

DATE IN 9/7/07	SUSPENSE	D. BROOKS ENGINEER	LOGGED IN 9/7/07	TYPE NSP	APP NO. PTD50725052801
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
- Engineering Bureau -
1220 South St. Francis Drive, Santa Fe, NM 87505



COG
State 5-19#33

2007 SEP 7 AM 11 06

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

- [1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]
- [A] Location - Spacing Unit - Simultaneous Dedication
☐ NSL ☒ NSP ☐ SD
- Check One Only for [B] or [C]
- [B] Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM
- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR
- [D] Other: Specify _____
- [2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☐ Does Not Apply
- [A] ☐ Working, Royalty or Overriding Royalty Interest Owners
- [B] ☐ Offset Operators, Leaseholders or Surface Owner
- [C] ☐ Application is One Which Requires Published Legal Notice
- [D] ☒ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] ☐ Waivers are Attached
- [3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

Patrick Lyons
P O Box 1148
Santa Fe, NM 87504-1148

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

PHYLLIS A. EDWARDS
Print or Type Name

Signature

REGULATORY ANALYST
Title

Date

432-685-4340

pedwards@conchoresources.com
e-mail Address

9/6/07

State S-19 #33

COG proposes to drill a SW / 4, 27.40 acre spacing
Empire: Glorieta-Yeso oil well
TD of approximately 5400'

Location:
1650' FNL & 1250' FWL Sec 19, T17S, R29E, Lot 3 Eddy County, NM

This location is in Lot 3 and is 27.40 acres which is approximately 70% of a 40 acre unit, and therefore a Non Standard Spacing Unit. The proposed location is the second Empire Yeso well in this lot.

The plan for this well is to complete it in the Yeso formation. We won't know the exact perms until we drill & log it, but it will be very similar to the State S-19 #31 (1650' FSL & 330' FWL, Lot 3) which was completed in May 2007.

The State S-19 #31 completion broke the Yeso up into 2 perf/stimulation intervals. At this time, we assume the State S-19 #33 should be very similar.

State S-19 #31 has perms from: 4349' – 5068' overall, but broken up into 2 separate intervals, with 2 separate fracs.

1st interval: 4349' – 4569',
acidized w/ 2500 gals,
frac'd w/ 95,096 gals gel, 8,011 # LiteProp, & 76,756# 16/30 sand.

2nd interval: 4788' – 5068',
acidized w/ 2000 gals,
frac'd w/ 76,996 gals gel, 8000# LiteProp, & 50,620# 16/30 sand.

Attachment 1

Plat showing 27.94 acre spacing

Attachment 2

Map & legend of offset wells.

Attachment 3

Updated land plat showing COG Operating LLC acreage.

COG owns the S/2 of Section 19.

This location is not encroaching the offsetting units.

The proposed location is the third Empire Yeso well in this Lot.

COG Operating LLC respectfully requests administrative approval without hearing for this Non-standard Spacing Unit.

DISTRICT I

626 N. FRENCH DR., HOBBS, NM 88240

DISTRICT II

1301 W. GRAND AVENUE, ARTESIA, NM 88210

DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV

1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

State of New Mexico

Energy, Minerals and Natural Resources Department

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 96210	Pool Name EMPIRE; GLORIETA YESO
Property Code 302569	Property Name STATE S-19		Well Number 33
OGRID No. 229137	Operator Name COG OPERATING, LLC		Elevation 3668'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
3	19	17-S	29-E		1650	SOUTH	1250	WEST	EDDY

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	Joint or Infill	Consolidation Code	Order No.
27.40			

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 27.36 AC LOT 2 27.28 AC LOT 3 27.40 AC LOT 4 27.50 AC 1250' 1650' GEODETIC COORDINATES NAD 27 NME Y=661102.4 N X=566501.4 E LAT.=32.817271° N LONG.=104.116867° W	OPERATOR CERTIFICATION 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: <i>Phyllis A. Edwards</i> 9/6/07 Signature Date PHYLLIS. A. EDWARDS Printed Name REGULATORY ANALYST SURVEYOR CERTIFICATION 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. <i>Ronald J. Eidson</i> 9/9/07 Signature Date RONALD J. EIDSON Professional Surveyor 3239 Certificate No. GARY EIDSON 12641 RONALD EIDSON 3239
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Offset wells to State S-19 #33

API#	Operator	Lease	Well#	Legal	Prac. IP (BO/D)	Prac. IP (MCF/D)	First Prod.	Avg. (BO/D)	Avg. (MCF/D)	Last Prod.	Cumu Oil
30-015-04192	MARBOB ENERGY CORP	BURCH KEELY UNIT	058	S:19, T:17S, R:30E	1.36	8.39	Jan 1979	8.06	8.87	May 2007	
30-015-04192	MARBOB ENERGY CORP	BURCH KEELY UNIT	058	S:19, T:17S, R:30E	15.46	44.36	Jan 1973	1.77	8.29	Dec 1977	
30-015-04193	MARBOB ENERGY CORP	BURCH KEELY UNIT	096	S:19, T:17S, R:30E	1.46	4.21	Jan 1973	3.87	17.90	Dec 1977	
30-015-04193	MARBOB ENERGY CORP	BURCH KEELY UNIT	096	S:19, T:17S, R:30E	2.86	18.11	Jan 1979	0.90	1.19	May 2007	
30-015-04194	MARBOB ENERGY CORP	BURCH KEELY UNIT	092	S:19, T:17S, R:30E							
30-015-04195	MARBOB ENERGY CORP	BURCH KEELY UNIT	060	S:19, T:17S, R:30E							
30-015-04196	MARBOB ENERGY CORP	BURCH KEELY UNIT	059	S:19, T:17S, R:30E	0.21	1.29	Jan 1979	0.58	0.84	May 1986	
30-015-04196	MARBOB ENERGY CORP	BURCH KEELY UNIT	059	S:19, T:17S, R:30E	2.07	6.32	Jan 1974	0.29	1.29	Dec 1977	
30-015-04198	MARBOB ENERGY CORP	BURCH KEELY UNIT	057	S:19, T:17S, R:30E	1.39	25.04	Jan 1993	1.42	29.03	May 2007	
30-015-04199	MARBOB ENERGY CORP	BURCH KEELY UNIT	054	S:19, T:17S, R:30E	3.14	9.93	Jan 1972	1.52	6.74	Dec 1977	
30-015-04199	MARBOB ENERGY CORP	BURCH KEELY UNIT	054	S:19, T:17S, R:30E	1.11	6.82	Jan 1979	2.87		May 2007	
30-015-04201	MARBOB ENERGY CORP	BURCH KEELY UNIT	052	S:19, T:17S, R:30E	0.36	0.50	Jan 1993	0.35	0.58	May 2007	
30-015-04202	MARBOB ENERGY CORP	BURCH KEELY UNIT	056	S:19, T:17S, R:30E	6.83	29.41	Jan 1976	3.74	17.42	Dec 1977	
30-015-04202	MARBOB ENERGY CORP	BURCH KEELY UNIT	056	S:19, T:17S, R:30E	2.79	17.64	Jan 1979	3.55	23.71	May 2007	
30-015-04203	MARBOB ENERGY CORP	BURCH KEELY UNIT	099	S:19, T:17S, R:30E	1.11	6.82	Jan 1979	3.77	3.84	May 2001	
30-015-04203	MARBOB ENERGY CORP	BURCH KEELY UNIT	099	S:19, T:17S, R:30E	3.39	9.75	Jan 1973	1.52	6.74	Dec 1977	
30-015-04204	MARBOB ENERGY CORP	BURCH KEELY UNIT	095	S:19, T:17S, R:30E	0.68	8.71	Jan 1993			May 2007	
30-015-04205	MARBOB ENERGY CORP	BURCH KEELY UNIT	093	S:19, T:17S, R:30E	1.59	5.00	Jan 1972	1.77	8.29	Dec 1977	
30-015-04205	MARBOB ENERGY CORP	BURCH KEELY UNIT	093	S:19, T:17S,	1.36	8.39	Jan 1979	0.47	5.80	Jun 1986	

