VIA FEDERAL EXPRESS

March 3, 1992

Mr. Michael Stogner
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

RE:

Waiver Letter - Unorthodox Well Location

Geronimo Federal Well No. 10 Lea County, New Mexico



Dear Mr. Stogner:

Enclosed for your review and file you will find the original waiver letter from Wallen Production Company as to the unorthodox location of the subject well.

If I can be of any further help in this matter, kindly advise.

Very truly yours,

MITCHELL ENERGY CORPORATION

George Mullen

Regulatory Affairs Specialist

GM/lgb Waivltr.gm February 13, 1992

Wallen Production Company 1310 W. Illinois Street Midland, Texas 79702

RE:

Unorthodox Well Location Geronimo Federal Well No. 10 Lea County, New Mexico

Gentlemen:



This is to advise that Mitchell Energy Corporation is requesting an exception to the Oil Conservation Division's Rule 104C.I for the above subject well. Enclosed is a plat indicating the location of our Geronimo Federal Well No. 10 as follows:

> 660' FNL and 1575' FWL of Section 31, T19S, R33E, Lea County, New Mexico

If you, as an offsetting operator, have no objections to the above request, please indicate by signing in the space provided below and return two copies of this letter to the undersigned in the enclosed self-addressed envelope. The third copy is for your file completion.

Thank you in advance for your prompt attention to this matter and if I can be of any further help, kindly advise.

Very truly yours,

MITCHELL ENERGY CORPORATION

George Mullen

Regulatory Affairs Specialist

GM/lgb Lea.gm Enc.

Date:

VIA FEDERAL EXPRESS

February 26, 1992

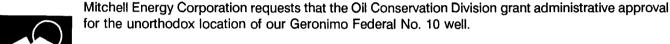
Mr. Michael Stogner Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail Santa Fe, New Mexico

RE:

Rule 104(F)(I) Unorthodox Well Location

Geronimo Federal Well No. 10 Lea County. New Mexico

Dear Mr. Stogner:



The Geronimo Federal No. 10 well is a proposed Yates test staked at an unorthodox location of 660' FNL and 1,575' FWL of Section 31, T19S, R33E. This location is 75' west of our Bone Spring producing Geronimo Federal No. 5 well. Mitchell is very limited on well locations on this lease due to the Potash Area to the south and for the No. 10 well there is also a topographic problem of a BLM Category 2 temporary camp locale to the east. We plan to use our Geronimo Federal No. 5 well pad for the No. 10 well to alleviate further surface damage and utilize the existing facilities.

1du 2/27/92

To aid you in your review of this application, I have enclosed the following information:

Waiver Letters from FI-RO Corporation and Manzano Oil Corporation Plat showing Offset Operators and Wells
Archaeological Survey for Mitchell's Geronimo Federal
Well No. 5
Copy of BLM Application for Permit to Drill our Geronimo
Federal Well No. 10
Certificate of Service to Offset Operator

Should you require further information or if I can be of any further help, kindly advise.

Very truly yours,

MITCHELL ENERGY CORPORATION

George Mullen

Regulatory Affairs Specialist

GM/lgb Gerono.gm Enc.

cc:

Oil Conservation Division - Hobbs Wallen Production Company

February 13, 1992

FI-RO Corporation Box 8148 Roswell, New Mexico 88202

RE:

Unorthodox Well Location Geronimo Federal Well No. 10 Lea County, New Mexico

Gentlemen:



This is to advise that Mitchell Energy Corporation is requesting an exception to the Oil Conservation Division's Rule 104C. I for the above subject well. Enclosed is a plat indicating the location of our Geronimo Federal Well No. 10 as follows:

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Thank you in advance for your prompt attention to this matter and if I can be of any further help, kindly advise.

Very truly yours,

MITCHELL ENERGY CORPORATION

George Mullen

Regulatory Affairs Specialist

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GM/Igb Lea.gm Enc.

Company: FI-RO CORPORATION

Зу:_____

Title: PRESIDENT

Date: 2-15-92

February 13, 1992

Manzano Oil Corporation 1717 W. Second Street Roswell, New Mexico 88202

RE:

Unorthodox Well Location Geronimo Federal Well No. 10 Lea County, New Mexico

Gentlemen:



This is to advise that Mitchell Energy Corporation is requesting an exception to the Oil Conservation Division's Rule 104C.I for the above subject well. Enclosed is a plat indicating the location of our Geronimo Federal Well No. 10 as follows:

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Thank you in advance for your prompt attention to this matter and if I can be of any further help, kindly advise.

