

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 18, 2000

Penwell Energy, Inc. c/o Campbell, Carr, Berge & Sheridan, P.A. P. O. Box 2208 Santa Fe, New Mexico 87504-2208 Attention: William F. Carr

Telefax No. (505) 983-6043

Administrative Order NSL-2053-A

Dear Mr. Carr:

Reference is made to the following: (i) your initial application on behalf of the operator Penwell Energy, Inc., L.L.C. ("Penwell"), dated August 29, 2000, as amended by letter dated October 16, 2000; and (ii) the records of the New Mexico Oil Conservation Division ("Division") in Santa Fe, including the file on Division Administrative Order NSL-2053: all concerning Penwell's request for an unorthodox Entrada oil well for its Torreon Wash "36" State Well No. 1 to be drilled 2143 feet from the South line and 1223 feet from the East line (Unit I) of Section 36, Township 20 North, Range 5 West, NMPM, McKinley County, New Mexico. The NE/4 SE/4 of Section 36 is to be dedicated to the well in order to form a standard 40-acre oil spacing and proration unit within the Arena Blanca-Entrada Oil Pool.

It is our understanding that Penwell is seeking an exception to New Mexico Oil Conservation Division ("Division") Rule 104.B (1), revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999, based on interpretation of a 3-D seismic survey of the immediate area and from past well bore completions in the Entrada within this 40-acre unit, whereby it contends that a well drilled at the proposed location within the subject 40-acre unit will be at a more favorable geologic position within the potentially oil productive interval of the Entrada formation.

It is further understood that all of Section 36 is included within a single State lease (Lease No. VA-1683) in which Penwell is the leasehold operator; therefore, there are no effected offsets to the subject 40-acre tract within the Entrada interval other than Penwell.

This application has been duly filed under the provisions of Division Rule 104.F,

By the authority granted me under the provisions of Division Rule 104.F (2), the above-described unorthodox oil well location is hereby approved.

Sincerely,

Lori Wrotenbery

Director

cc:

LW/MES/kv

New Mexico Oil Conservation Division - Aztec

New Mexico State Land Office - Santa Fe

File: NSL-2053

REMARKS: Division Administrative Order NSL-2053, dated May 23, 1985, and Division Order No. R-10025, issued in Case No. 10865 dated December 1, 1993, which orders dealt with Entrada development within this 40-acre tract shall be placed in abeyance until further notice.