		UNIT		R:30E									
30-015-04206	MARBOB ENERGY CORP	BURCH KEELY UNIT	103	S:19, T:17S, R:30E	4.43	9.00	Jan 1973	16.81	42.74	Dec 1977			
30-015-04206	MARBOB ENERGY CORP	BURCH KEELY UNIT	103	S:19, T:17S, R:30E	9.21	27.50	Jan 1979	0.42	2.06	May 2001			
30-015-04209	MARBOB ENERGY CORP	BURCH KEELY UNIT	097	S:19, T:17S, R:30E			Jan 2001			May 2007			
30-015-04210	MARBOB ENERGY CORP	BURCH KEELY UNIT	104	S:19, T:17S, R:30E	1.79	0.18	Jan 1993			May 2007			
30-015-04211	MARBOB ENERGY CORP	BURCH KEELY UNIT	105	S:19, T:17S, R:30E	0.00	0.00	Jul 1994			May 2007			
30-015-04212	MARBOB ENERGY CORP	BURCH KEELY UNIT	102	S:19, T:17S, R:30E	14.75	21.11	Jan 1979			May 2007			
30-015-04212	MARBOB ENERGY CORP	BURCH KEELY UNIT	102	S:19, T:17S, R:30E	1.93	4.68	Jan 1973	14.84	40.84	Dec 1977			
30-015-04213	MARBOB ENERGY CORP	BURCH KEELY UNIT	100	S:19, T:17S, R:30E	2.18	3.68	Jan 1979			May 2007			
30-015-04213	MARBOB ENERGY CORP	BURCH KEELY UNIT	100	S:19, T:17S, R:30E	2.83	5.31	Jan 1972	2.23	7.13	Dec 1977			
30-015-20794	MARBOB ENERGY CORP	BURCH KEELY UNIT	101	S:19, T:17S, R:30E	2.39	4.61	Jan 1993	2.87	7.50	Sep 1996			
30-015-21268	MARBOB ENERGY CORP	BURCH KEELY UNIT	051	S:19, T:17S, R:30E	2.21	5.61	Jan 1993	2.29	6.48	May 2007			
30-015-21366	MARBOB ENERGY CORP	BURCH KEELY UNIT	098	S:19, T:17S, R:30E	7.04	80.61	Jan 1993			May 2007			
30-015-21657	MARBOB ENERGY CORP	BURCH KEELY UNIT	055	S:19, T:17S, R:30E	1.18	14.32	Jan 1993	1.23	16.61	May 2007			
30-015-22091	MARBOB ENERGY CORP	BURCH KEELY UNIT	053	S:19, T:17S, R:30E	2.54	19.43	Jan 1993	2.61	22.58	May 2007			
30-015-22092	MARBOB ENERGY CORP	BURCH KEELY UNIT	094	S:19, T:17S, R:30E	1.71	51.04	Jan 1993	2.10	82.17	Sep 1996			
30-015-25796	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP UNIT	010	S:19, T:17S, R:30E	2.00	321.68	Jan 1989		0.16	May 2007			
30-015-27645	MARBOB ENERGY CORP	BURCH KEELY UNIT	225	S:19, T:17S, R:30E	29.58	36.06	Jun 1994	8.97	28.61	May 2007			
30-015-27646	MARBOB ENERGY CORP	BURCH KEELY UNIT	242	S:19, T:17S, R:30E	96.33	63.97	Oct 1994	0.90	3.94	May 2007		2	
30-015-27769	MARBOB ENERGY CORP	BURCH KEELY UNIT	220	S:19, T:17S, R:30E	57.50	93.40	May 1994	13.48	76.61	May 2007		1	
30-015-28018	MARBOB ENERGY CORP	BURCH KEELY UNIT	239	S:19, T:17S, R:30E	75.83	34.43	Oct 1994	13.48	37.52	May 2007		2	

