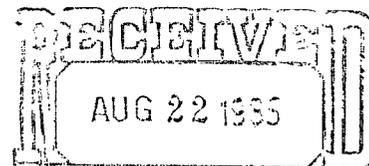




marbob
energy corporation



OIL CONSERVATION DIVISION
SANTA FE

August 7, 1985

2 wells NSL-2146
RULE-104F(E)

Richard L. Stamets
Director
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501
Attention: Gilbert Quintana

Dear Mr. Stamets:

The purpose of this letter is to request administrative approval without notice and hearing of unorthodox well locations pursuant to Order R-7808 of the New Mexico Oil Conservation Division. The following is a list of the footage locations for which administrative approval of unorthodox well locations are sought:

M. Dodd "A" No. 37
1345 FSL 330 FWL
Section 14, T-17S, R-29E
Eddy County, New Mexico

40 Acre decd NW1/4 SW1/4 - Sect 14

M. Dodd "A" No. 39
1295 FSL 990 FEL
Section 15, T-17S, R-29E
Eddy County, New Mexico

40 Acre decd SE1/4 SE1/4 - Sect 15

The wells will be completed in the Grayburg San Andres formation in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool. Note that these locations are no closer than 330 feet to an outer boundary of a lease, or in the case of a unit, unitized area, nor closer than 10 feet to any quarter quarter section line or subdivision inner boundary.

Attached to this application as Exhibits A through D are the following:

- A. Well location and Acreage
Dedication Plats (Forms C-102)
filed with the Artesia office
of the Oil Conservation
Division (Exhibits "A" & "B").

- B. A plat showing the proposed unorthodox locations, the respective proration units, and the offsetting proration units including ownership of the offsetting proration units in the Grayburg San Andres formation in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool (Exhibit "C").

- C. A copy of the letter of notification sent to the operator or owner of proration units offsetting proration units containing the proposed unorthodox locations in the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool (Exhibit "D").

The letter attached as Exhibit "D" has been sent to the offset operator by certified mail and he has been requested to notify you if he has no objections. Note that with the exception of the operator notified Marbob Energy Corporation is the operator of all offsetting proration units in the Grayburg San Andres formation of the Grayburg Jackson Seven Rivers Queen Grayburg San Andres Pool.

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 Ron Head or Raye P. Miller.

