## KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

JASON KELLAHIN (RETIRED 1991)

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

W. THOMAS KELLAHIN\*

December 4, 2000

#### Via Facsimile

Mr. David R. Catanach Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

NMOCD Case 12508 Re:

> Application of Burlington Resources Oil & Gas Company for a Dakota Infill Pilot Project for its San Juan 27-5 Unit Rio Arriba County, New Mexico

Dear Mr. Catanach:

On October 19, 2000, at the hearing of the referenced case, you directed that I supplement the record with additional information concerning the justification for the unorthodox well locations. In addition, you asked that I verify the well locations of the three (3) pilot wells to be drilled at standard locations. In response, I have the following:

- (1) Attached are copies of the C-102s for all eight (8) infill pilot wells:
- (2) Each well is predicated on being located among existing Dakota wells in such a way as to complete an appropriate pattern to obtain additional data for reservoir simulation modeling. It is necessary to locate them at locations not currently permitted by the pool rules. The wells are to be located among existing wells at locations in the reservoir which are potentially undrained by existing wells in order (i) to properly test for interference between and among wells; and (ii) to obtain appropriate pressure data.
- (3) In addition, of the five (5) wells at unorthodox well locations, the following two (2) wells had to be further adjusted because of surface limitations or topography:

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

Oil Conservation Division December 4, 2000 -Page 2-

- (a) San Juan 27-5 Well No. 90-F Section 16, T27N, R5W: there is no standard location in the NE/4 for this well because of Tucker Ridge.
- (b) San Juan 27-5 Well No. 123-F Section 17, T27N, R5W: is located near an existing road and because of steep topography could not be located at a standard location nor at a point equal distance from existing Dakota wells.

Please call me if you need anything further.

W. Thomas Kellahin

Very truly yours

cc: Burlington Resources Oil & Gas Company
Attn: Alan Alexander

District II PO Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Ad., Aztec, NM 87410

1980'

2777.28

765'

175

District IV PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

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

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AMENDED REPORT

			WELL	LOCATI	DA DIVA	CREAGE DEDI	CATION PL	AT		
'A	PI Number			'Pool Cod	е -		³Pool Name	?		
<u> 30-039-</u>			71599	9	Ва	sin Dakota				ļ
'Property	Code				Property					ll Number
7454					S NAUL NA	UNI		ĺ		40F
'OGRID	NO.				Operator				<b>°</b> E.	levation
14538			BURLI	NGTON	RESOURCES	OIL & GAS	COMPANY		E	5527
					<sup>10</sup> Surface	Location		<del></del>	<del></del>	
UL or lot no.	Sect ion	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/We	st line	County
Ν	16	27N	5W		1175	SOUTH	1980	WE	ST	RIO ARRIBA
		11 E	Bottom	Hole L	ocation I	f Different	From Surf	ace		
UL or lot no.	Sect ion	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/We	est line	County
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15			53	308.38						FICATION contained herein is knowledge and belief
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Signature E-290-3-M Peggy Cole Printed Name Regulatory Supervisor Title 02 40 Date Ŋ 18 SURVEYOR CERTIFICATION 537 I hereby certify that the well location shown on this pla-was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. E-290-38 SEPTEMBER 14, 2000 LAT: 35 \*34.2 N LONG: 107 \*22.0 W

2686.20

Centificate Number 2000 6857

District II PO Drawer OD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PC Box 2088, Santa Fe, NM 87504-2088

'API Number

DK-E/320

State of New Mexico Energy, Minerals & Natural Resources Department

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

<sup>2</sup>Pool Code

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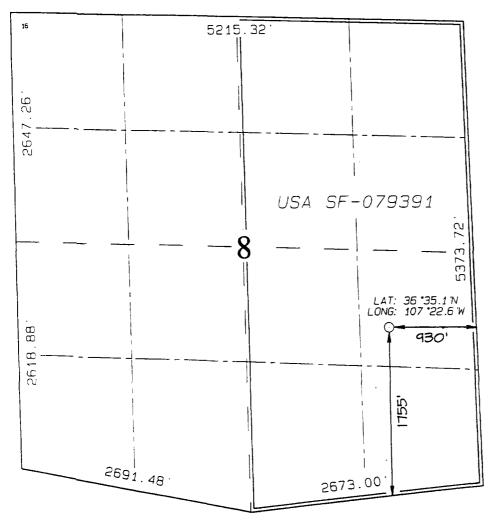
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AMENDED REPORT

