## DEVON ENERGY OPERATING CORPORATION

ra :- 1991 3

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102

June 8, 1995

405/235-3611 Fax 405/552-4550 Fax 405/552-4552



State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location for the infill producing well located within the Keel West Waterflood Project, at the following location:

WELL

#### LOCATION

J. L. Keel "B" #73

1308' FSL & 2556' FWL, Sec. 5-17S-31E

Attached is a plat of the Keel - West Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Keel - West Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to the governmental quarter - quarter section boundaries. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation ( approximately 4000' ). The well will be drilled at the unorthodox locations in order to prevent waste by developing an efficient production and injection pattern within the Keel - West Waterflood Project, which was approved under Order R - 2268. When fully developed this well will combine with the existing wells ( some of which will eventually be converted to injection ) to establish a 40 acre 5 spot waterflood pattern.

There are no operators that have production in offsetting 40 acre tracts. The well listed is offset by wells that are already operated by Devon Energy Operating Corporation;

therefore, no notification is necessary.

. . . \*

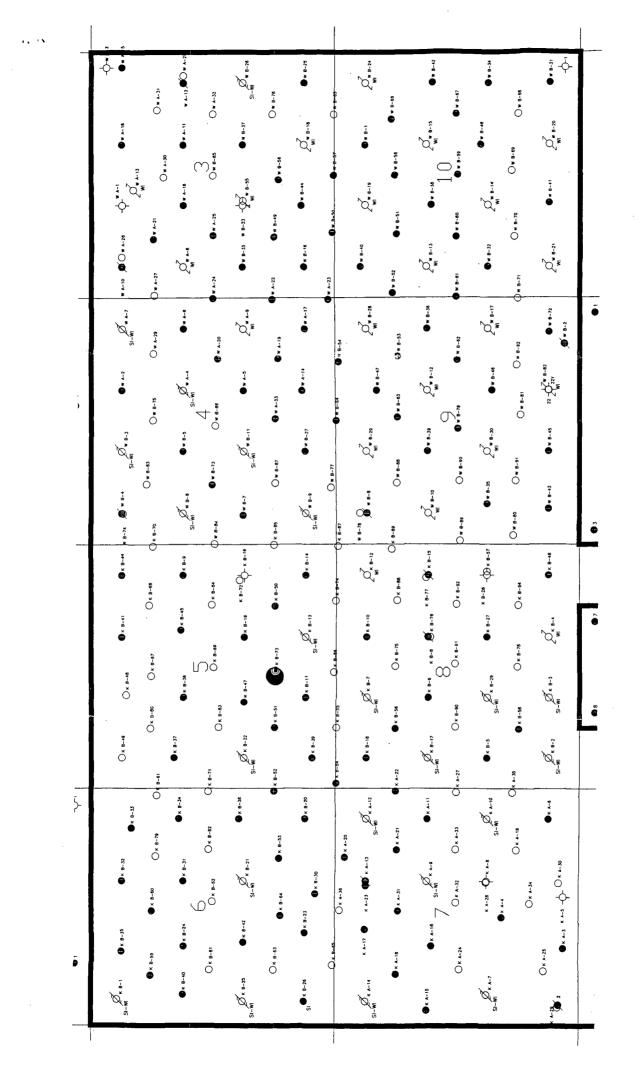
۰.

Should you require any additional information regarding any of these unorthodox locations please notify me at 405-552-4527.

