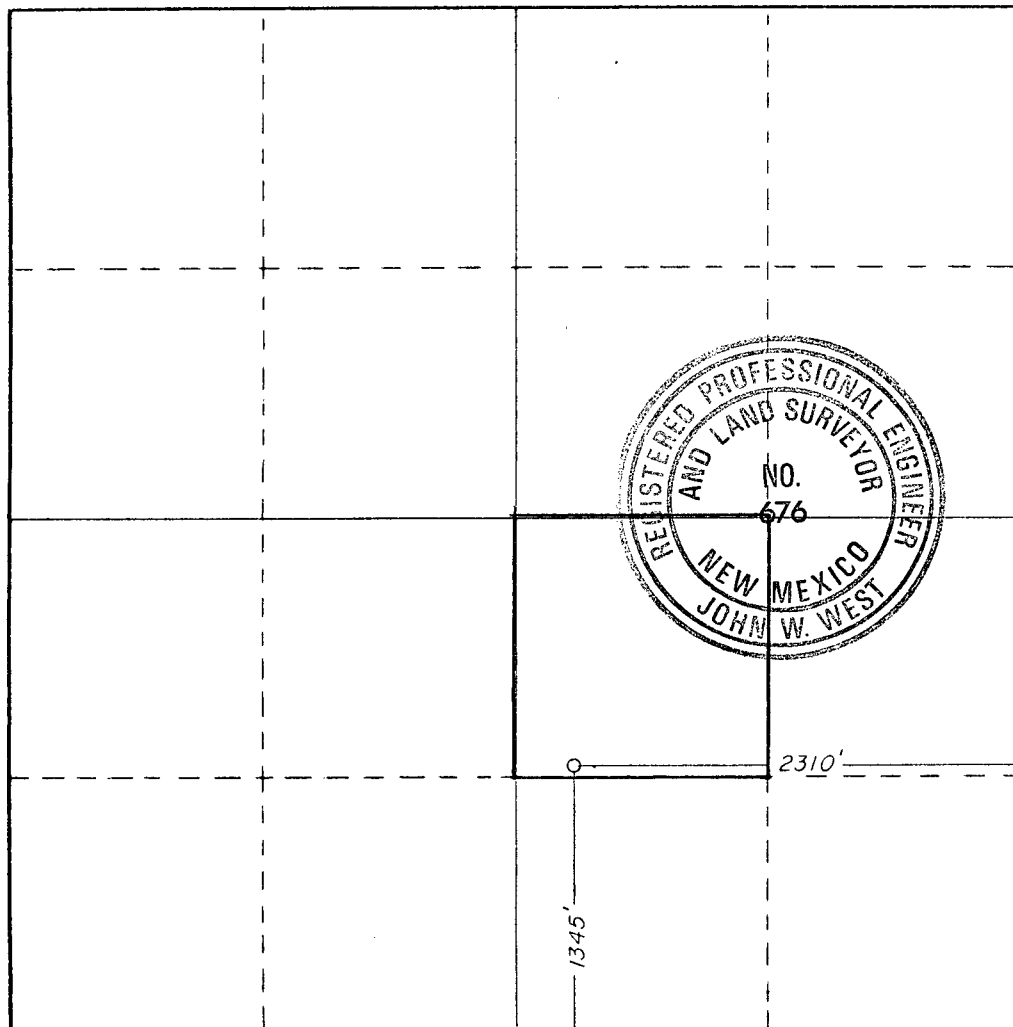
Operator MARBOB ENERGY CORP.			Lease M DOBB "B"		Well No. 38
Unit Letter J	Section 14	Township 17S	Range 29E	County EDDY	
Actual Footage Location of Well: 1345 feet from the SOUTH line and 2310 feet from the EAST line					
Ground Level Elev. 3616.4 3612.7 GL	Producing Formation San Andres		Pool Grayburg Jackson	Dedicated Acreage: 40 Acres	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

☐ Yes ☐ No If answer is "yes," type of consolidation _____

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Name

Carolyn Orris

Position

Production Clerk

Company

Marbob Energy Corporation

Date

3/22/84

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 knowledge and belief.

