KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

W. THOMAS KELLAHIN KAREN AUBREY

CANDACE HAMANN CALLAHAN

JASON KELLAHIN OF COUNSEL

December 10, 1990

SANTA FE, NEW MEXICO 87504-2265

New Mexico Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87501

Attn: Mr. Michael E. Stogner

Re: Avon Energy Corporation Administrative Application for Unorthodox Well Location in a Leasehold Waterflood Project, Turner "B" Federal Well No. 89 OIL CONSERVATIO

Dear Mr. Stogner:

On behalf of Avon Energy Corporation, successor to Socorro Petroleum Company, as operator of the Turner "B" leasehold waterflood project previously approved by Division Order R-3528 (copy enclosed) we request administrative approval of the following unorthodox well location:

> Turner "B" Federal Well No. 89 Unit C, Section 29, T17S, R31E Eddy County, New Mexico Location: 30 feet FNL and 1350 feet FWL

The Turner "B" leasehold waterflood project is currently being developed with infill wells using a 20-acre well density. The subject well is one of those wells and is proposed for the interior of the unit and is not competitive with offsetting wells outside the unit.

We have enclosed a copy of a plat showing the boundary of the waterflood. Also enclosed is a copy of the Form C-101 and C-102.

New Mexico Oil Conservation Division December 10, 1990 Page 2

The operator believes that the infill development using the 20-acre density will improve waterflood seep efficiency and will increase secondary oil recovery.

Because the well is not located within 330 feet to any other boundary, we believe no notification to offsetting operators is required.

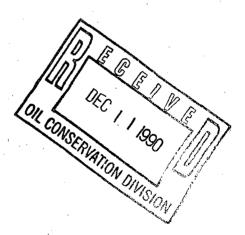
Avon proposes to commence the well as soon as possible and would appreciate your assistance in processing this request. Please call me if you need any further information or have any questions.

Very truly yours,

W. Thomas Kellahin

WTK/tic Enclosures

cc: Mr. T. M. Hatfield
BHI Energy Corporation
1153 Dairy Ashford, Suite 803
Houston, Texas 77079



Form 3160-3 (November 1983) (formerly 9-331C)

CONDITIONS OF APPROVAL, IF ANY:

UNITED STATES

SUBMIT IN TRIPLICATE* (Other instructions on reverse side)

Form approved. Budget Bureau No. 1004-0136 Expires August 31, 1985

Marie Land

(Totaletty 5—001C)	DEPARTMENT	OF THE INTE	RIOR	·		,
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3. ADDRESS OF OPERATOR	AVON ENERGY CO			******		
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7-7/8"	5-1/2"	15.5# K-55		200	sx Class C + 60	00 sx Lite
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PERMIT NO.		•	APPROVAL DATE			
APPROVED BY		TITLE			DATE	

Form C-102 Revised 1-1-89

OIL CONSERVATION DIVISION P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT II P.O. Drawer DD, Artesia, NM 88210

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section

Operator	_		•	Lease	!! 7> !!	D - J	1	We	II No.	89
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BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE No. 3885 Order No. R-3528

APPLICATION OF SINCLAIR OIL & GAS COMPANY FOR A WATERFLOOD EXPANSION, EDDY COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on October 9, 1968, at Santa Fe, New Mexico, before Examiner Elvis A. Utz.

NOW, on this 22nd day of October, 1968, the commission, a quorum being present, having considered the testimony the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Sinclair Oil Corporation, formerly Sinclair Oil & Gas Company, seeks permission to expand its Turner "B" Grayburg-Jackson Waterflood Project in the Grayburg-Jackson Pool by the injection of water into the Premier Sand of the Grayburg formation through 12 additional injection wells in Sections 20, 29, and 30, Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico.
- (3) That the wells in the project area are in an advanced state of depletion and should properly be classified as "stripper" wells.
- (4) That the proposed expansion of the Turner "B" Grayburg-Jackson Waterflood Project should result in the recovery of otherwise unrecoverable oil, thereby preventing waste.

(5) That the subject application should be approved and the expanded project should be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.

IT IS THEREFORE ORDERED:

(1) That the applicant, Sinclair Oil Corporation, formerly Sinclair Oil & Gas Company, is hereby authorized to expand its Turner "B" Grayburg-Jackson Waterflood Project in the Grayburg-Jackson Pool by the injection of water into the Premier Sand of the Grayburg formation through the following-described wells in Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico:

LEASE		WELL	NO. UNI	T SECTION
Turner "B"	SP	44	N	20
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Turner "B"	SP	55	H	29
Turner "B"	SP	61	J	29 .
Turner "B"	SP	64	L	29
Turner "B"	SP	. 66	N	29
Turner "B"	SP	68	P	29
Turner "B"	SP	56	` J	30
Turner "B"	SP	76	P	30

- (2) That the expanded waterflood project shall be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.
- (3) That monthly progress reports of the expanded waterflood project herein authorized shall be submitted to the Commission in accordance with Rules 704 and 1120 of the Commission Rules and Regulations.
- (4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

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STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION

DAVID F. CARGO, Chairman

GUYTON B. HAYS, Member

TO THE STATE OF TH

SEAL

A. L. PORTER, Jr., Member & Secretary

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KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW
EL PATIO BUILDING
II7 NORTH GUADALUPE
POST OFFICE BOX 2265

SANTA FE. NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

CANDACE HAMANN CALLAHAN
JASON KELLAHIN

W THOMAS KELLAHIN

KAREN AUBREY

OF COUNSEL

December 10, 1990

New Mexico Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87501

Attn: Mr. Michael E. Stogner

Re: Avon Energy Corporation
Administrative Application for
Unorthodox Well Location in a
Leasehold Waterflood Project,
Turner "B" Federal Well No. 90

Dear Mr. Stogner:

On behalf of Avon Energy Corporation, successor to Socorro Petroleum Company, as operator of the Turner "B" leasehold waterflood project previously approved by Division Order R-3528 (copy enclosed) we request administrative approval of the following unorthodox well location:

Turner "B" Federal Well No. 90 Unit C, Section 29, T17S, R31E Eddy County, New Mexico Location: 75 feet FNL and 2610 feet FWL

The Turner "B" leasehold waterflood project is currently being developed with infill wells using a 20-acre well density. The subject well is one of those wells and is proposed for the interior of the unit and is not competitive with offsetting wells outside the unit.