30-015-28089	MARBOB ENERGY CORP	BURCH KEELY UNIT	244	S:19, T:17S, R:30E	71.81	89.81	Nov 1994	18.81	21.71	May 2007	1
30-015-28144	MARBOB ENERGY CORP	BURCH KEELY UNIT	250	S:19, T:17S, R:30E	19.27	28.90	Oct 1995	31.39	168.97	May 2007	
30-015-28145	MARBOB ENERGY CORP	BURCH KEELY UNIT	231	S:19, T:17S, R:30E	63.00	20.55	Jun 1996	5.35	8.39	May 2007	1
30-015-28155	MARBOB ENERGY CORP	BURCH KEELY UNIT	229	S:19, T:17S, R:30E	8.90	16.26	Jul 1996	20.61	117.32	May 2007	
30-015-28156	MARBOB ENERGY CORP	BURCH KEELY UNIT	245	S:19, T:17S, R:30E	67.20	119.90	May 1995	5.35	16.00	May 2007	2
30-015-28330	MARBOB ENERGY CORP	BURCH KEELY UNIT	246	S:19, T:17S, R:30E	50.84	57.29	Nov 1995	14.32	193.74	May 2007	1
30-015-28331	MARBOB ENERGY CORP	BURCH KEELY UNIT	238	S:19, T:17S, R:30E	25.68	11.29	Jul 1996	11.58	11.45	May 2007	
30-015-28333	MARBOB ENERGY CORP	BURCH KEELY UNIT	262	S:19, T:17S, R:30E	30.03	12.45	Feb 1997	17.90	20.71	May 2007	
30-015-28335	MARBOB ENERGY CORP	BURCH KEELY UNIT	247	S:19, T:17S, R:30E	68.97	119.90	Oct 1995	10.71	43.19	May 2007	1
30-015-28887	MARBOB ENERGY CORP	BURCH KEELY UNIT	256	S:19, T:17S, R:30E	29.19	75.35	Sep 1996	6.39	71.94	May 2007	
30-015-29038	MARBOB ENERGY CORP	BURCH KEELY UNIT	265	S:19, T:17S, R:30E	20.90	29.93	Mar 1997	13.52	54.65	May 2007	
30-015-29510	MARBOB ENERGY CORP	BURCH KEELY UNIT	269	S:19, T:17S, R:30E	70.81	112.87	Jul 1997	17.03	51.32	May 2007	1
30-015-29512	MARBOB ENERGY CORP	BURCH KEELY UNIT	276	S:19, T:17S, R:30E	45.87	23.87	Nov 1997	4.77	24.58	May 2007	
30-015-29529	MARBOB ENERGY CORP	BURCH KEELY UNIT	270	S:19, T:17S, R:30E	52.87	63.06	Jul 1997	5.35	5.94	May 2007	
30-015-29722	MARBOB ENERGY CORP	BURCH KEELY UNIT	282	S:19, T:17S, R:30E	42.26	64.26	Feb 1998	14.32	12.84	May 2007	
30-015-29811	MARBOB ENERGY CORP	BURCH KEELY UNIT	274	S:19, T:17S, R:30E	37.32	22.74	Dec 1997	6.26	5.94	May 2007	
30-015-29821	MARBOB ENERGY CORP	BURCH KEELY UNIT	279	S:19, T:17S, R:30E	93.81	130.13	Dec 1997	1.39	2.42	May 2007	1
30-015-29929	MARBOB ENERGY CORP	BURCH KEELY UNIT	285	S:19, T:17S, R:30E	37.10	84.94	Feb 1998	1.77	1.19	May 2007	
30-015-30633	MARBOB ENERGY CORP	BURCH KEELY UNIT	304	S:19, T:17S, R:30E	14.77	50.63	Oct 2000	13.10	23.68	May 2007	
30-015-30704	MARBOB ENERGY CORP	BURCH KEELY UNIT	296Y	S:19, T:17S, R:30E	18.23	67.40	Aug 1999		1.19	May 2007	
30-015-32108	MARBOB ENERGY	BURCH KEELY	322	S:19, T:17S,	27.57	75.03	Mar 2002	33.16	91.77	May 2007	

	CORP	UNIT		R:30E						
30-015-32425	MARBOB ENERGY CORP	BURCH KEELY UNIT	328	S:19, T:17S, R:30E	88.32	58.06	Dec 2002	7.19	14.81	May 2007
30-015-30646	MARBOB ENERGY CORP	BURCH KEELY UNIT	296	S:19, T:17S, R:30E						
30-015-32916	MARBOB ENERGY CORP	BURCH KEELY UNIT	939	S:19, T:17S, R:30E	181.63	260.80	Oct 2003	15.23	26.65	May 2007
30-015-21657		BURCH A	055	S:19, T:17S, R:30E	8.82	193.86	Jan 1979	1.29	19.19	Dec 1993
30-015-21657		BURCH A	055	S:19, T:17S, R:30E	40.00	263.73	Mar 1976	11.87	191.65	Dec 1977
30-015-22091		BURCH A	053	S:19, T:17S, R:30E	28.00	146.42	Sep 1977	23.06	112.55	Dec 1977
30-015-22091		BURCH A	053	S:19, T:17S, R:30E	17.14	113.86	Jan 1979	2.77	26.06	Dec 1993
30-015-04200		BURCH AA FEDERAL	008	S:19, T:17S, R:30E	2.77	0.00	Feb 1951	0.32	4.77	Jul 1986
30-015-04201		BURCH A	052	S:19, T:17S, R:30E	2.68	16.61	Jan 1979	0.35	0.65	Dec 1993
30-015-04201		BURCH A	052	S:19, T:17S, R:30E	41.93	127.57	Jan 1974	3.58	16.42	Dec 1977
30-015-21268		BURCH A	051	S:19, T:17S, R:30E	6.25	96.89	Jan 1979	2.42	7.48	Dec 1993
30-015-21268		BURCH A	051	S:19, T:17S, R:30E	32.13	99.03	Dec 1974	8.42	95.81	Dec 1977
30-015-04195		BURCH A	060	S:19, T:17S, R:30E	4.00	11.03	Nov 1973	0.39	1.48	Dec 1977
30-015-04195		BURCH A	060	S:19, T:17S, R:30E	0.25	1.50	Jan 1979	0.00	0.06	Jan 1988
30-015-04207		BURCH A	023	S:19, T:17S, R:30E	28.43	0.00	Jan 1950	7.81	0.00	Dec 1956
30-015-04208		BURCH A	024	S:19, T:17S, R:30E	21.00	0.00	Jan 1950	8.58	0.00	Dec 1956
30-015-04197		BURCH A	005	S:19, T:17S, R:30E	38.18	0.00	Jan 1947	5.03	8.90	Dec 1962
30-015-04197		BURCH A	005	S:19, T:17S, R:30E						
30-015-04192		BURCH A	058	S:19, T:17S, R:30E	0.86	5.50	Jan 1979	4.23	5.03	Apr 1986
30-015-04192		BURCH A	058	S:19, T:17S, R:30E	1.39	4.29	Dec 1974	1.19	5.45	Dec 1977

