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		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 Deven SFS
		ADMINISTRATIVE APPLICATION CHECKLIST
	ication Acronyr [NSL-Non-St [DHC-Dov [PC-P	MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE anderd Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] whole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] 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] allified Enhanced Oli Recovery Certification] [PPR-Positive Production Response]
[1]	[A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD OCT 6 2001 k One Only for [B] or [C] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
	[D]	WFX PMX SWD IPI EOR PPR Other: Specify
[2]	NOTIFICAT [A]	TION REQUIRED TO: - Check Those Which Apply, or Does Not Apply 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 AC	CURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE

[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.

OF APPLICATION INDICATED ABOVE.

application until the required in Note: Stateme		ons are submi	tted to the Divisi		
James Bruce	(laues D	Wer	Attorney	for Applicant	= 10/1 <i>5</i> /10(
¹ rint or Type Name	Signature	(Title		Date
JAMES BRUCE			jamesbru		
P. O. BOX 1056 Santa Fe. NM 87504			e-mail Address	5	
	l				

JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 13, 2001

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Devon SFS Operating, Inc. ("Devon") applies for administrative approval of an unorthodox gas well location for the following well:

<u>Well</u>: <u>Location</u>: 1980 feet FSL & 660 feet FWL <u>Unit</u>: <u>W½</u> of Section 15, Township 15 South, Range 28 East, N.M.P.M., Chaves County, New Mexico

The well will be drilled to test the Morrow formation (Undesignated Buffalo Valley-Pennsylvanian Gas Pool). Under the special rules for said pool, spacing is 320 acres. However, wells must be located in the northwest quarter or southeast quarter of a section, and be no closer than 990 feet to the outer boundary of the quarter section. Thus, the location is unorthodox because it is in the "wrong" quarter section, and it is too close to the quarter section line. A Form C-102 for the well is being prepared, and will be submitted shortly.

The application is based on geologic reasons. Attached as Exhibit A is a net sand isopach of the Atoka and Morrow formations, the primary producing zones in the area. The thickest sands are in the southwest quarter of the section. Although there is a potential location in the southeast quarter with equivalent sand thickness, the sand begins thinning as you move to the east, and lack of well control to the east indicates that it is a better to remain in the southwest quarter.

A land plat of the area is attached as Exhibit B. The offset operators/lessees are as follows:

1. <u>Section 9</u>: Yates Petroleum Corporation

- 2. <u>Section 10</u>: Santa Fe Snyder Corporation (now Devon) Yates Petroleum Corporation
- 3. <u>Section 11</u>: Chi Energy, Inc. Yates Petroleum Corporation
- 4. <u>Section 14</u>: Concho Resources, Inc. (now Devon)
- 5. <u>Section 23</u>: Santa Fe Snyder Corporation (now Devon) Yates Petroleum Corporation
- 6. <u>Section 22</u>: Santa Fe Snyder Corporation (now Devon)
- 7. <u>Section 21</u>: Branex Resources, Inc. Harvey E. Yates Company
- 8. <u>Section 16</u>: Yates Petroleum Corporation

A copy of the notice letter sent to the offsets is attached hereto as Exhibit C.

Please call me if you need any further information on this matter.

Very truly yours,

James

Attorney for Devon SFS Operating, Inc.

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JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 13, 2001

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Branex Resources, Inc. 403 North Pennsylvania Roswell, New Mexico 88201

Harvey E. Yates Company P.O. Box 1933 Roswell, New Mexico 88202

Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210

Chi Energy, Inc. P.O. Box 1799 Midland, Texas 79702

Ladies and Gentlemen:

Enclosed is a copy of an application, filed with the Oil Conservation Division by Devon SFS Operating, Inc., requesting administrative approval of an unorthodox oil well location in the Pennsylvanian formation in the W% of Section 15, Township 15 South, Range 28 East, NMPM, Chaves County, New Mexico. If you object to the well's location, you must notify the Division in writing no later than Friday, November 2, 2001 (1220 South St. Francis Drive, Santa Fe, New Mexico 87505; attention: Michael E. Stogner). Failure to object will preclude you from contesting this matter at a later date.

Ver truly yours,

Attorney Devon SFS Operating, Inc.



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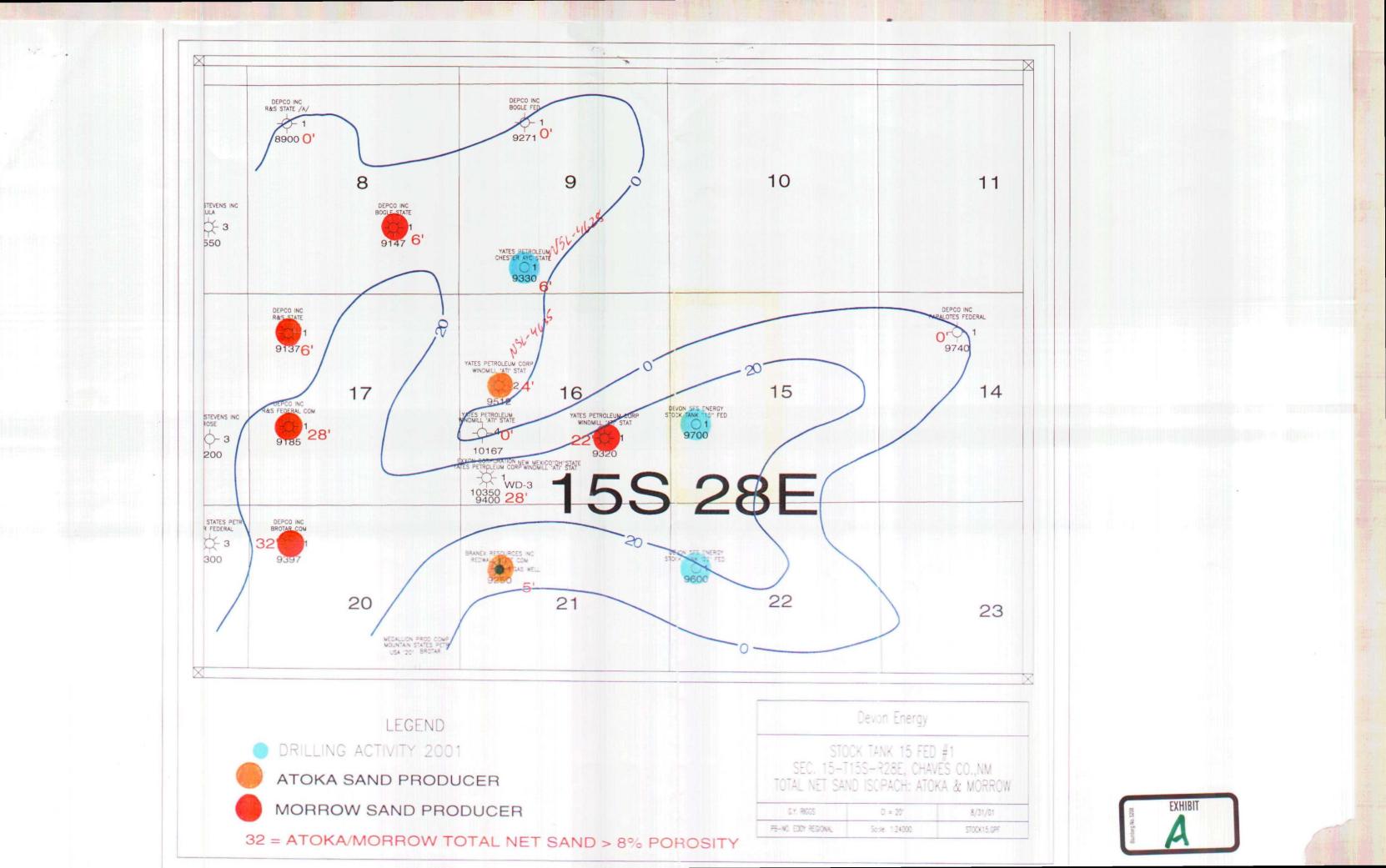
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JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 19, 2001

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re:	<u>Well</u> :	Stock Tank "15" Fed. Well No. 1
	Location:	1980 feet FSL & 660 feet FWL
	Unit:	W½ of Section 15, Township 15 South, Range 28
		East, N.M.P.M., Chaves County, New Mexico

Dear Mr. Stogner:

Regarding the administrative application for an unorthodox location filed on the above well, enclosed is a copy of the Form C-102.

Very truly yours,

James Bruce

Attorney for Devon SFS Operating, Inc.

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

October 22, 2001

Lori Wrotenbery Director Oil Conservation Division

Devon SFS Operating, Inc. c/o James Bruce P. O. Box 1056 Santa Fe, New Mexico 87504

Re: Administrative application for an exception to the well location provisions [Rule 2 (b)] of the "Special Rules and Regulations for the Buffalo Valley-Pennsylvanian Gas Pool," as promulgated by Division Order No. R-8170, as amended.

Dear Mr. Bruce:

This letter acknowledges the receipt of your administrative application dated October 13, 2001 on behalf on Devon SFS Operating, Inc. for an unorthodox Morrow gas well location for the proposed Stock Tank "15" Federal Well No. 1 (API No. 30-005-63371), to be drilled 1980 feet from the South line and 660 feet from the West line (Unit L) of Section 15, Township 15 South, Range 28 East, NMPM, Chaves County, New Mexico. The Division received your application on October 16, 2001, and assigned it NMOCD application reference No. *pKRV0-129039620*. Please refer to this number in future correspondence with the Division.

Our preliminary review indicates that the information provided in the application is not sufficient to process an administrative order. While your geological data supports locating this well in the SW/4 rather then the NW/4 of Section 15 it is insufficient to support the 660 offset requests.

Since the submitted information is insufficient to review, the application was ruled as incomplete on October 22, 2001. Please submit the above stated information by Monday, October 29, 2001.

The Division cannot proceed with your application until the required information is submitted. Upon receipt, the Division will continue to process your application. The additional information can be faxed to (505) 476-3471, or mailed to the Division in Santa Fe. If the necessary information is not submitted, your application will be returned to you.

Should you have any questions concerning this matter, please contact me in Santa Fe at (505) 476-3465. Thank you.

Sincerely

Michael E. Stogner Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division – Artesia

÷,

JAMES BRUCE

Attorney at Law Post Office Box 1056 Santa Fe, New Mexico 87504 Telephone: (505) 982-2043 Fax: (505) 982-2151

FAX COVER SHEET

DELIVER TO: Michael E. Stogner

COMPANY: Oil Conservation Division

CITY: Santa Fe, New Mexico

FAX NUMBER: (505) 476-3471

NUMBER OF PAGES: 2 (Including Cover Sheet)

DATE SENT: 10/29/01

MEMC:

CONFIDENTIALITY NOTICE

This transmission contains information which may be confidential and/or legally privileged. The information is intended only for the above-named recipient. If you are not the intended recipient, copying or distribution of the information is prohibited. If you have received this transmission in error, please call us at the above number and return the document by United States mail. Thank you.

5059800151 P.01

JAME SERVICE.

PAGE 02

JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 29, 2001

<u>Via Fax</u>

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

> Re: <u>Well</u>: Stock Tank "15" Fed. Well No. 1 <u>Location</u>: 1980 feet FSL & 660 feet FWL <u>Unit</u>: W% of Section 15, Township 15 South, Range 28 East, N.M.P.M., Chaves County, New Mexico

Division Reference No. pKRV0-129039620

Dear Mr. Stogner:

Your letter of October 22, 2001, on the above administrative application, requests information to support a location <u>660</u> feet FWL. While Devon SFS Operating, Inc. ("Devon") believes that, based on well control, the well must be located in the SW4 of Section 15, it cannot provide you with information mandating a 660 foot location as opposed to a 990 foot location. Therefore, Devon requests that the application be <u>amended</u> to request a location <u>990</u> feet FWL and 1980 feet FSL. While the well would still be in the "wrong" quarter section, it would otherwise comply with the footage requirements of the pool rules for the Buffalo Valley-Pennsylvanian Gas Pool.

Please let me know if this is acceptable. Thank you for your attention to this matter.

Very truly yours,

Bruce E Gr

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Torney for Devon SFS Operating, Inc.

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New Mexico Oil Conservation Division---Enginnering Bureau Administrative Application Process Documentation

Date Application Received	10-16-2001		
Date of Preliminary Revie	10-22-2001		
(Note: Must be within 10	-days of received date)		
Results:A	م pplication Complete	Application Incomplete	
Date Incomplete Letter Se	ent:	10-22-2001	
Deadline to Submit Reque	10-29-2001		
Phone Call Date:		NR	
(Note: Only applies is req	uested data is not submitted	within the 7-day deadline)	
Phone Log Completed?	Yes	No	
Date Application Processe	11-5-01		

Date Application Returned:

(Note: Only as a last resort & only after repeated attempts by the Division to obtain the necessary information to process the application)

Aformation en mithed 10-29-2001

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