## WELL LOCATION AND ACREAGE DEDICATION PLAT

7150		1						
7159	9	Basin Dakota						
	*Pro	operty Name		• We	11 Number			
	SAN JUA	N 27-5 UNIT			70F			
'OGRID No. Operator Name								
BURLI	NGTON RESOUR	RCES OIL & GAS	COMPANY	€	5719 ·			
	<sup>10</sup> Sunfa	ace Location		-				
Township Range	Lat Ian Feet from	the North/South line	Feet from the	East/West line	County			
27N 5W	175	5 SOUTH	930	EAST	RIO ARRIBA			
<sup>11</sup> Bottom	Hole Locatio	n If Different	From Surf	ace	-			
Township Range	Lot Idn Feet from	m the North/South line	Feet from the	East/West line	County			
13 Joint or Infill 14 Cons	solidation Code 15 Order	No.						
	Township Range 27N 5W  11 Bottom Township Range	SAN JUA  Opi  BURLINGTON RESOUR  SURTA  Opi  BURLINGTON RESOUR  SURTA  Township Range Lot Ion Feet from  27N 5W 175!  Opi  Township Range Lot Ion Feet from  Township Range Lot Ion Feet from	BURLINGTON RESOURCES OIL & GAS  10 Surface Location  Township Range Lot Ion Feet from the North/South line 27N 5W 1755 SOUTH  11 Bottom Hole Location If Different Township Range Lot Ion Feet from the North/South line	SAN JUAN 27-5 UNIT  *Operator Name BURLINGTON RESOURCES OIL & GAS COMPANY  *OSUMPACE LOCATION  *Township Range Lot Ion Feet from the North/South line Feet from the 27N 5W 1755 SOUTH 930  **It Bottom Hole Location If Different From Surf Township Range Lot Ion Feet from the North/South line Feet from the Feet from the	SAN JUAN 27-5 UNIT  **Operator Name BURLINGTON RESOURCES OIL & GAS COMPANY  **Operator			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



RESTS HAVE BEEN CONSOLIDATED BE DIVISION
TOPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief
-
Signature Peggy Cole
Printed Name Regulatory Supervisor
Title
<sup>18</sup> SURVEYOR CERTIFICATION I hereby certify that the well location shown on this pla was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.
SEPTEMBER 20, 2000 Date of Survey
Date of Survey EDMANDS

NORDESSION

6857

District II PO Drawer DD, Artesia. NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Box 2086, Santa Fe, NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

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AMENDED REPORT

			WEL		LOCATI	ON AND A	CREAGE DE	DICA	TION PL	ΤΑ		
1 0	ÞI Number				Pool Code	e  -	<del></del>		³Pool Nam	е		
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'Property	Code				_	*Property						1 Number
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UL or lat no.	Sect 100	Township	Ran	nge	Lot Ion	Feet from the	North/South lin	JE I	Feet from the	East/W	est line	County
12 Dedicated Acres	i	មា Joint or I	nf:11	<sup>14</sup> Conso	lidation Code	<sup>15</sup> Onder Na.						
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Sistrict II 20 Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Box 2088, Santa Fe, NM 87504-2088

