# STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

RECEIVED

IN THE MATTER OF THE APPLICATION OF EGL RESOURCES, INC. AND ROBERT LANDRETH FOR POOL EXTENSION FOR THE NORTH BELL LAKE-DEVONIAN GAS POOL, OR ALTERNATIVELY, FOR POOL CREATION AND SPECIAL POOL RULES, AND EXPANSION OF GAS SPACING AND PRORATION UNIT, LEA COUNTY, NEW MEXICO

JUL 1 1 2003

Oil Conservation Division

CASE NO. 13085

# AMENDED MOTION OF E.G.L. RESOURCES, INC. AND ROBERT LANDRETH FOR TEMPORARY SUSPENSION OF DRILLING PERMITS

E.G.L. Resources, Inc., ("EGL"), and Robert Landreth, ("Landreth"), hereby amend their June 26, 2003 motion seeking an order temporarily suspending, or holding in abeyance the approval of drilling permits for the Devon Energy Production Company Rio Blanco 33 Federal Well No. 1 and the Rio Blanco 33 Federal Well No. 2, both in Section 33, T-22-S, R-34-E, by the inclusion of an additional well within the scope of the motion, the Devon Energy Production Company Rio Blanco "9" State Well No. 1 located in Section 9, T-23-S, R-34-E. Devon is planning to locate its new Devonian well at a standard 320-acre gas well spacing unit location 660 feet FNL and 1575 feet FEL in the N/2 of Section 9. (*See* C-101, Exhibit 1, attached.)

Devon has not disclosed its plans to drill a third Devonian formation well to the Examiner. (See attached Exhibit A from a recent Devon motion.)

Devon's Rio Blanco "9" well will be the fourth penetration of a common source of supply when the appropriate well spacing and acreage dedication for Devonian formation reservoir development in the area have been made the central issues in two proceedings presently pending before the Oil Conservation Division and the Oil Conservation Commission.

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EGL's Rio Blanco well in Section 4 is currently drilling at a standard bottom hole location consistent with pool rules for 640-acre units with substantially greater setback requirements. Each of the three Devon wells are planned at locations inconsistent with 640-acre spacing. There is a reasonable likelihood that, if allowed to proceed, Devon's wells will disrupt the permissible development pattern for the reservoir if it is subsequently determined in the pending proceedings that 640-acre spacing is appropriate.

The revelation of Devon's previously undisclosed Rio Blanco "9" well underscores the need to temporarily suspend the approvals of the APD's for the three wells until the Division has had the opportunity to evaluate the technical evidence addressing the spacing issue.

Respectfully submitted,

MILLER STRATVERT P.A.

By:

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J. Scott Hall Attorneys for EGL Resources, Inc. and Robert Landreth Post Office Box 1986 Santa Fe, New Mexico 87504-1986 (505) 989-9614

#### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 11th day of July 2003, as follows:

Thomas Kellahin, Esq. Post Office Box 2265 Santa Fe, New Mexico 87504 Attorney for Devon Energy Production Company, LP

David Brooks, Esq. Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 98504

Carol Leach, Esq. Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 98504

David Catanach, Esq. New Mexico Oil Conservation Commission 1220 South St. Francis Drive Santa Fe, New Mexico 98504

7. Swy dall

J. Scott Hall

District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Ave., Artesia, NM 88210 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV 1220 S. St Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

# **APPLICATION FOR PERMIT TO DRILL**

Devon Energy	OGRID Number 6137	
20 N. Broadway	API Number	
Oklahoma City	30-25-36302	
Property Code	Property Name	Well No.
32482	RIO BLANCO 9 STATE	001

Surface Location									
UL or Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
В	9	238	34E		660	N	1575	E	Lea

Surface Location

# **Proposed Pools**

WILDCAT

Work Type	Well Type	Cable/Rotary	Lease Type	Ground Level Elevation	
New Well	Gas		State	3402	
Multiple	Proposed Depth	Formation	Contractor	Spud Date	
N	15000	Devonian		7/1/2003	

