

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor

March 24, 2004

Joanna Prukop Cabinet Secretary Acting Director Oil Conservation Division

Pogo Producing Company c/o James Bruce P. O. Box 1056 Santa Fe, New Mexico 87504

Administrative Order NSL-3883-A (SD)

Dear Mr. Bruce:

Reference is made to the following: (i) your application (*administrative application reference No. pMES0-407754110*) dated February 19, 2004 on behalf of the operator Pogo Producing Company ("Pogo"); and (ii) the records of the New Mexico Oil Conservation Division ("Division") in Santa Fe, including the file on Division Administrative Order NSL-3883: all concerning Pogo's request for an unorthodox "infill" oil well location within an existing standard 40-acre oil spacing and proration unit comprising the SE/4 NW/4 (Unit F) of Section 3, Township 22 South, Range 31 East, NMPM, West Lost Tank-Delaware Pool (96582), Eddy County, New Mexico.

This application has been duly filed under the provisions of Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999.

This 40-acre unit is currently dedicated to Pogo's Lost Tank "3" Federal Well No. 3 (API No. 30-015-29859) located at an unorthodox oil well location (approved by Division Administrative Order NSL-3883, dated October 9, 1997) 1450 feet from the North line and 1650 feet from the West line of Section 3.

It is the Division's understanding that all of Section 3 and Lots 1, 2, and 3, the S/2 N/2, and the S/2 of Section 4, Township 22 South, Range 31 East, NMPM, Eddy County, New Mexico is a single Federal lease (U. S. Government lease No. NM-0417696) with common mineral interests in which Pogo is the operator; therefore, there are no effected offsets to the subject 40-acre tract other than Pogo.

The geologic interpretation submitted with this application indicates that a well drilled at the proposed unorthodox oil well location will be at a more favorable geologic position within the SE/4 NW/4 of Section 3. Further, the Delaware infill-drilling program proposed by Pogo within this lease will serve to drain additional reserves within the productive interval that might not otherwise be produced, and to provide for a more efficient production pattern within the West Lost Tank-Delaware Pool. Also, should secondary recovery be implemented within the West Lost Tank-Delaware Pool on this lease, the proposed location will allow the implementation of a more efficient and effective production/injection pattern.

Oil Conservation Division * 1220 South St. Francis Drive * Santa Fe, New Mexico 87505 Phone: (505) 476-3440 * Fax (505) 476-3462 * http://www.emnrd.state.nm.us Pogo Producing Company March 24, 2004 Page 2

By the authority granted me under the provisions of Division Rule 104.F (2), the following described well to be drilled at an unorthodox "infill" oil well location within the SE/4 NW/4 (Unit E) of Section 3 is hereby approved:

Lost Tank "3" Federal Well No. 22 2500' FNL & 1850' FWL.

Further, both the existing Lost Tank "3" Federal Well No. 3 and the proposed Lost Tank "3" Federal Well No. 22 are to be simultaneously dedicated to the subject 40-acre unit.

Sincerely, Martin

Michael E. Stogner Engineer/Hearing Officer

MES/ms

cc: New Mexico Oil Conservation Division – Artesia U. S. Bureau of Land Management – Carlsbad File: ____NSL-3883