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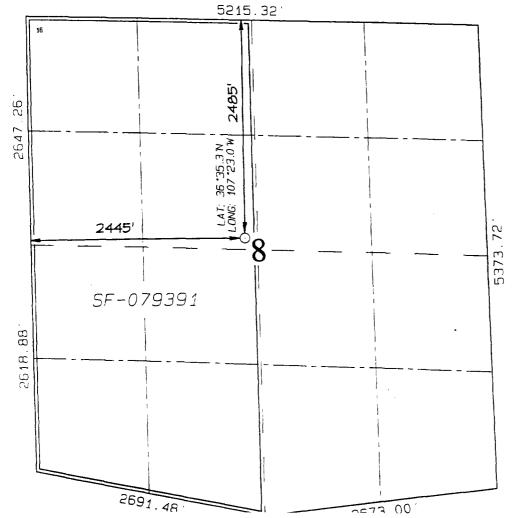
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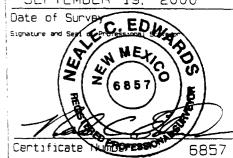
### WELL LOCATION AND ACREAGE DEDICATION PLAT

'A	PI Number			Pool Code	7	Pool Name						
30-039-	-		71599	)	Ваз	sin Dakota						
Property 7454	Code		<del>-</del>	S	Propert AN JUAN	y Name 27-5 UNIT			11 Number 112F			
'OGRID No.  *Operator Name  *Elevation 14538  BURLINGTON RESOURCES OIL & GAS COMPANY  5599												
				1	<sup>o</sup> Surface	Location			·····			
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County			
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DK-W/320		<u></u>			TO COMPLET		TNITEDERIC		<del></del>			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



1	OPERATOR CERTIFICATION
1	I hereby centify that the information contained herein is true and complete to the best of my knowledge and belief
	,
	•
!	
	Signature
	Peggy Cole
	Printed Name
	Regulatory Supervisor
	Title
	Date
<u>,</u>	18 SURVEYOR CERTIFICATION
Ì	I hereby certify that the well location shown on this pla
	was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and
	connect to the best of my belief.
	SEPTEMBER 19, 2000
Ì	
1	Date of Survey C. EDW



District II PO Drawer DD, Artesia, NM 88211-0719

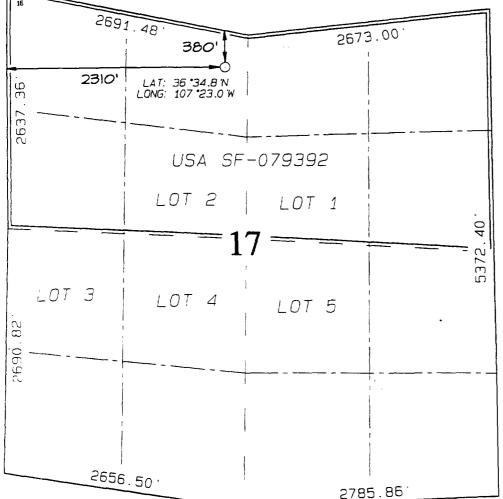
District III 1000 Rio Brazos Rd., Aztec. NM 87410

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AMENDED REPORT

			WELL	LOCATI	ON AND AC	CREAGE DEDI	CATION PL	ΑT		
¹ A	PI Number			Pool Cod	B	-	'Pool Name	=		<del></del>
30-039-			7159	9	Bas	sin Dakota				
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7454				S	S NAUL NA	7-5 UNIT			1	. 14F
'OGRID'	<b>1</b> 0 .				*Operator	Name			°E.	levat 100
14538	5		BURL I	NGTON	RESOURCES	OIL & GAS	COMPANY		E	6591 <sup>*</sup>
					<sup>10</sup> Surface	Location				
UL or lot no.	Sect 100	Township	Range	Lat Idn	Feet from the	North/South line	Feet from the	East/We	st line	County
C C	17	27N	5W		380	NORTH	2310	WE	ST	RIÓ ARRIBA
		<sup>11</sup> B	ottom	Hole L	ocation I	f Different	From Surf	ace		
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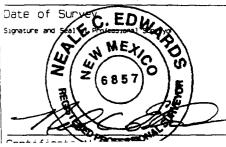


Signature		
Peggy Cole		
Printed Name		
Regulatory	Supervisor	
Title		
18		
Date		

SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this pic
was plotted from field notes of actual surveys made by m
or under my supervision and that the same is true and
cornect to the best of my belief.