#### **Proposed Casing and Cement Program**

Туре	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	26	20	94	800	1450	0
Int1	17.5	13.375	68	3400	1250	0
Intl	17.5	13.375	68	5000	1250	0
Int2	12.25	9.625	43.5	8900	875	7000
Int2	12.25	9.625	53.5	12000	875	7000
Linerl	8.25	7.625	39	14400	400	11700
Liner2	6.5	5.5	17	15000	225	14100

### **Casing/Cement Program: Additional Comments**

20" Cmt w/1100 sx 35:65 Poz tailed by 350 sx Class C, 13 3/8" Cmt w/2000 sx 50:50 Poz Class C tail w/500sx 60:40 Poz Class C, 9 5/8" Cmt w/329 sx 35:65 Poz Class H tailed by 925sx 15:61:11 Poz Class C TOC @7000', 7 5/8 Cmt w/400 sx Class H, cement to top of liner, 5 1/2 Cmt w/225 sx Class H Cement to top of liner

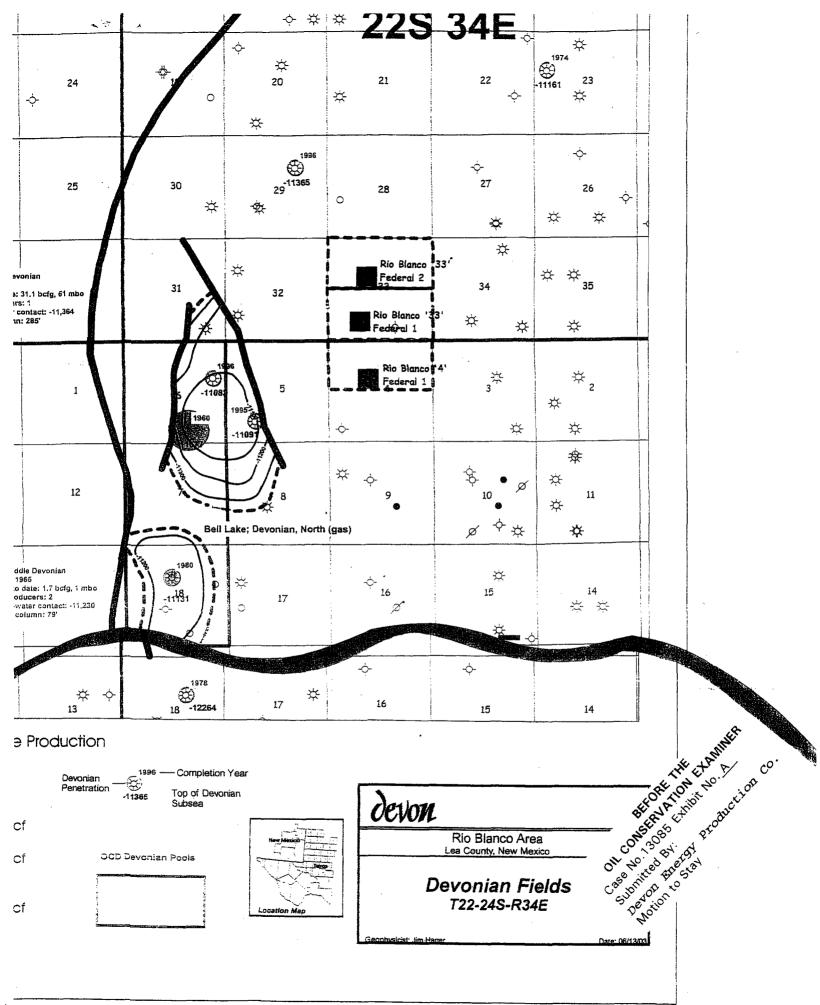
#### **Proposed Blowout Prevention Program**

Form C-101

http://www.emnrd.state.nm.us/ocdonline/

EXHIBIT 1

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