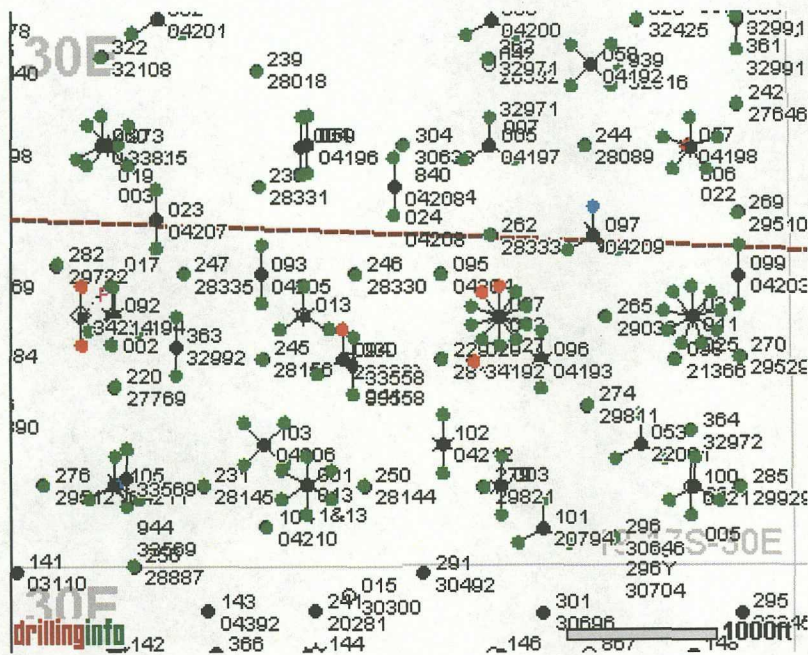
30-015-04209		BURCH A	097	S:19, T:17S, R:30E	0.21	1.36	Jan 1979	0.17	0.33	Jun 1986
30-015-04209		BURCH A	097	S:19, T:17S, R:30E	4.74	14.61	Dec 1974	0.26	1.35	Dec 1977
30-015-00000		BURCH A	031	S:19, T:17S, R:30E	5.50	41.89	Jan 1979	7.68	108.23	Dec 1993
30-015-00000		BURCH A	031	S:19, T:17S, R:30E	26.37	86.73	Oct 1974	7.45	41.39	Dec 1977
30-015-00000		BURCH A	097	S:19, T:17S, R:30E	0.00	158.00	Jan 1979	0.23	39.71	Dec 1993
30-015-00000		BURCH A	097	S:19, T:17S, R:30E	0.00	396.13	May 1975	0.00	227.61	Dec 1977
30-015-22092		BURCH A	094	S:19, T:17S, R:30E	18.39	56.93	Jan 1979	1.90	68.42	Dec 1993
30-015-22092		BURCH A	094	S:19, T:17S, R:30E	30.00	73.23	Sep 1977	24.74	56.29	Dec 1977
30-015-04194		BURCH A	092	S:19, T:17S, R:30E	0.07	0.21	Jan 1979	0.45	1.16	Jul 1986
30-015-04194		BURCH A	092	S:19, T:17S, R:30E	4.00	6.68	Jan 1970	0.06	0.19	Dec 1977
30-015-00000		BURCH B	006	S:19, T:17S, R:30E	39.29	0.00	Jan 1947	0.77	0.43	Jun 1986
30-015-00000		BURCH B	006	S:19, T:17S, R:30E	2.75	0.00	Jan 1959	1.29	1.00	Dec 1977
30-015-04206		BURCH B	103	S:19, T:17S, R:30E	4.57	4.07	Jan 1979	0.61	2.45	Dec 1993
30-015-04206		BURCH B	103	S:19, T:17S, R:30E	7.65	16.42	Dec 1974	7.65	6.32	Dec 1977
30-015-20794		BURCH C	101	S:19, T:17S, R:30E	5.25	9.86	Jan 1979	2.61	6.23	Dec 1993
30-015-20794		BURCH C	101	S:19, T:17S, R:30E	13.43	28.60	Mar 1976	5.42	19.06	Dec 1977
30-015-32915	MARBOB ENERGY CORP	BURCH KEELY UNIT	357	S:19, T:17S, R:30E	127.06	211.58	Dec 2003	10.81	43.74	May 2007
30-015-32970	MARBOB ENERGY CORP	BURCH KEELY UNIT	360	S:19, T:17S, R:30E	85.65	119.71	Feb 2004	8.97	35.52	May 2007
30-015-32971	MARBOB ENERGY CORP	BURCH KEELY UNIT	362	S:19, T:17S, R:30E	170.23	270.74	Feb 2004	22.45	50.32	May 2007
30-015-32972	MARBOB ENERGY CORP	BURCH KEELY UNIT	364	S:19, T:17S, R:30E	58.63	60.67	Mar 2004	1.77	1.19	May 2007
30-015-32991	MARBOB ENERGY	BURCH KEELY	361	S:19, T:17S,	97.30	141.20	Mar 2004	4.52	6.90	May 2007