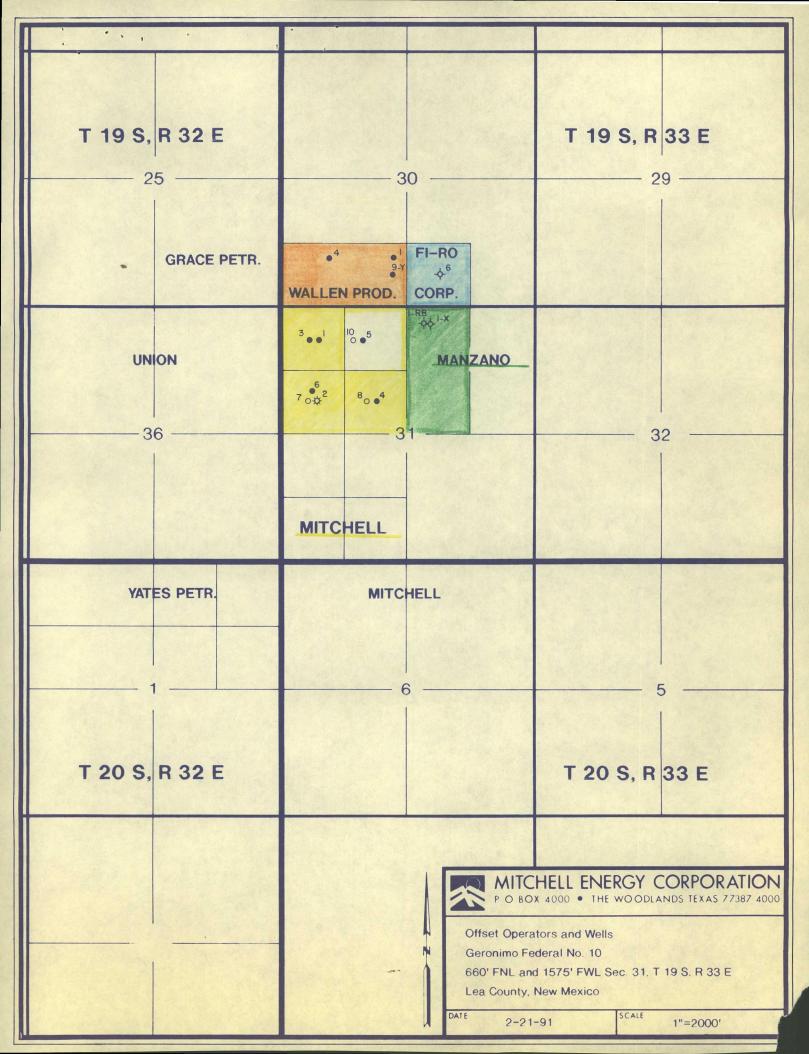
Very truly yours,

George Mullen
Regulatory Affairs Specialist

MITCHELL ENERGY CORPORATION

GM/lgb Lea.gm Enc.

Company: Manzano Oil Corporation By: Title: VP Engineering Date: 2/19/92



Offset Wells Geronimo Federal Well No. 10 Section 31, T19S, R33E Lea County, New Mexico

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#4 Wallen-Tonto (990' FSL & 990' FWL) #1 Wallen-Tonto (990' FSL & 2310' FWL) #9-Y Wallen-Tonto (660' FSL & 2300' FWL) #6 Signal Ross Fed. (660' FSL & 1980' FEL)

Yates/7 Rivers Oil Well Yates/7 Rivers Oil Well Yates/7 Rivers Oil Well D&A

Section 31

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Energy Energy Energy Energy Energy Energy	Energy Energy Energy
Mitchell Mitchell Mitchell Mitchell	Mitchell Mitchell Mitchell Trigg

(660' FNL & 660' FWL) (1980' FNL & 660' FWL)	(660' FNL & 585' FWL) (1980' FNL & 1980' FWL)	(660' FNL &1650' FWL)	(1/2) FNL & 800 FWL) (1980' FNL & 585' FWL)	(1980' FNL & 1905' FWL)	(660' FNL & 1575' FWL)	(330' FNL & 2310' FEL)	(335' FNL & 2223' FEL)
#1 Geronimo Fed	<pre>#3 Geronimo Fed. #4 Geronimo Fed.</pre>	#5 Geronimo Fed.	#7 Geronimo Fed.	#8 Geronimo Fed.	#10 Geronimo Fed.	#1 "RB" Fed.	#1X "RB" Fed.