Sincerely,

Karen Rosa Byers Karen Rosa Byers

Engineering Technician



form 3160-3 December-1990)	UNITE Department	D STATES OF THE INTERI	SUBMIT IN TRIPLICA OR (See other instructions on reverse side)	TE•	Form approved.		
¥j	BUREAU OF L	AND MANAGEMENT		5. LEASE 1 LC 0294	ESIGNATION AND SE 35-B	RIAL NO.	
la TYPE OF WORK:		AIT TO DRILL OR DEEPEN		6. LF INDI NA	AN, ALLOTTEE OR T	RIBE NAME	
h TYPE OF WELL:			MULTIPLE	7.UNIT AG	REEMENT NAME	·····	
2 NAME OF OPERA	WELL OUICI		LEASE NAME, WELL EL "B" #73	NO.			
3. ADDRESS AND T	ELEPHONE NO.	TE 1500, OKC, OK 73102	(405) 552-4560	9.API WEI	L NO.		
	ELL (Report location clearly and in "FSL & 2556' FWL		<u> </u>	GRAYB	AND POOL, OR WILD URG-JACKSON	CAT AND SURVEY OR AREA	
At top proposed proc	l. zone (SAME)			SECTIO	N 5 -T17 S - R31	E	
	AND DIRECTION FROM NEAREST TOWN les north of Loco Hills, N.M.	OR POST OFFICE*		12. COUNT EDDY	TY OR PARISH	13. STATE NM	
15.DISTANCE FROM PROP	POSED	16.NO. OF ACRES IN LEASE			17.NO. OF ACRES	ASSIGNED	
LOCATION TO NEARES PROPERTY OR LEASE	LINE, FT. 3972	606.92			TO THIS WELL		
(Also to rearest drg. unit line if any)   19. DISTANCE FROM PROPOSED LOCATION*     19. DISTANCE FROM PROPOSED LOCATION*   19. PROPOSED DEPTH     TO NEAREST WELL, DRILLING, COMPLETED,   4000     OR APPLIED FOR, ON THIS LEASE, FT.   900'					20. ROTARY OR CABLE TOOLS* Rotary		
21. ELEVATIONS (Show we 3841' GR	ether DF, RT, GR, etc.)				PPROX. DATE WORK 30, 1995	WILL START*	
23.		PROPOSED CASING AND C	EMENTING PROGRAM				
SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH		QUANTIT	OF CEMENT	
12 1/4"	8 5/8" J-55	24.0#	400'	2	00 sk RFC cmat + 2	00 sk Class "C"	
7 7/8"	5 1/2" J-55	15.5#	4000'	5	00 sk Class "C" 3	5/65 + 500 sk Class	
<u>.                                    </u>				*	C" + 1/4 lb/sk ce	llophane flakes	

We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4000' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are outlined in the following exhibits and attachments.

**Drilling Program** 

<b>Drilling Program</b>	<u>n</u>	The undersigned accepts all applicable
Exhibits #1/1-A	= Blowout Prevention Equipment	terms, condition, stipulations and
Exhibit #2	= Location and Elevation Plat	restrictions concerning operations
Exhibit #3/3-A	= Road Map and Topo Map	conducted on the leased land or portions
Exhibit #4	= Wells Within 1 Mile Radius	thereof, as described below:
Exhibit #5	= Production Facilities Plat	Lease No. LC029435-B
Exhibit #6	= Rotary Rig Layout	Legal Description: Section 5-T17N-R31E
Exhibit #7	= Casing Design	Bond Coverage: Nationwide
H2S Operating	Plan	BLM Bond No.: CO1151

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any. 24.

signed damy Jackson	RANDY JACKSON TITLE <u>DISTRICT ENGINEER</u>	DATE 5/2/985
*(This space for Federal or State office use)		
PERMIT NO	APPROVAL DA	TE
Application approval does not warrant or cartify that the applicant holds	legal or equitable title to those rights in the subject lease	which would entitle the applicant to conduct operations thereon.
CONDITIONS OF APPROVAL, IF ANY:		vince would characteric approach to conduct oper autorit diereon.