	CORP	UNIT		R:30E							
30-015-32969	MARBOB ENERGY CORP	BURCH KEELY UNIT	359	S:19, T:17S, R:30E	109.40	135.57	Mar 2004	15.26	48.35	May 2007	
30-015-33569	MARBOB ENERGY CORP	BURCH KEELY UNIT	944	S:19, T:17S, R:30E	46.42	235.29	Jul 2005	2.68	16.00	May 2007	
30-015-33558	MARBOB ENERGY CORP	BURCH KEELY UNIT	941	S:19, T:17S, R:30E	100.19	102.32	Feb 2005	12.39	15.16	May 2007	
30-015-33815	MARBOB ENERGY CORP	BURCH KEELY UNIT	973	S:19, T:17S, R:30E	102.90	127.26	Feb 2006	35.00	78.94	May 2007	
30-015-33816	MARBOB ENERGY CORP	BURCH KEELY UNIT	974	S:19, T:17S, R:30E	70.39	103.23	Feb 2006	26.00	105.58	May 2007	
30-015-33558	MARBOB ENERGY CORP	BURCH KEELY UNIT	941	S:19, T:17S, R:30E							
30-015-32992	MARBOB ENERGY CORP	BURCH KEELY UNIT	363	S:19, T:17S, R:30E	91.48	387.13	Apr 2005	11.68	56.03	May 2007	
30-015-00000	PRORATION UNIT G-1	BURCH A	002	S:19, T:17S, R:30E	16.18	0.00	Jan 1947	1.97	9.26	Dec 1963	
30-015-00000	PRORATION UNIT G-1	BURCH	019	S:19, T:17S, R:30E	3.89	0.00	Jan 1955	3.29	0.00	Dec 1955	
30-015-00000	PRORATION UNIT G-1	BURCH A	004	S:19, T:17S, R:30E	37.18	0.00	Jan 1947	2.97	1.23	Dec 1963	
30-015-00000	PROPATION UNIT G-1	BURCH A	006	S:19, T:17S, R:30E	15.18	0.00	Jan 1947	5.00	2.03	Dec 1963	
30-015-00000	PROPATION UNIT G-1	BURCH A	007	S:19, T:17S, R:30E	19.18	0.00	Jan 1947	5.00	2.03	Dec 1963	
30-015-00000	PROPATION UNIT G-1	BURCH A	007	S:19, T:17S, R:30E	3.82	0.00	Jan 1955	3.90	0.00	Dec 1955	
30-015-00000	PROPATION UNIT G-1	BRUCH A	010	S:19, T:17S, R:30E	2.18	0.00	Jan 1947	0.52	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BRUCH A	011	S:19, T:17S, R:30E	10.64	0.00	Jan 1949	3.00	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BRUCH A	012	S:19, T:17S, R:30E	17.86	0.00	Jan 1949	8.52	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BURCH A	013	S:19, T:17S, R:30E	29.00	0.00	Jan 1948	3.71	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BRUCH A	022	S:19, T:17S, R:30E	17.77	0.00	Feb 1950	11.00	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BURCH A	025	S:19, T:17S, R:30E	10.23	0.00	Dec 1949	3.00	0.00	Dec 1957	
30-015-00000	PROPATION UNIT G-1	BURCH A	027	S:19, T:17S, R:30E	3.50	0.00	Jan 1951	6.06	0.00	Dec 1957	

30-015-00000	PRORATION UNIT G-1	BURCH A	027	S:19, T:17S, R:30E	13.37	0.00	Aug 1950	11.97	0.00	Dec 1955
30-015-00000	PRORATION UNIT G-2	BURCH B	001	S:19, T:17S, R:30E	28.93	0.00	Jan 1948	3.19	0.00	Dec 1957
30-015-00000	PRORATION UNIT G-2	BURCH B	013	S:19, T:17S, R:30E	19.73	0.00	Oct 1948	5.13	7.74	Dec 1962
30-015-00000	PRORATION UNIT W-1	BURCH "C"	003	S:19, T:17S, R:30E	4.52	0.00	Feb 1951	2.35	3.39	Dec 1971
30-015-00000	PRORATION UNIT W-1	BURCH "C"	005	S:19, T:17S, R:30E	16.29	0.00	Jan 1947	3.03	4.35	Dec 1971
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	003	S:19, T:17S, R:30E	11.18	0.00	Jan 1947	5.81	3.26	Dec 1964
30-015-04200	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	008	S:19, T:17S, R:30E	1.00	0.00	Jan 1956	0.16	0.00	Dec 1956
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	009	S:19, T:17S, R:30E	4.18	0.00	Jan 1947	2.35	0.00	Dec 1956
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	010	S:19, T:17S, R:30E	0.00	0.00	Jan 1951	1.00	0.42	Dec 1963
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	011	S:19, T:17S, R:30E	10.21	0.00	Jan 1947	2.77	0.10	Dec 1963
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	012	S:19, T:17S, R:30E	23.21	0.00	Jan 1947	5.03	23.71	Dec 1963
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	013	S:19, T:17S, R:30E	26.18	0.00	Jan 1947	7.23	27.19	Dec 1962
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	022	S:19, T:17S, R:30E	8.10	0.00	Jan 1952	13.32	23.65	Dec 1962
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	025	S:19, T:17S, R:30E	8.03	0.00	Jan 1952	3.97	1.61	Dec 1963
30-015-00000	GEN AMERICAN PRORATE UNIT G1 ORDER 791	BURCH A FED	027	S:19, T:17S, R:30E	13.00	0.00	Jan 1952	4.71	0.19	Dec 1963
30-015-00000	GEN AMERICAN PRORATE	BURCH B FED	001	S:19, T:17S, R:30E	2.28	0.00	Jan 1952	3.00	0.00	Dec 1963
30-015-00000	prorotation unit g-5	BURCH C	005	S:19, T:17S, R:30E	30.83	0.00	Jan 1948	10.06	0.00	Dec 1953
30-015-00000	proration unit w-1	BURCH C	005	S:19, T:17S, R:30E	17.75	0.00	Jan 1951	13.32	0.00	Dec 1956
30-015-00000	PRORATION UNIT G-2	BURCH B	013	S:19, T:17S, R:30E	6.69	0.00	Jan 1952	5.80	7.27	Apr 1969
30-015-00000	GRAYBURG OIL CO.	BURCH B	1&13	S:19, T:17S, R:30E	28.11	0.00	Jan 1947	29.06	0.00	Dec 1947
30-015-04197	PRORATION UNIT	BURCH A	005	S:19, T:17S,	44.00	0.00	Jan 1948	14.10	0.00	Dec 1953