Date Surveyed

3/12/84

Registered Professional Engineer and/or Land Surveyor

Certificate No. **JOHN W. WEST, 676**
RONALD J. EIDSON, 3239

0 330 660 990 1320 1650 1980 2310 2640 2970 3300 3630 3960 4290 4620 4950 5280 5610 5940 6270 6600

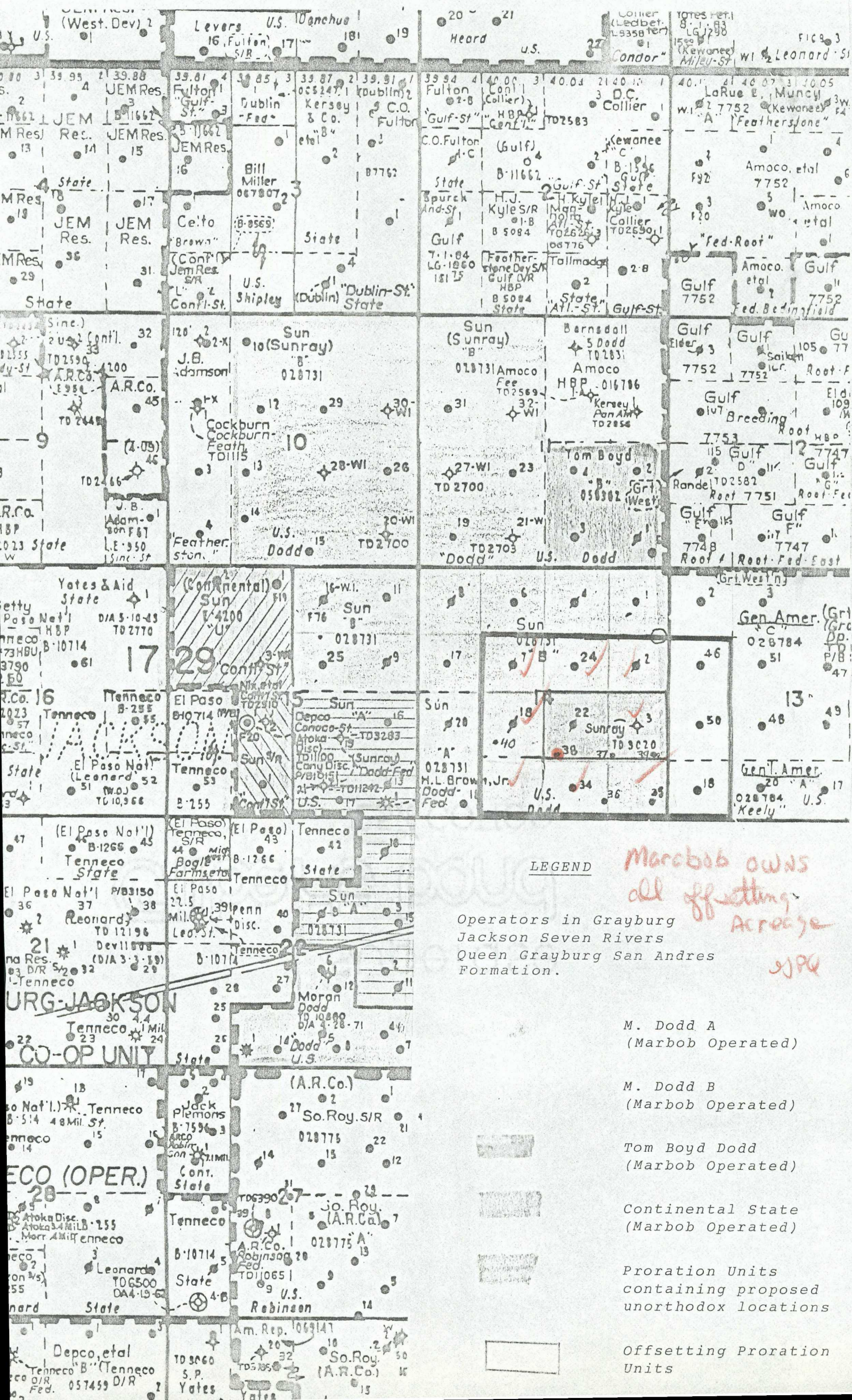


EXHIBIT D

TOM BOYD DODD (U.S. LEASE NO. 058362)

<u>WELL NO.</u>	<u>LEGAL DESCRIPTION</u>	<u>TYPE OF WELL</u>
2	1980 FSL 660 FEL 11-17-29	Production
3	660 FSL 1980 FEL 11-17-29	Production
4	1980 FSL 1980 FEL 11-17-29	Injection
5	330 FSL 330 FEL 11-17-29	Injection
6	1295 FSL 2310 FEL 11-17-29	Production (Proposed)

CONTINENTAL STATE (NM LEASE NO. E-4200)

1	660 FSL 1980 FWL 15-17-29	Production
2	1980 FSL 1980 FWL 15-17-29	Production (Plugged)
3	1980 FNL 1980 FWL 15-17-29	Production (Plugged)

Underlined wells indicate the wells for which administrative approval of unorthodox location is sought herein.

EXHIBIT D

MARY DODD A (U.S. LEASE NO. 028731 A)

<u>WELL NO.</u>	<u>LEGAL DESCRIPTION</u>	<u>TYPE OF WELL</u>
1	330 FSL 1650 FWL 22-17-29	Production (Plugged)
2	1980 FSL 660 FEL 22-17-29	Production
3	1980 FNL 660 FEL 22-17-29	Production
4	660 FSL 660 FEL 22-17-29	Production
5	660 FSL 1980 FEL 22-17-29	Production (Plugged)
6	1980 FSL 1980 FEL 22-17-29	Production
7	330 FSL 330 FEL 22-17-29	Production
8	330 FSL 1650 FEL 22-17-29	Production
9	1980 FNL 1980 FEL 22-17-29	Injection (Plugged)
10	675 FNL 660 FEL 22-17-29	Injection
11	1650 FSL 330 FEL 22-17-29	Production
12	1650 FSL 1650 FEL 22-17-29	Production
13	660 FSL 660 FEL 15-17-29	Production
14	330 FSL 2310 FWL 22-17-29	Production
15	2160 FNL 330 FEL 22-17-29	Production
16	1980 FSL 660 FEL 15-17-29	Production
17	350 FSL 1650 FEL 15-17-29	Production
18	330 FSL 990 FWL 14-17-29	Production
19	1650 FSL 1650 FEL 15-17-29	Injection
20	1980 FSL 660 FWL 14-17-29	Injection
21	660 FSL 1934 FEL 15-17-29	Production (re-entry)
22	2310 FSL 330 FEL 22-17-29	Production
23	2615 FSL 1345 FEL 22-17-29	Production
24	2310 FSL 2310 FEL 22-17-29	Production
25	990 FSL 2210 FEL 22-17-29	Production
26	2615 FSL 1345 FEL 22-17-29	Production
27	940 FSL 330 FEL 22-17-29	Production
28	990 FSL 1652 FWL 22-17-29	Production
29	1650 FNL 1370 FEL 22-17-29	Production
30	330 FSL 1980 FWL 14-17-29	Production
31	1650 FNL 330 FEL 22-17-29	Production(Proposed)
32	1650 FNL 2210 FEL 22-17-29	Production(Proposed)

EXHIBIT D

MARY DODD B. (U.S. LEASE NO. 028731 B)

