HOLLAND & HARTLE ATTORNEYS AT LAW

DENVER - ASPEN **BOULDER - COLORADO SPRINGS** DENVER TECH CENTER BILLINGS . BOISE CHEYENNE - JACKSON HOLE SALT LAKE CITY - SANTA FE WASHINGTON, D.C.

P.O. BOX 2208 SANTA FE, NEW MEXICO 87504-2208 110 NORTH GUADALUPE, SUITE 1 SANTA FE, NEW MEXICO 87501-6525 TELEPHONE (505) 988-4421 FACSIMILE (505) 983-6043

William F. Carr

wcarr@hollandhart.com

May 7, 2002

VIA HAND DELIVERY

Mr. David Catanach, Examiner Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Street Santa Fe, New Mexico 87505

> Case No. 12112 (Reopened): Application of Vanco Oil & Gas Corp. and its affiliate CBS Operating Corp. for amendment of Division Order No. R-11435 to authorize a pressure maintenance project in the North Square lake Unit Area, establish procedures for approval of additional injection wells, and for Qualification of the project area for the Recovered Oil Tax Rate pursuant to the Enhanced Oil Recovery Act,

Eddy County, New Mexico.

Dear Mr. Catanach:

Re:

On this date I provided by e-mail a copy of Vanco's proposed order in the above-referenced case. Finding 14 (B) on page 5 of this proposed order needs to be amended for it states that Vanco proposes to drill four additional injection wells in 2003. While Vanco may drill additional injection wells, it also may add injection to the unit by converting existing unit wells to injection. Accordingly, the first sentence of is paragraph should be amended to read as follows:

"(B) Additional Injection Wells: Vanco will use some of the existing injection wells in 2002 and proposes to add four additional injection wells in 2003, either by drilling new injection wells or by converting existing unit wells to injection (Testimony of Cotner, Tr. at 63-67, 75; Vanco Exhibit No. 7).

If you have questions concerning this matter, please advise.

Mr. David Cotner cc: Vanco Oil & Gas Corp.