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction

<u>/RICT I</u> 0. Box 1980 1. bbs: NM 88241-1980

JISTRICT II P. O. Drawer DD Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

DISTRICT IV P. O. Box 2088

Santa Fe, NM 87507-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number			<sup>2</sup> Pool Code	· · · ·	3 Poo	l Name					
						Grayburg J	ackson			·	
* Property Co	de	<sup>5</sup> Property N		ĸ	EEL 'I	3″			•	Vell Number 73	
OGRID No.		* Operator N	J.]				<u> </u>			Elevation	
				ON EN	ERGY	OPERATIN	g Compai	NY		3841	•
				" SUI	RFACE	LOCATION					
UL or lot no.	Section	Township	Rang					line Feet from		-	County
N	5	17 SOUTH	31 EAST,	N.M.P.M.	L	1308,	SOUTH	2556	<u></u>	WEST	EDDY
		"BOTTO	M HOLE	LOCAT	ION IF	DIFFERE	NT FROM	SURFACE			
UL or lot no.	Section	Township	Rang	e	Lot Ida	Feet from the	North/South	line Feet from	the Eas	st/West line	County
12 Dedicated A	cres 13 Jo	int or Infill	14 Consolidatio	on Code	15 Order	No.	I		<u>L</u>		
40											
	NO AL	LOWABLE WE	LL BE ASS	IGNED T	O THIS	COMPLETION	UNTIL AL	L INTERESTS	HAVE	BEEN	
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16									TOP (	CERTIFIC	ATTON
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								JOB #38	417020	798 SW	/ V.H.B.

State of New Mexico Energy, Minerals, and Natural Resources Department

OIL CONSERVATION DIVISION

P. 0. Box 2088 Santa Fe, New Mexico 87504-2088 Instructions on back

Submit to the Appropriate District Office State Lease — 4 copies Fee Lease — 3 copies

AMENDED REPORT

DEVON ENERGY **OPERATING CORPORATION** 

Oklahoma City, Oklahoma 73102

UL CONSERVENON DIVISION RECI 20 North Broadway, Suite 1500 <sup>95</sup> JUN 2Eax 405/255-3611 Fax 405/552-4552

June 20, 1995

State of New Mexico Energy, Minerals and Natural Resources Department **Oil Conservation Division** 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

#### Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox locations for the infill producing wells located within the Keel West Waterflood Project, at the following locations:

WELL	LOCATION			
J. L. Keel B #72	2230' FSL & 760' FEL, Sec. 5-17S-31E			
J. L. Keel B #75	1274' FNL & 2456' FEL, Sec. 8-17S-31E			

Attached is a plat of the Keel - West Waterflood Project showing the project boundaries that are adjacent to the subject wells. Forms 3160 - 3 and C - 102 are attached for each of the two wells listed above. The Keel - West Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above locations do not conform to Rule 104. C. I. because they are located closer than 330' to the governmental quarter - quarter section boundaries. They will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The wells will be drilled at the unorthodox locations in order to prevent waste by developing an efficient production and injection pattern within the Keel - West Waterflood Project, which was approved under Order R - 2268. When fully developed these wells will combine with the existing wells ( some of which will eventually be converted to injection ) to establish a 40 acre 5 spot waterflood pattern.

There are no operators that have production in offsetting 40 acre tracts. The two wells listed are offset by wells that are already operated by Devon Energy Operating Corporation; therefore, no notification is necessary.