Delaware Oil Well
Morrow Gas Well
Yates/7 Rivers Oil Well
Bone Spring Oil Well
Bone Spring Oil Well
Delaware Oil Well
Proposed Yates/7 Rivers Location
Proposed Yates/7 Rivers Location
Proposed Yates/7 Rivers Location
J&A
D&A

ARCHAEOLOGICAL SURVEY CONSULTANTS P.O. Drawer D Roswell, New Mexico 88202 Phome: 505-623-5012

JUN 05 1991

Geronimo Fed. Well # 5 & Access Road highly on Access ASC Job 91-83

Date: 5/28/1991

George Tullas Mitchell Energy Corporation 400 West Illinois St., Suite 1000 Midland, Texas 79701

Dear George:

Enclosed please find ASC Report 91-83, covering the archaeological survey of the Geronimo Federal Well No. 5 and access road R/W.

An archaeological site occurred in the initially staked location at 660 FNL, 1980 FWL; movement of the location to 660 FNL, 1650 FWL has avoided the site. Therefore, we have recommended archaeological clearance for the well pad and access road R/W. Copies of the report have been distributed as per the list on the title page, and you need not concern yourself with distribution to those agencies.

Also emclosed please find ASC Imvoice 91-83, for performance of the survey.

We are pleased to have been of service with this project, and hope to assist you in the future. Should you have questions concerning the project, please call our office.

Sincerely,

J.V. Sciscenti Principal Investigator

enclosure: report (1); invoice (1)

cc: ASC File 91-83 (1)

ARCHAEOLOGICAL SURVEY of the MITCHELL ENERGY CORPORATION GERONIMO FEDERAL WELL NO. 5 & ACCESS ROAD R/W T195, R33E, SECTION 31, NEWNWW [660 FNL, 1650 FWL]. LEA COUNTY, NEW MEXICO

FEDERAL LAND SURFACE [USGS 7.5', LAGUNA GATUNA, N.M., 1984]

ASC Report 91-83

by Dorothy M. Griffiths, Project Archaeologist and James V. Sciscenti, Principal Investigator

ARCHAEOLOGICAL SURVEY CONSULTANTS P.O. Drawer D, Roswell, New Mexico 88202 [505] 623-5012

PERMIT NO.: 18-2920-90-E

May 25, 1991

Prepared for:

Mitchell Energy Corporation 400 West Illinois St., Suite 1000 Midland, Texas 79701

Attention: George Tullas

Distribution:

Mitchell Energy Corporation (1)
BLM - Carlsbad Resource Area (2)
New Mexico SHPO (1)
Griffiths (1)

on lands administered by the Department of the Interior Bureau of Land Management Roswell District, New Mexico ASC PERMIT NO.: 18-2920-90-E ASC JOB NO.: 91-83; Mitchell Energy Corp. Geronimo Federal Well No. 5 & Access Road R/W

1. AESTRACT: imtemsive archaeological survey of the Mitchell Energy Corporation Geronimo Federal Well No. 5 (730 ft. EW x 400 ft. NS, 6.7 acres) and access road R/W (590 ft. long X 100 ft. wide, 1.36 acres), with a total feederal lamed sourface of 88.0% acres inspected for cultural remains.

The well pad was originally staked at 660 FNL, 1980 FWL: archaeological survey of the originally staked location revealed the occurrence of a BLM Category 2, temporary camp locale, Type CLC (ASC Site 91-83-S1), consisting of artifact material exposed in 10 or more deflation basins situated on several adjacent dune rises within the eastern part of the proposed well pad (n.b.: some unknown remains of the site were originally noted as "I.M. # 2" during survey of an EW pipeline by P.A.C.; BLM Project 90-553).