We have enclosed a copy of a plat showing the boundary of the waterflood. Also enclosed is a copy of the Form C-101 and C-102.



New Mexico Oil Conservation Division December 10, 1990 Page 2

The operator believes that the infill development using the 20-acre density will improve waterflood seep efficiency and will increase secondary oil recovery.

Because the well is not located within 330 feet to any other boundary, we believe no notification to offsetting operators is required.

Avon proposes to commence the well as soon as possible and would appreciate your assistance in processing this request. Please call me if you need any further information or have any questions.

Very truly yours,

W. Thomas Kellahin

WTK/tic Enclosures

cc: Mr. T. M. Hatfield BHI Energy Corporation 1153 Dairy Ashford, Suite 803 Houston, Texas 77079



Form 3160-3 (November 1983) (formerly 9-331C)

SUBMIT IN TRIPLICATE*

Form approved. Budget Bureau No. 1004-0136 Expires August 31, 1985 (Other instructions on reverse side) UNITED STATES
DEPARTMENT OF THE INTERIOR 5. LEASE DESIGNATION AND BERIAL NO.

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	AUON ENERCY COR	DOD ATT ON	Ph	.915-683-5449		9. WELL NO.	
3. ADDRESS OF OPERATOR	AVON ENERGY COR	1910				90	
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4. LOCATION OF WELL (R	deport location clearly an	d in accordance wit	h any S	tate requirements.*)	-	Grayburg-Jackson	
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	Same					Sec.29-17S-31E	
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OR APPLIED FOR, ON TH		800 ' ±	1 3	3500 '	Rot	ary	
21. ELEVATIONS (Show wh	ether DF, RT, GR, etc.)					22. APPROX. DATE WORK WILL START*	
3689 GL	· .					As Soon As Possible	
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CONDITIONS OF APPROV	VAL, IF ANY:		rle			DATE	

Submit to Appropriate District Office State Lease - 4 copies Fee Lease - 3 copies

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-102 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT I P.O. Box 1980, Hobbs, NM 88240 DISTRICT II P.O. Drawer DD, Artesia, NM 88210

DISTRICT III 1000 Rio Brazos Rd., Aziec, NM 87410

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section

Operator AVC	on Energy	/ Corporat:	ion	Lease T	urner "I	3" Fedei	ral	Well No. 9 0
Unit Letter C	Section 29	Township	South	Range 3	1 East		County	ldy
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BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE No. 3885 Order No. R-3528

APPLICATION OF SINCLAIR OIL & GAS COMPANY FOR A WATERFLOOD EXPANSION, EDDY COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on October 9, 1968, at Santa Fe, New Mexico, before Examiner Elvis A. Utz.

NOW, on this 22nd day of October, 1968, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

 (2) That the applicant, Sinclair Oil Corporation, formerly
- (2) That the applicant, Sinclair Oil Corporation, formerly Sinclair Oil & Gas Company, seeks permission to expand its Turner "B" Grayburg-Jackson Waterflood Project in the Grayburg-Jackson Pool by the injection of water into the Premier Sand of the Grayburg formation through 12 additional injection wells in Sections 20, 29, and 30, Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico.
- (3) That the wells in the project area are in an advanced state of depletion and should properly be classified as "stripper" wells.
- (4) That the proposed expansion of the Turner "B" Grayburg-Jackson Waterflood Project should result in the recovery of otherwise unrecoverable oil, thereby preventing waste.

That the subject application should be approved and the expanded project should be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.

IT IS THEREFORE ORDERED:

(1) That the applicant, Sinclair Oil Corporation, formerly Sinclair Oil & Gas Company, is hereby authorized to expand its Turner "B" Grayburg-Jackson Waterflood Project in the Grayburg-Jackson Pool by the injection of water into the Premier Sand of the Grayburg formation through the following-described wells in Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico:

LEASE		WELL	NO.	UNIT	SECTION
Turner "B"	SP	44	. :	N	20
Turner "B"	SP	46		P.	20
Turner "B"	SP	47		В	29
Turner "B"	SP	50		D .	29
Turner "B"	SP	. 54		F	29
Turner "B"	SP	55		H	29
Turner "B"	SP	61	•	J	2 9 ·
Turner "B"	SP	64		L	29
Turner "B"	SP	66		N	29
Turner "B"	SP	. 68	· -	P	29
Turner "B"	SP	56	•	J	30
Turner "B"	SP	76		P	30

- (2) That the expanded waterflood project shall be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.
- (3) That monthly progress reports of the expanded waterflood project herein authorized shall be submitted to the Commission in accordance with Rules 704 and 1120 of the Commission Rules and Regulations.

That jurisdiction of this cause is retained entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day And year designated. wa nakiki usuwa kuana kun bili kundin kini kan

LOIL CONSERVATION DIVISI STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

DAVID F. CARGO, Chairman

GUYTON B. HAYS, Member