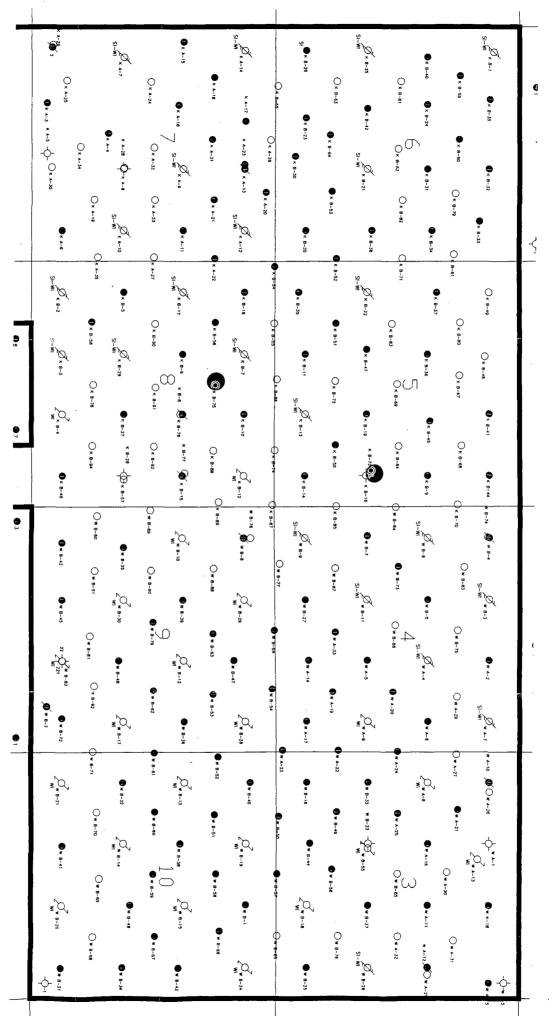
Should you require any additional information regarding any of these unorthodox locations please notify me at 405-552-4527.

΄,

Sincerely,

Karen Byers

Engineering Technician



form 3160-3 December 1990)	• • • • • • •	D STATES OF THE INTERIC	SUBMIT IN TRIPLICAT (See other instructions on reverse side)	ſE*	Form approved	
!	BUREAU OF L	AND MANAGEMENT	······································		DESIGNATION AND S 9435-B	ERIAL NO.
	APPLICATION FOR PERI	WIT TO DRILL OR DEEPEN		i i	DIAN, ALLOTTEE OR	TRIBE NAME
la TYPE OF WORK:		DEEPEN		NA	AGREEMENT NAME	
b. TYPE OF WELL:	OAS WELL Other	BINGLE ZONE	XULTIPLE	NA		
2 NAME OF OPERA	TOR	RATING CORPORATION		1	OR LEASE NAME, WEL eel "B" #72	L NO.
3. ADDRESS AND T		TE 1500, OKC, OK 73102 (	(405) 552-4560	9.API W		
At surface 2230	ELL (Report location clearly and in 'FSL & 760' FEL	accordance with any State require.	menis) *	GRAY	D AND POOL, OR WILL BURG-JACKSON ,T.,R.,M., OR BLOCK ION 5-T17 S - R31	AND SURVEY OR AREA
At top proposed proc					INTY OR PARISH	13. STATE
	AND DIRECTION FROM NEAREST TOWN iles north of Loco Hills, N.M.	OR POST OFFICE*		EDDY	INTI OR PARISH	NM
15.DISTANCE FROM PROD LOCATION TO NEARES PROPERTY OR LEASE	ST LINE, FT. 750'	16.NO. OF ACRES IN LEASE 606.92			17.NO. OF ACRE TO THIS WEL 40	
(Also to rearest drig unit line if any).				20. ROTARY OR CABLE TOOLS* Rotary		
21 ELEVATIONS (Show we 3890' GR	hether DF, RT, GR, etc.)			1	APPROX. DATE WORK INC 15, 1995	WILL START*
23.		PROPOSED CASING AND C	EMENTING PROGRAM	L.	<u> </u>	
SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH			Y OF CEMENT
12 1/4"	8 5/8" J-55	24.0#	400'		200 sk RFC cmt + 2	200 sk Class "C"

51/2" J-55 15.5# 4000 500 sk Class "C" 35/65 + 500 sk Class 7 7/8" + 1/4 lb/sk cellophane flakes We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4000' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are

outlined in the following exhibits and attachments.

Dri	lling	Pro	gram
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<b>Drilling Progra</b>	<u>m</u>	The undersigned accepts all applicable
Exhibits #1/1-A	= Blowout Prevention Equipment	terms, condition, stipulations and
Exhibit #2	= Location and Elevation Plat	restrictions concerning operations
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Exhibit #4	= Wells Within 1 Mile Radius	thereof, as described below:
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Exhibit #6	= Rotary Rig Layout	Legal Description: Section 5-T17N-R31E
Exhibit #7	= Casing Design	Bond Coverage: Nationwide
<b>H2S</b> Operating	Plan	BLM Bond No.: CO1151
<b>H2S</b> Operating	Plan	BLM Bond No.: CO1151

N ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal s to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any. :4.