	G-1			R:30E						
30-015-00000	PRORATION UNIT G-1	BURCH A	004	S:19, T:17S, R:30E	9.64	0.00	Jan 1949	10.61	0.00	Dec 1949
30-015-00000	PRORATION UNIT G-1	BURCH A	007	S:19, T:17S, R:30E	16.75	0.00	Jan 1949	15.65	0.00	Dec 1949
30-015-04207	PRORATION UNIT G-1	BURCH A	023	S:19, T:17S, R:30E	30.87	0.00	Jun 1949	2.57	0.00	Sep 1957
30-015-04208	PRORATION UNIT G-1	BURCH A	024	S:19, T:17S, R:30E	34.93	0.00	Mar 1949	3.00	0.00	Sep 1957
30-015-00000	PRORATION UNIT G-2	BURCH B	006	S:19, T:17S, R:30E	30.62	0.00	Jan 1948	3.19	0.00	Dec 1957
30-015-00000	GRAYBURG OIL CO.	BURCH A	003	S:19, T:17S, R:30E	12.97	0.00	Jan 1948	2.71	0.00	Dec 1957
30-015-04200	GRAYBURG OIL CO.	BURCH A	008	S:19, T:17S, R:30E	1.64	0.00	Jan 1953	0.45	0.00	Jul 1957
30-015-00000	GRAYBURG OIL CO.	BURCH A	009	S:19, T:17S, R:30E	5.10	0.00	Jan 1948	0.83	0.00	Sep 1957
30-015-00000	GRAYBURG OIL CO.	BURCH A	010	S:19, T:17S, R:30E	5.93	0.00	Jan 1948	4.97	0.00	Dec 1948
30-015-00000	GRAYBURG OIL CO.	BURCH A	011	S:19, T:17S, R:30E	10.83	0.00	Jan 1948	9.39	0.00	Dec 1948
30-015-00000	GRAYBURG OIL CO.	BURCH A	012	S:19, T:17S, R:30E	20.79	0.00	Jan 1948	16.81	0.00	Dec 1948
30-015-00000	WESTERN PROD. CO.	BURCH C	003	S:19, T:17S, R:30E	5.96	0.00	Jan 1953	3.68	2.42	Dec 1965
30-015-33569	MARBOB ENERGY CORP	BURCH KEELY UNIT	944	S:19, T:17S, R:30E						
30-015-00000	GEN. AMERICAN	BURCH A	022	S:19, T:17S, R:30E	16.86	6.34	Jan 1964	14.29	42.61	May 1969
30-015-00000	GEN. AMERICAN	BURCH A	025	S:19, T:17S, R:30E	3.97	1.48	Jan 1964	5.87	18.00	Apr 1969
30-015-00000	GEN. AMERICAN	BURCH A	027	S:19, T:17S, R:30E	4.76	6.17	Jan 1964	5.03	15.47	Apr 1969
30-015-00000	GEN. AMERICAN	BURCH B	001	S:19, T:17S, R:30E	3.00	5.48	Jan 1964	4.84	1.94	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	002	S:19, T:17S, R:30E	0.66	12.31	Jan 1960	1.81	5.00	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	003	S:19, T:17S, R:30E	3.82	5.43	Jan 1965	2.10	7.06	Jul 1971
30-015-00000	GEN. AMERICAN	BURCH A	004	S:19, T:17S, R:30E	28.21	15.66	Jan 1960	1.43	0.90	Apr 1964

30-015-00000	GEN. AMERICAN	BURCH A	006	S:19, T:17S, R:30E	6.34	42.72	Jan 1960	6.87	19.06	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	007	S:19, T:17S, R:30E	7.34	68.93	Jan 1960	3.65	10.10	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	010	S:19, T:17S, R:30E	0.97	0.38	Jan 1964	1.71	0.00	Dec 1966
30-015-00000	GEN. AMERICAN	BURCH A	011	S:19, T:17S, R:30E	2.97	3.83	Jan 1964	3.19	8.87	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	012	S:19, T:17S, R:30E	5.34	6.90	Jan 1964	2.74	7.61	Dec 1971
30-015-00000	GEN. AMERICAN	BURCH A	013	S:19, T:17S, R:30E	7.55	26.76	Jan 1964	1.81	5.00	Dec 1971
30-015-34192	GRUY PETROLEUM MANAGEMENT CO.	GRAYBURG DEEP	020	S:19, T:17S, R:30E						
30-015-34214	GRUY PETROLEUM MANAGEMENT CO.	GRAYBURG DEEP	017	S:19, T:17S, R:30E						
30-015-32992	MARBOB ENERGY CORP	BURCH KEELY UNIT	363	S:19, T:17S, R:30E	91.48	387.13	Apr 2005	28.79	105.54	Feb 2007
30-015-34214	CONOCOPHILLIPS COMPANY	GRAYBURG DEEP	017	S:19, T:17S, R:30E	35.00	2,804.68	Jan 2006		209.97	May 2007
30-015-35441	MARBOB ENERGY CORP	BURCH KEELY UNIT	403	S:19, T:17S, R:30E			May 2007	26.68	184.81	May 2007
30-015-35441	MARBOB ENERGY CORP	BURCH KEELY UNIT	403	S:19, T:17S, R:30E						



[illegible]

Brooks, David K., EMNRD

From: Phyllis Edwards [PEdwards@conchoresources.com]
Sent: Thursday, October 04, 2007 11:13 AM
To: Brooks, David K., EMNRD
Subject: RE: Continental A State No. 13 and State S-19#33

David,

I will get you the required information – thanks for your help !!!

Also, will these wells require simultaneous dedication, and if so, do you need anything from COG ?

Continental A State #13

1650 FNL & 330 FWL Section 30, T17S, R29E Lot 2

Continental A State # 9

2310 FNL & 580 FWL API 30-015-32302
 Section 30, T17S, R29E Lot 2

State S-19 #33

1650 FSL & 1250 FWL Section 19, T17S, R29E Lot 3

State S-19 #19

2310 FSL & 550 FWL API 30-015-35242
 Section 19, T17S, R29E Lot 3

Thanks,

Phyllis Edwards

COG Operating LLC

Fasken Tower II

550 W. Texas Avenue, Suite 1300

Midland, TX 79701

432-685-4340 P

432-685-4399 F

pedwards@conchoresources.com

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]

Sent: Thursday, October 04, 2007 12:50 PM

To: Phyllis Edwards

Subject: Continental A State No. 13 and State S-19#33

Phyllis

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

I realize that Rule 1210A(3) only requires notice to owners of tracts within the quarter/quarter section that are omitted from the unit, of which there are none. However, Rule 104.D(2)(b) allows the Director to grant exceptions for whole subdivisions having less than 70% of the normal acreage "after notice and opportunity for hearing." If no notice requirement other than that specified in Rule 1210.A(3) applied, the rules would be contradictory. And it absolutely makes sense to require notice to offsets in these cases because your application will permit you to drill

10/4/2007

up to 4 wells on 27 acres. I note that Rule 1210.A(3) requires notice to other persons as the Division requires.

Please provide notice of these applications to offsetting operators (or working interest owners, as applicable) and furnish us proof of notice. I am coding these applications "returned to operator", but will retain the materials furnished, in anticipation that they will be revived when proof of notice is furnished.

