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September 15, 2014

2014 SEP 17 P 3: 03

Ms. Jami Bailey  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

DAVID S. RHODES

Re: **Case No. 14613**

Application of Apache Corporation and COG Operating LLC for Special Pool Rules and Regulations for the:

Artesia Glorieta-Yeso, Bear Grass Draw Glorieta - Yeso, Cedar lake Glorieta - Yeso, Empire Glorieta - Yeso, Fren Glorieta - Yeso, East Fren Glorieta - Yeso, Grayburg Jackson Seven Rivers - Queen - Grayburg - San Andres - Glorieta - Yeso (Paddock), Grayburg Jackson Seven Rivers - Queen - Grayburg - San Andres, Grayburg Jackson Yeso, North Leamex Paddock, Loco Hills Glorieta - Yeso, and West Maljamar Yeso Pools

Eddy and Lea Counties, New Mexico

Dear Ms. Bailey:

On behalf of Burnett Oil Co. Inc., an operator in several of the above referenced pools, I am writing to express our support of the above referenced application by Apache Corporation and COG Operating LLC.

Each one of these pools includes the Yeso formation and Burnett Oil Co., Inc. believes the current Yeso production allowable for such pools is insufficient to properly produce wells completed in this reservoir. The requested allowable will avoid wasting reservoir energy and will protect the correlative rights of owners.

Sincerely,

David S. Rhodes  
Vice President, Land