SIGNED Rawy Jackson	TITLE	RANDY JACKSON <u>DISTRICT ENGINEER</u>	DATE _	5/24/95
This space for Federal or State office use)				
ERMIT NO		APPROVAL DAT	'E	
pplication spproval does not warrant or certify that the applicant holds legal 'ONDITIONS OF APPROVAL, IF ANY:	l or equitable titl			
PPROVED BY	TITLE			DATE
`		ons On Reverse Side		

itle 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent atements or representations as to any matter within its jurisdiction

<u>CT I</u> Box 1980 s. NM 88241-1980

<u>TRICT II</u> O. Drawer DD Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

<u>DISTRICT IV</u> P. O. Box 2088 Santa Fe, NM 87507-2088 State of New Mexico Energy, Minerals, and Natural Resources Department Form C-102 Revised 02-10-94

Instructions on back

Submit to the Appropriate District Office State Lease — 4 copies Fee Lease — 3 copies

### OIL CONSERVATION DIVISION P. 0. Box 2088 Santa Fe, New Mexico 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

1 API Number	² Pool (	Code	<sup>3</sup> Pool Na	me		· · · · · · · · · · · · · · · ·			
			Gr	ayburg	Jackson				
Property Code Property Name J. L. KEEL				L 'B'				• Vell Number 72	
'OGRID No.	• Operator Name	DEVON		rating.	RATION		* Elevation 3890	)'	
· · · · · · · · · · · · · · · · · · ·		" SURF	ACE LO	CATION			I,,,		
UL or lot nc. Section I 5	Township 17 SOUTH 31 EA	Renge L ST, N.M.P.M.		from the 2230'	North/South SOUTH	line Feet from 760'	the East/West line EAST	County EDDY	
	"BOTTOM HO								
UL or lot no. Section	Township					line Feet from	the East/West line	County	
12 Dedicated Acres 13 Join	at or Infill <sup>14</sup> Conso	lidation Code <sup>15</sup>	Order No.		i <u> </u>				
40									
	OWABLE WELL BE SOLIDATED OR A								
						/ hereby contained to the bess Signature //Convex Printed Na Randy . Title Districe May 23 SURVE / hereby location plotted for surveys my sup some is best of	Jackson <u>ct Engineer</u> , 1995 <b>YOR CERTIFIC</b> y certify that the shown on this prom field notes of made by me of ervision, and the true and correct my belief.	ATION he well fact was f actual f under hat the	
·				22	30'	Date of Su Signature Professional *	MAY 12, 1995 pd di	<b>₹7920</b> V.H.B.	