Separately, I note that the State S-19 #33 will also require an NSL approval, since it is located less than 330 feet from the east unit boundary. No notice is required for the NSL, however. Accordingly, I am treating your application as to this well as including application for an NSL approval, and I will proceed to issue the NSL approval, subject to approval of the unit after receipt of proof of notice.

Please call me if you have questions.

David K. Brooks
Legal Examiner
505-476-3450

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This inbound email has been scanned by the MessageLabs Email Security System.

10/4/2007

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, October 04, 2007 2:18 PM
To: 'Phyllis Edwards'
Subject: RE: Continental A State No. 13 and State S-19#33

Phyllis

Simultaneous dedication approval will not be required unless there are to be more than four wells producing from the same pool on the same quarter/quarter section. My understanding is that that will not be the case with either of these proposed units.

David

From: Phyllis Edwards [mailto:PEdwards@conchoresources.com]
Sent: Thursday, October 04, 2007 11:13 AM
To: Brooks, David K., EMNRD
Subject: RE: Continental A State No. 13 and State S-19#33

David,

I will get you the required information – thanks for your help !!!

Also, will these wells require simultaneous dedication, and if so, do you need anything from COG ?

Continental A State #13		
1650 FNL & 330 FWL	Section 30, T17S, R29E	Lot 2
Continental A State # 9	API 30-015-32302	
2310 FNL & 580 FWL	Section 30, T17S, R29E	Lot 2
State S-19 #33		
1650 FSL & 1250 FWL	Section 19, T17S, R29E	Lot 3
State S-19 #19	API 30-015-35242	
2310 FSL & 550 FWL	Section 19, T17S, R29E	Lot 3

Thanks,
Phyllis Edwards
 COG Operating LLC
 Fasken Tower II
 550 W. Texas Avenue, Suite 1300
 Midland, TX 79701
 432-685-4340 P
 432-685-4399 F
 pedwards@conchoresources.com

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]

10/4/2007

Sent: Thursday, October 04, 2007 12:50 PM
To: Phyllis Edwards
Subject: Continental A State No. 13 and State S-19#33

Phyllis

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

I realize that Rule 1210A(3) only requires notice to owners of tracts within the quarter/quarter section that are omitted from the unit, of which there are none. However, Rule 104.D(2)(b) allows the Director to grant exceptions for whole subdivisions having less than 70% of the normal acreage "after notice and opportunity for hearing." If no notice requirement other than that specified in Rule 1210.A(3) applied, the rules would be contradictory. And it absolutely makes sense to require notice to offsets in these cases because your application will permit you to drill up to 4 wells on 27 acres. I note that Rule 1210.A(3) requires notice to other persons as the Division requires.

Please provide notice of these applications to offsetting operators (or working interest owners, as applicable) and furnish us proof of notice. I am coding these applications "returned to operator", but will retain the materials furnished, in anticipation that they will be revived when proof of notice is furnished.

Separately, I note that the State S-19 #33 will also require an NSL approval, since it is located less than 330 feet from the east unit boundary. No notice is required for the NSL, however. Accordingly, I am treating your application as to this well as including application for an NSL approval, and I will proceed to issue the NSL approval, subject to approval of the unit after receipt of proof of notice.

Please call me if you have questions.

David K. Brooks
Legal Examiner
505-476-3450

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This inbound email has been scanned by the MessageLabs Email Security System.

10/4/2007

Brooks, David K., EMNRD

From: Jones, William V., EMNRD
Sent: Tuesday, October 02, 2007 9:58 AM
To: Phyllis Edwards
Cc: Brooks, David K., EMNRD
Subject: RE: NSP & SD on 2 wells

Phyllis:

I am passing this on to David Brooks as he is now a member of the Engineering Bureau at OCD and is handling this type of application.

Regards,

William V. Jones PE
New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, NM 87505
505-476-3448

From: Phyllis Edwards [mailto:PEdwards@conchoresources.com]
Sent: Tuesday, October 02, 2007 10:11 AM
To: Jones, William V., EMNRD
Subject: NSP & SD on 2 wells

Will,

On 9-6-07, I submitted a NSP applications for 2 Eddy County Wells:

Continental A State #13	1650' FNL & 330' FWL	Sec 30, T17S, R30E, Lot 2
State S-19 #33	1650' FNL & 1250' FWL	Sec 19, T17S, R29E, Lot 3

I wondered how the application process was going, & if you needed anything else from COG.

I believe I need to apply for SD for these wells also. I am not sure what to submit with this application – can you give me an idea? Should I wait until the NSP has been approved before submitting the SD application – or submit it now?

If you are not the person who is working on this, please let me know who I need to contact regarding these matters.

You know the word around our company is DRILL, DRILL, DRILL – so I am trying to do my part to make that happen, so I appreciate your taking the time to read this e-mail !!!

Phyllis Edwards

COG Operating LLC

10/2/2007

Phyllis Edwards

TO :
DAVID BROOKS

From: Phyllis Edwards
Sent: Thursday, October 04, 2007 1:02 PM
To: Brent Robertson; Stuart Dirks
Subject: FW: Continental A State No. 13 and State S-19#33

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2007 OCT 26 PM 3 30

Brent / Stuart,

Please let me know who I need to send notices to – thanks !!!

Phyllis Edwards

COG Operating LLC
Fasken Tower II
550 W. Texas Avenue, Suite 1300
Midland, TX 79701
432-685-4340 P
432-685-4399 F
pedwards@conchoresources.com

DAVID:

AS YOU REQUESTED.

THANKS!

From: Brooks, David K., EMNRD [mailto:david.brooks@state.nm.us]
Sent: Thursday, October 04, 2007 12:50 PM
To: Phyllis Edwards
Subject: Continental A State No. 13 and State S-19#33

Phyllis

It appears that these Non-Standard Proration Unit applications will require notice to the working interest owners in the offsetting units to the west (in 17S-28E).

I realize that Rule 1210A(3) only requires notice to owners of tracts within the quarter/quarter section that are omitted from the unit, of which there are none. However, Rule 104.D(2)(b) allows the Director to grant exceptions for whole subdivisions having less than 70% of the normal acreage "after notice and opportunity for hearing." If no notice requirement other than that specified in Rule 1210.A(3) applied, the rules would be contradictory. And it absolutely makes sense to require notice to offsets in these cases because your application will permit you to drill up to 4 wells on 27 acres. I note that Rule 1210.A(3) requires notice to other persons as the Division requires.