SEPTEMBER 19, 2000



District II PO Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec. NM 87410

District IV PO Box 2088, Santa Fe, NM B7504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

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

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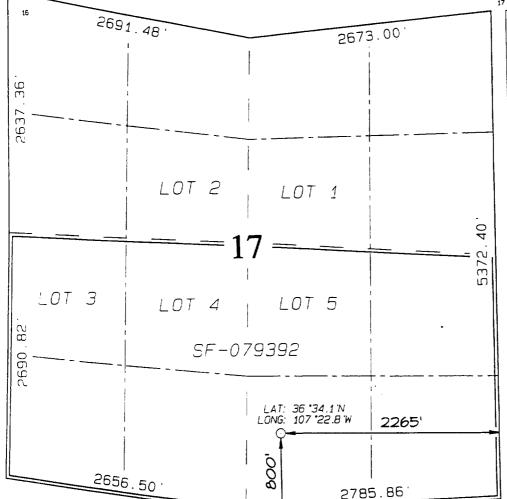
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AMENDED REPORT

### WELL LOCATION AND ACREAGE DEDICATION PLAT

Δ,	PI Number			'Pool Code			<sup>3</sup> Pool Name		
30-039-			7159	9	Ва	asin Dakota			
*Property	Code				*Proper	ty Name	• We	ell Number	
7454				SA	NAUL NA	27-5 UNIT		123F	
'OGRID N	₩.				*Operat	or Name	*E	levation	
14538		E	BURLI	NGTON I	RESOURCE	S OIL & GAS		6441	
				= 1 1	<sup>o</sup> Surface	Location			
UL or let no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0 -	1.7	27N	5W		800	SOUTH	2265	EAST	RIÓ ARRIBA
		<sup>11</sup> Bc	ttom	Hole L	ocation	If Different	From Surf	ace	
UL or lot no.	Section	Township	Range	Let Idn	Feet from the	North/South line	Feet from the	East/West line	County
12 Dedicated Acres		13 Joint or Infi	11 <sup>34</sup> Cons	solidation Code	<sup>15</sup> Order No.				
DK-S/330	.33								

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



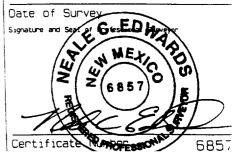
OPERATOR CERTIFICATION: I hereby certify that the information contained herein  $_{\rm 15}$  true and complete to the best of my knowledge and belief

Signature Peggy Cole Printed Name Regulatory Supervisor Title

Date SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this places as plotted from field notes of actual surveys made by  $m_{\rm c}$  or under my supervision, and that the same is true and connect to the best of my belief.

SEPTEMBER 20, 2000



District II PO Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Bex 2088, Santa Fe, NM 87504-2088

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AMENDED REPORT

				WELL	LOCAT:	ION AN	D ACI	REAGE DE	EDICA	ΔΤΙ	ON PL	ΑТ		
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District II PG Drawer CD, Artesia, NM 88211-0719

Eistrict III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

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AMENDED REPORT

# WELL LOCATION AND ACREAGE DEDICATION PLAT

<u></u>	'API Number	`	² Poo.	l Code	1			3 Pool Name			
30-039			71599		Basin	n Dakota					
'Propert					roperty N	lame				'We]	ll Number
7454				SAN JU	IAN 27	-5 UNIT				1	38F
'OGRID	No.				perator N						levation
14538		B 	URLING I	ON RESOL	JRCES ————	OIL & GAS	5 CON	1PANY 		<del></del>	391
			_	<sup>10</sup> Surf	ace L	ocation					
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12 Depicated Acr	res	- 30 Tut or Tutti	. ( (0.30110811	an code Unide	n nu.						
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