Sincerely,



Mack C. Chase
President

MCC/rsr

**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.

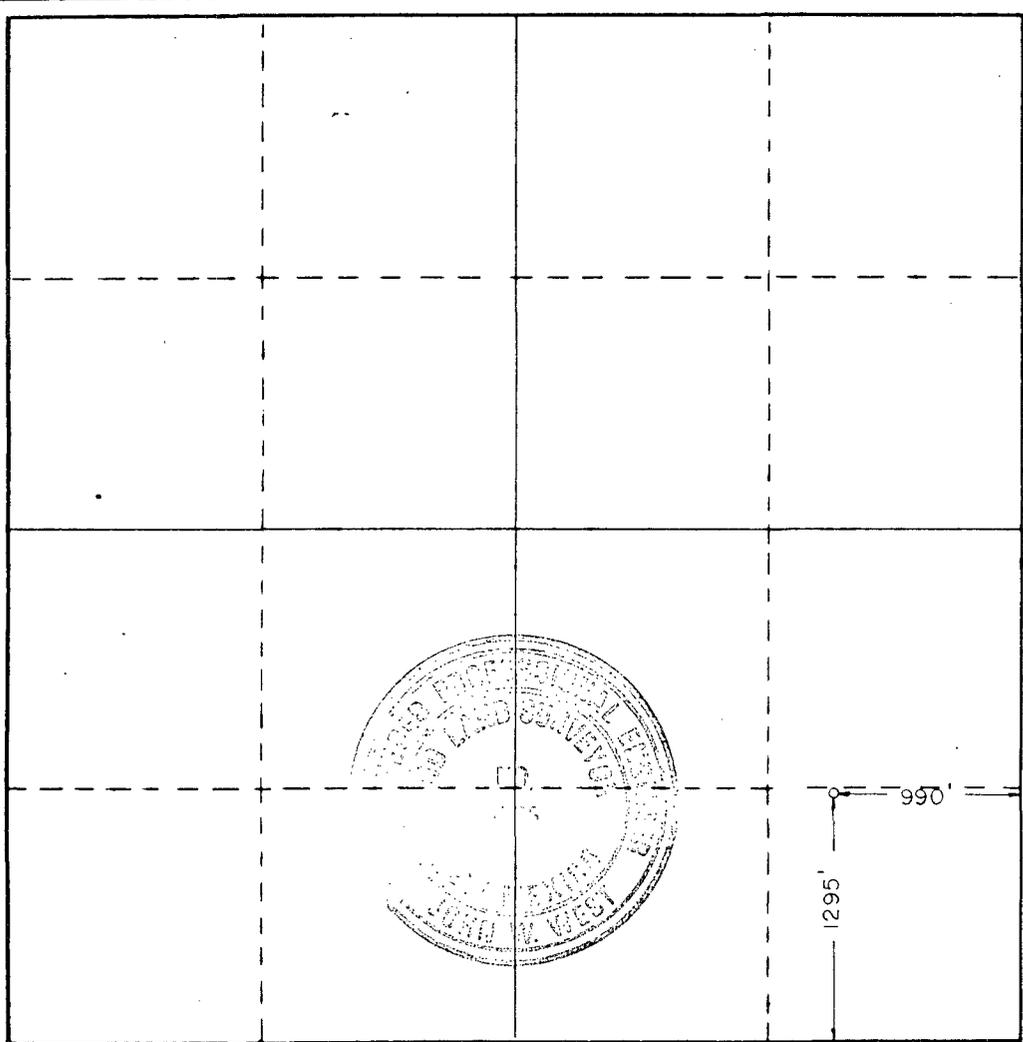
Operator MARBOB ENERGY CORP.		Lease M DODD "A"			Well No. 39
Unit Letter P	Section 15	Township 17S	Range 29E	County EDDY	
Actual Footage Location of Well: 1295 feet from the SOUTH line and 990 feet from the EAST line					
Ground Level Elev. 3597.3	Producing Formation		Pool		Dedicated Acreage: Acres

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

Position

Company

Date

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

5/17/85

Registered Professional Engineer and/or Land Surveyor

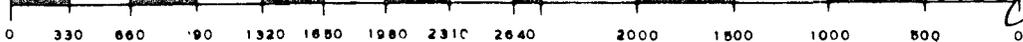
[Signature]