Please provide notice of these applications to offsetting operators (or working interest owners, as applicable) and furnish us proof of notice. I am coding these applications "returned to operator", but will retain the materials furnished, in anticipation that they will be revived when proof of notice is furnished.

Separately, I note that the State S-19 #33 will also require an NSL approval, since it is located less than 330 feet from the east unit boundary. No notice is required for the NSL, however. Accordingly, I am treating your application as to this well as including application for an NSL approval, and I will proceed to issue the NSL approval, subject to approval of the unit after receipt of proof of notice.

Please call me if you have questions.

David K. Brooks
Legal Examiner
505-476-3450

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**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

B P American Production Company
P O Box 3092
Houston, TX 77253-3092

Re: Request for Unorthodox Well Location

To Whom It May Concern:

This letter will serve as notice under Rule 104.F (3) that COG Operating LLC has requested administrative approval from the Oil Conservation Division in Santa Fe, NM for a Non-standard spacing Empire: GLORIETA-YESO oil well.

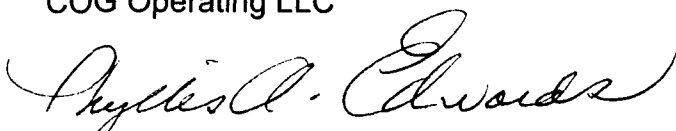
**STATE S-19 #33
Eddy County, NM**

1650' FNL & 1250' FWL Sec 19, T17S, R29E

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may allow COG to produce from the unorthodox location after the well is drilled, if no objection has been made within the 20 days after the application has been received.

Sincerely,

COG Operating LLC

A handwritten signature in black ink, appearing to read "Phyllis A. Edwards". The signature is fluid and cursive, with the first name "Phyllis" being more prominent.

Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Dominion Oklahoma Texas
Exploration & Production Inc.
14000 Quail Spring Parkway, Suite 1600
Oklahoma City, OK 73134

Re: Request for Unorthodox Well Location

To Whom It May Concern:

This letter will serve as notice under Rule 104.F (3) that COG Operating LLC has requested administrative approval from the Oil Conservation Division in Santa Fe, NM for a Non-standard spacing Empire: GLORIETA-YESO oil well.

**STATE S-19 #33
Eddy County, NM**

1650' FNL & 1250' FWL Sec 19, T17S, R29E

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may allow COG to produce from the unorthodox location after the well is drilled, if no objection has been made within the 20 days after the application has been received.

Sincerely,

COG Operating LLC

A handwritten signature in cursive script that reads "Phyllis A. Edwards".

Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Marathon Oil Company
P O Box 3128
Houston, TX 77210-3128

Re: Request for Unorthodox Well Location

To Whom It May Concern:

This letter will serve as notice under Rule 104.F (3) that COG Operating LLC has requested administrative approval from the Oil Conservation Division in Santa Fe, NM for a Non-standard spacing Empire: GLORIETA-YESO oil well.

**STATE S-19 #33
Eddy County, NM**

1650' FNL & 1250' FWL Sec 19, T17S, R29E

Should your company have any objection, it must be filed in writing within twenty (20) days from the date of this notice. The Division Director may allow COG to produce from the unorthodox location after the well is drilled, if no objection has been made within the 20 days after the application has been received.

Sincerely,

COG Operating LLC

A handwritten signature in cursive script, reading "Phyllis A. Edwards".

Phyllis A. Edwards
Regulatory Analyst

**COG OPERATING LLC
550 W. TEXAS, SUITE 1300
MIDLAND, TX 79701**

October 10, 2007

Yates Petroleum Corporation
105 South Fourth Street
Artesia, NM 88210

Re: Request for Unorthodox Well Location

To Whom It May Concern:

This letter will serve as notice under Rule 104.F (3) that COG Operating LLC has requested administrative approval from the Oil Conservation Division in Santa Fe, NM for a Non-standard spacing Empire: GLORIETA-YESO oil well.

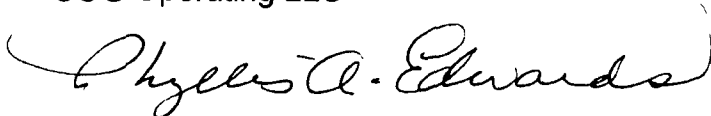
**STATE S-19 #33
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Sincerely,

COG Operating LLC

A handwritten signature in black ink, reading "Phyllis A. Edwards". The signature is written in a cursive style with a large, looping initial "P".

Phyllis A. Edwards
Regulatory Analyst

SENDER: COMPLETE THIS SECTION ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		COMPLETE THIS SECTION ON DELIVERY A. Signature ☐ Agent ☐ Addressee X <i>Calley</i> B. Received by (Printed Name) ☐ Addressee OCT 18 2004 C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
1. Article Addressed to: B P American Production Co P O Box 3092 Houston, TX 77253-3092		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☒ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes	
2. Article Number (Transfer from service label) 7005 0390 0000 6041 6160 PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540			

SENDER: COMPLETE THIS SECTION ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		COMPLETE THIS SECTION ON DELIVERY A. Signature ☐ Agent ☐ Addressee X <i>Alanna</i> B. Received by (Printed Name) ☐ Addressee C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
1. Article Addressed to: Dominion Oklahoma Texas Exploration & Production Inc. 14000 Quail Spring Parkway, Oklahoma City, OK 73134 Suite 1600		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☒ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes	
2. Article Number (Transfer from service label) 7005 0390 0000 6041 6203 PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540			

SENDER: COMPLETE THIS SECTION ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		COMPLETE THIS SECTION ON DELIVERY A. Signature ☐ Agent ☐ Addressee X <i>GEE</i> B. Received by (Printed Name) ☐ Addressee OCT 12 2004 C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
1. Article Addressed to: Marathon Oil Company P O Box 3128 Houston, TX 77210-3128		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☒ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes	
2. Article Number (Transfer from service label) 7005 0390 0000 6041 6197 PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540			

SENDER: COMPLETE THIS SECTION ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		COMPLETE THIS SECTION ON DELIVERY A. Signature ☐ Agent ☐ Addressee X <i>Kathy Donaghe</i> B. Received by (Printed Name) ☐ Addressee C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
1. Article Addressed to: Yates Petroleum Corporation 105 South Fourth Street Artesia, NM 88210		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☒ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes	
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