form 3160-3 December 1990)	DEPARTMENT	STATES	SUBMIT IN TRIPLICATE R (See other instructions on reverse side)	•	Form approved.	
ł	BUREAU OF LAND MANAGEMENT					IAL NO.
	APPLICATION FOR PERM	IT TO DRILL OR DEEPEN		LC 0294	IAN, ALLOTTEE OR TR	IBE NAME
la TYPE OF WORK:	DRILL 🔀			NA		
h TYPE OF WELL:			1		REEMENT NAME	
	WELL Other	ZONE	MULTIPLE ZONE	NA		
2 NAME OF OPERA					LEASE NAME, WELL 1 "B" #75	NO.
3. ADDRESS AND T	DEVON ENERGY OPER	ATING CORPORATION		9.API WEI	L NO.	
3. ADDRESS AND T		E 1500, OKC, OK 73102 (4	105) 552-4560			
	ELL (Report location clearly and in c 'FNL & 2456' FEL				AND POOL, OR WILDCH URG-JACKSON	1
At top proposed prod	. zone (SAME)				г., r., м., ок block an N 8-T17 S - R31 E	D SURVEY OR AREA
	AND DIRECTION FROM NEAREST TOWN	R POST OFFICE*			TY OR PARISH	13. STATE
4 miles east & 4 mi	les north of Loco Hills, N.M.			EDDY		MM
5.DISTANCE FROM PROP		16.NO. OF ACRES IN LEASE			17.NO. OF ACRES	ASSIGNED
LOCATION TO NEARES	LINE, FT. 2456'	606.92		TO THIS WELL 40		
(Also to nearest drig, unit li B.DISTANCE FROM PROP	neilany) OSED LOCATION* RILLING, COMPLETED,	19. PROPOSED DEPTH		20. ROTARY OR CABLE TOOLS*		
OR APPLIED FOR, ON		4000			Rotary	
1. ELEVATIONS (Show wh	ether DF, RT, GR, etc.)				PPROX. DATE WORK WI e 15, 1995	ILL START*
3.	GRADE, SIZE OF CASING	PROPOSED CASING AND CE	MENTING PROGRAM		QUANTITY	05 (5)(5)
2 1/4"	8 5/8" J-55	24.0#	400'	2	00 sk RFC cmt + 200	
7/8"	5 1/2" J-55	15.5#	400		00 sk Class "C" 35/	
					C" + 1/4 lb/sk cell	ophane flakes

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Exhibit #5	= Production Facilities Plat	Lease No. LC029435-B	
Exhibit #6	= Rotary Rig Layout	Lega' Description: Section 8-T17N-R31E	
Exhibit #7	= Casing Design	Bond Coverage: Nationwide	
<b>H2S Operating</b>	Plan	BLM Bond No.: CO1151	
~		•	

ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

SIGNED (and Jacks	RANDY JACKSON 	DATE 5/24/95				
This space for Federal or State office use)						
RMIT NO	APPROVAL DATE					
plication approval does not warrant or certify that the applicant hold ONDITIONS OF APPROVAL, IF ANY:						
PROVED BY	TITLE	DATE				
	See Instructions On Reverse Side					
la 1911 C. Canting 1001 malers in suite C.						

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<i>r</i>	

O. Drower DD Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

<u>DISTRICT IV</u> P. O. Box 2088 Santa Fe, NM 87507-2088

State of New Mexico Energy, Minerals, and Natural Resources Department

Form C-102 Revised 02-10-94

Instructions on back

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

AMENDED REPORT

# OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT I API Number 2 Pool Code 3 Pool Name

API Number					Graybur	g Jackson	1				
Property Code 015968	<sup>5</sup> Property Name J. L. KEEL								* Well Number 75	• Well Number 75	
'OGRID No.	• Operator Name Operating						* Rievation				
DEVON ENERGY^CORPORATION								3777	3777'		
* SURFACE LOCATION											
UL or lot no. Section	Township	Pang		Lot Ide	Foel from the	4	line			County	
B 8		31 EAST,			1274'-	NORTH		2456'	EAST	EDDY	
			~		DIFFERE						
UL or lot no. Section	Township	Rang	le	Lot Ida	Feet from the	North/South	line	Feet from the	Bast/West line	County	
12 Dedicated Acres 13 Joi 40	nt or lnfill	<sup>14</sup> Consolidati	on Code	15 Order	No.				<u> </u>		
NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION											
10			1					OPERATO	R CERTIFIC	ATION	
								I hereby certi	ify that the infi	ormotion	
					1			contained here to the best of	ein is true and my knowledge a	complete nd belief.	
			1274'					Signature	<u> </u>		
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			1		- 2456:			Randy Jac	kson		
	-+		+-×   					<b>nue</b> District	Engineer		
:								Date May 23, 1	995		
			 					l hereby co location sho plotted from surveys mad my supervi		e well at was actual under at the	
								* * * * * * * * * * * * * * * * *	LYNN * ZNER 7920 M MND YES.	<b>#7920</b> V.H.B.	