Certificate No. **JOHN W. WEST,**

676

RONALD J. EIDSON,

3239



**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.

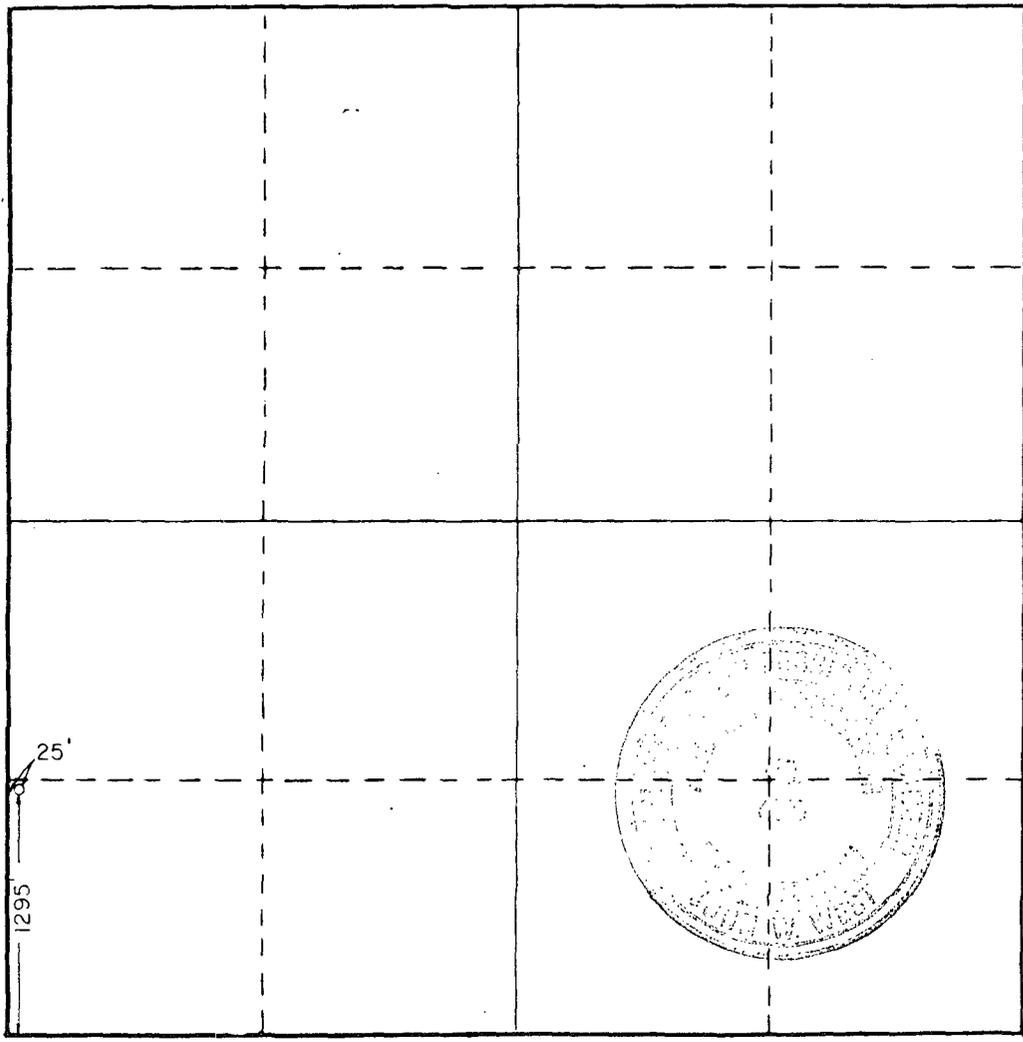
Operator MARBOB ENERGY CORP.		Lease M DODD "A"		Well No. 38	
Unit Letter M	Section 14	Township 17S	Range 29E	County EDDY	
Actual Footage Location of Well: : 1295 feet from the SOUTH line and 25 feet from the WEST line					
Ground Level Elev. 3588.5	Producing Formation	Pool	Dedicated Acreage: Acres		

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

Position

Company

Date

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

5/17/85

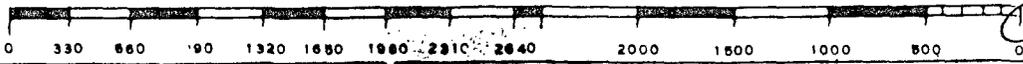
Registered Professional Engineer and/or Land Surveyor

John W. West

Certificate No. **JOHN W. WEST, 676**

RONALD J. EIDSON, 3239

91746



County _____ Pool _____

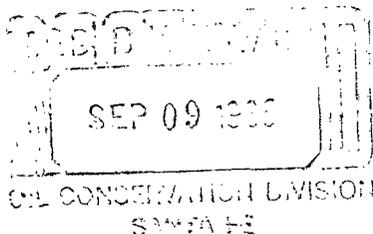
TOWNSHIP _____ South, RANGE _____ East, NEW MEXICO PRINCIPAL MERIDIAN

6	5	4	3	2	1
7	8	9	10	11	12
13	17	16	15	14 #39 • • #37	13
19	20	21	22	23	24
29	28	28	27	26	25
31	32	33	34	35	36



marbob
energy corporation

NSL-2146



August 7, 1985

Phillips Petroleum Corporation
P. O. Box 1967
Houston, Texas 77001

RE: M. Dodd "A" No. 39
1295 FSL, 990 FEL
Sec. 15, T-17S, R-29E
All in Eddy County, New
Mexico in the Grayburg
Jackson Seven Rivers Queen
Grayburg San Andres Pool.

Gentlemen:

Marbob Energy Corporation as operator of the above wells hereby notifies you that we have applied to the New Mexico Oil Conservation Division for administrative approval without notice and hearing of unorthodox locations pursuant to Order R-7808 of the New Mexico Oil Conservation Division.

You are being contacted as an operator or owner 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 this well 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.

RECEIVED
PARTNERSHIP OPER.

8/13/85

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

Sincerely,



Ron Head
Land Department

RH/rr

APPROVAL

COMPANY: Phillips Petroleum Company
BY: *G. R. Smith*
TITLE: Director, Reservoir Engineering
DATE: 9/5/85

CRRR