The cultural material included a carbon stain, in association with a burnt caliche concentration; the possibility of buried cultural material exists. Since the site appears to be eligible according to National Register criteria, the well combine was moveed 330 ft. west, thus avoiding ASC Site 91-83-51 (see site map attached to the ARMS Site Form).

Archaeological survey of the filmal location of the Geromino Federal Well No. 5 and access road RAW did not reveal any cultural material. Therefore, archaeological DIEARANDE for the Mitchell Energy Corporation Geronimo Federal Well No. 5 and access road R/W is RECOMMENDED.

2. WELL PAD LOCATION: T195, R33E, Section 31, NEWNWW (660 FNL, 1650 FWL). ACCESS ROAD R/W LOCATION: T195, R33E, Section 31: NEWNWW; NWWNWW. Lea County, New Mexico.

Map Reference: U.S.G.S. 7.5 minute series, LAGUNA GATUNA, NEW MEXICO, 1984. Lamd Status: BLM, Roswell District, Carlsbad Resource Area, New Mexico.

3. PROJECT DESCRIPTION: (730 ft. EW x 400 ft. NS, 6.7 acres) and access road R/W (590 ft. long X 100 ft. wide, 1.36 acres), with a total feedberal lammed sourface of 8.05 acres inspected for cultural remains.

TUPPLEMAPTHY: the proposed project is on the Mescalero Pediment, Querecho Plains, ca. 2.4 miles northeast of Laguna Plata, straddling 2 soil zones (see below); the eastern 200 ft. of the well pad (original location) is within localized dune rise terrain associated with Pyote soils — Duneland complex; elongate, relatively deep deflation basins occur in the rises, with undulating terrain separating the rises. The Berino-Cacique fine sands area is marked by slightly inclined, relatively level to slightly undulating terrain with shallow, aeolian topography. Minor dune rises occur in the NE and NW quadrants of the re-located well pad. Shallow deflation basins occur in the Berino-Cacique soil area. Smils: interface of Berino-Cacique loamy fine sands & Pyote soils-Duneland sands. Formament Water: Laguna Plata, ca. 2.39 miles SW. Fortematical Water: Laguna Tonto, ca. 1.57 miles ESE. Elevations: 3571 ft. to 3581 ft. Sloope: 0.5° to 0.7°. Aspect: W/SW. Litthic Resources: not available in the immediate project vicinity. Wegetations: Grassland Formation, scrub-grass scrub disclimax community.

4. EXAMINATION PROCEDURE: straight and zig-zag transects, spaced no further than 15 metres apart, with inspection of all deflation basins; dogleash transects in the vicinity of cultural material. Work Hours com ground: 5.5. Area Delimeaticm: staked by client representative. Visibility: ground, ca. 65%, with 100% in deflation basins; weather, sunny.

5. FINDINGS: BLM records [Ruebelmann, 4/26/1991] indicate the recording of NM-06-4906 in Section 31 (T195, R33E); the site will not be endangered by construction activity.

The well pad was originally staked at 660 FNL, 1780 FWL: archaeological survey of the originally staked location revealed the occurrence of a BLM Category 2, temporary camp locale, Type 2C (ASC 5ite 91-83-S1), consisting of artifact material exposed in 10 or more deflation basins situated on several adjacent dune rises within the eastern part of the proposed well pad (n.b.: remains of the site were originally noted as "I.M. # 2" during survey of an EW pipeline by P.A.C.; BLM Project 90-553).

The cultural material included a carbon stain, in association with a burnt caliche concentration; the possibility of buried cultural material exists. Since the site appears to be eligible according to National Register criteria, the well commune was more THO fit. west, thous awoiding ASC Site 91-83-51 (see site map attached to the ARMS Site Form).

Further data occur in the attached ARMS form, relevant maps and tables.

Archaeological survey of the fimal location of the Geromino Federal Well No. 5 and access road R/W did not reveal any cultural material.

6. RECOMMENDATIONS: since ASC Site 91-83-S1 has been avoided by movement of the proposed well pad, archaeological CLEARANCE for the Mitchell Energy Corporation Geronimo Federal Well No. 5 and access road R/W is RECOMMENDED without any proviso.

Date of Examination: May 2 & B, 1991

Project Archaeologist:

D.M. Griffiths

Principal Investigator:

