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Midland Division
Exploration Production

REC: VED

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Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

October 7, 1994

Michael E. Stogner Oil Conservation Division P.O. Box 2088 Santa Fe, NM 87504 Case 11158

RE: Application to:

- (1) Establish A 38.68-Acre NSPU for Eument Gas
 Production For the Proposed State A-19 Well
 No. 2 in the NW/4 SW/4 Sec. 19, T-19S, R-37E
- (2) Approve an unorthodox Location for the Subject Well due to Lease Size and Surface Obstructions

Dear Mr. Stogner:

As shown on the attached EXHIBIT A, Conoco's State A-19 Lease is an isolated ± 40-acre tract that is surrounded by producing Eumont Gas wells, but does not contain an active Eumont Gas well. The former State A-19 No. 1 on this lease was a dual Grayburg and Eumont producer from 1953 until 1982, recovering 1 BCFG. At that time the Eumont completion was squeezed off to increase the prolific Grayburg completion at this location and this wellbore was subsequently taken into Amerada's North Monument Grayburg San Andres Unit.

To the South, Texaco's New Mexico G State Well Nos. 2 and 3 have recovered 3.2 BCFG and the No. 3 is still producing 362 MCFGPD. To the West, Texaco's newly drilled New Mexico G State Well No. 4, completed in 11/92 is currently producing 376 MCFGPD. The Arrington State C No. 2 to the Northwest was drilled 10/92 and still flows 297 MCFGPD. The addition of the two new Eumont Gas wells to the West of Conoco's State A-19 Lease make it imperative that Conoco drill a new gas well on its lease to capture it's share of remaining Eumont Gas reserves and to protect this lease from drainage.

EXHIBIT B is a C-102 showing this lease as consisting solely of Lot 3 in Section 3, T-19S, R-37E which contains 38.68 acres. Since this is the only contiguous acreage available to dedicate to a new well, it is requested that a 38.68-acre nonstandard gas proration unit be established for the proposed State A-19 No. 2.

EXHIBIT B also shows that the original No. 1 well was drilled at the only possible standard location for this tract. therefore, a second well is necessarily an unorthodox location because of the size of the lease and the obstruction of the first well.

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EXHIBIT C is a plat showing the former State A-19 No. 1 Well (Amerada's Well No. 12), the proposed location for the State A-19 No. 2, and all of the roads, pads, pipelines, and other surface obstructions which had to be avoided in staking the new location. The closest location to the center of the tract that would accommodate the required drilling operations was at 1760' FSL and 624' FWL (EXHIBIT B).

Therefore, in order to protect this lease from future drainage and loss of correlative rights to its fair share of the remaining Eumont gas reserves under this lease, both a nonstandard gas proration unit and an unorthodox drilling location are necessary. Conoco requests that both of these exceptions to the well spacing regulations be granted.

Copies of this application have been sent by certified mail to all offset operators as shown on EXHIBIT A and listed in EXHIBIT D. Copies of the certified mail receipts are also attached as EXHIBIT E.

If there are any further question concerning this application please contact me at (915) 686-6548.

Very truly yours,

Jerry W. Hoover

Sr. Conservation Coordinator

State AC #1

R36E

R37E

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EXHIBIT A

CONOCO INC.
PRODUCTION DEPARTMENT
EUMONT FIELD
CONOCO STATE A-19 LEASE
LEA COUNTY, NEW MEXICO

T19S

State of New Mexico Forers, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

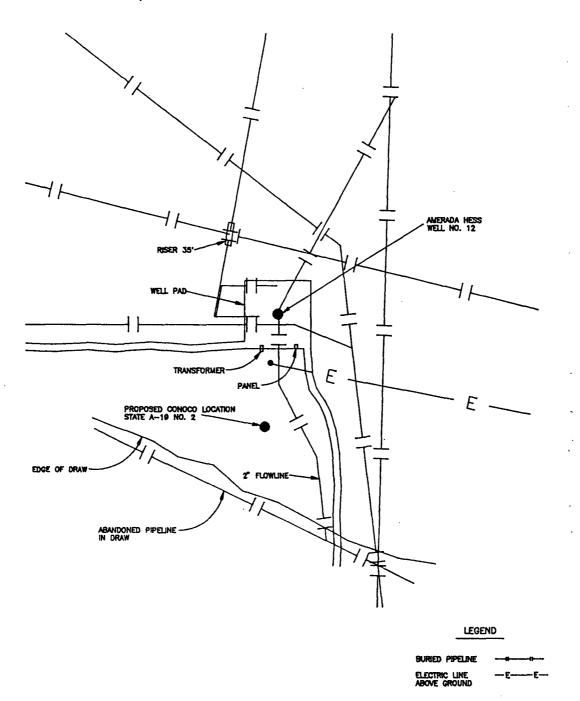
Form C-102 Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

District I PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD, Artosia, NM 68211-0719 District III 1000 Rio Braxos Rd., Axtee, NM 87410

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EXHIBIT B

SECTION 19, TOWNSHIP 19 SOUTH, RANGE 37 EAST, N.M.P.M. LEA COUNTY, NEW MEXICO



i hereby certify that this plat was prepared from an actual survey made on the ground and meets or exceeds all requirements for land surveys as specified by the state of New Mexico.

RESIDENCE SOUND LINES

Earl Foote Registered Professional Surveyor New Mexico Certificate No. 8278

CONOCO, INC.

Obstructions around or near Proposed Conoco Well Location State A-19 No. 2 in Section 19, T-19-S, R-37-E, N.M.P.M. Lea County, New Mexico

WEST TEXAS CONSULTANTS, INC.

ENGINEERS-PLANNERS	MIDLAND, TEXAS			
Survey Date: 8-16-94	Date: 8-23-94	Scale: 1" = 200'		
WTC No. 43815	Drawn By: R.S.	Sheet 1 of 1		

EXHIBIT C

OFFSET OPERATORS TO CONOCO'S STATE A-19 LEASE

Texaco Producing Inc. P.O. Box 3109 Midland, TX 77702 Amerada Producing Co. P.O. Box 840 Seminole TX 79360

Arrington Producing Co. P.O. Box 2071 Midland, TX 79701 Chevron P.O. Box 1150 Midland, TX 79702

Phillips Petroleum 4001 Penbrook Odessa, TX 79762

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Amerada Prod. Co. P.O. Box 840 Seminole, TX 79360

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Receipt for Certified Mail

No Insurance Coverage Provided Do not use for International Mail (See Reverse)

	Texaco Prod P.O. Box 310 Midland, Tex	09
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	Restricted Delivery Fee	
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Receipt for Certified Mail

No Insurance Coverage Provided Do not use for International Mail (See Reverse)

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Receipt for Certified Mail

No Insurance Coverage Provided

Do not use for International Mail

Phillips Petroleum 4001 Penbrook Odessa, TX 79762

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Receipt for Certified Mail

No Insurance Coverage Provided Do not use for International Mail

Arrington Producing Co. P.O. Box 2071 Midland, TX 79702

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