<u>WELL NO.</u>	<u>LEGAL DESCRIPTION</u>	<u>TYPE OF WELL</u>
1	660 FNL 660 FEL 14-17-29	Production
2	1980 FNL 660 FEL 14-17-29	Injection
3	1980 FNL 660 FWL 14-17-29	Production
4	660 FNL 1980 FEL 14-17-29	Injection
6	660 FNL 1980 FWL 14-17-29	Production
7	1980 FNL 1980 FWL 14-17-29	Injection (Plugged)
8	660 FNL 660 FWL 14-17-29	Injection
9	1980 FNL 660 FEL 15-17-29	Injection (Plugged)
10	660 FNL 1980 FWL 10-17-29	Production
11	660 FNL 660 FEL 15-17-29	Production
12	1980 FNL 1980 FWL 10-17-29	Production
13	1980 FSL 1650 FWL 10-17-29	Production
14	990 FSL 1650 FWL 10-17-29	Production
15	330 FSL 2310 FEL 10-17-29	Production
16	660 FNL 1980 FEL 15-17-29	Injection
17	1980 FNL 660 FWL 14-27-29	Production
18	1980 FWL 1980 FSL 14-17-29	Injection (Plugged)
19	660 FSL 660 FWL 11-17-29	Production
20	660 FSL 660 FEL 10-17-29	Injection
21	660 FSL 1980 FWL 11-17-29	Injection
22	1980 FSL 1980 FEL 14-17-29	Injection
23	1980 FSL 1980 FWL 11-17-29	Production
24	1980 FNL 1980 FEL 14-17-29	Production
25	1980 FNL 1980 FEL 15-17-29	Production
26	1980 FSL 660 FEL 10-17-29	Production
27	1980 FSL 660 FWL 11-17-29	Injection
28	1980 FSL 1980 FEL 10-17-29	Injection
29	1980 FNL 1980 FEL 10-17-29	Production
30	1980 FNL 660 FEL 10-17-29	Injection
31	1980 FNL 660 FWL 11-17-29	Production
32	1980 FNL 1980 FWL 11-17-29	Injection
34	660 FSL 1980 FEL 14-17-29	Production
35	330 FSL 330 FEL 14-17-29	Production
36	330 FSL 1345 FEL 14-17-29	Production
<u>37</u>	<u>1345 FSL 1295 FEL 14-17-29</u>	<u>Production</u>
		(Proposed)
<u>38</u>	<u>1345 FSL 2310 FEL 14-17-29</u>	<u>Production</u>
		(Proposed)
<u>39</u>	<u>330 FEL 1345 FSL 14-17-29</u>	<u>Production</u>
		(Proposed)
40	1650 FSL 1650 FWL 14-17-29	Production
		(Proposed)



marbob

energy corporation

March 22, 1984

Phillips Oil Company
4001 Penbrook
Odessa, Texas 79762
Attn: Harold McLemore

4/3/84
OPQ

RE: M. Dodd B. No. 37
1345 FSL, 1295 FEL
Sec. 14, T-17S, R-29E.
M. Dodd B. No. 39
330 FEL, 1345 FSL
Sec. 14, T-17S, R-29E.
Eddy County, New Mexico
Grayburg Jackson Seven
Rivers Queen Grayburg
San Andres Pool.

Gentlemen:

Marbob Energy Corporation as operator of the M. Dodd B Lease and the above referenced wells hereby notifies you that we have applied to the New Mexico Oil Conservation Division for administrative approval of the above referenced unorthodox well locations and have applied for a permit to drill at the above locations. Administrative approval is being sought on the basis that the wells are being drilled in a secondary recovery project.

You are being contacted as an operator of a proration unit offsetting the above described locations in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool. If you have no objections to the drilling of these wells please sign below and forward one copy to the NMOCD in Santa Fe, one copy to this office, and retain one copy for your files. I have provided addressed stamped envelopes for your convenience.

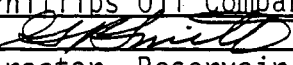
Thank-you very much for your cooperation in this matter.
Please do not hesitate to contact me should you have any
questions.

Sincerely



Kevin J. Bliss
Land Department

APPROVAL

COMPANY: Phillips Oil Company
BY:  G. R. Smith
TITLE: Director, Reservoir Engineering
DATE: 3-29-84

CRRR: