STEVENS OPERATING CORPORATION

1250 UNITED BANK PLAZA

P. O. BOX 2408

ROSWELL, NEW MEXICO 88201

505-622-7273

November 21, 1988

(Cas 9561

New Mexico Oil Conservation Division 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

RE: APPLICATION OF STEVENS OPERATING CORPORATION FOR AN ORDER APPROVING AN UNORTHODOX WELL LOCATION, TWINLAKES DEVONIAN POOL, CHAVES COUNTY, NEW MEXICO

COMES NOW, Stevens Operating Corporation, and applies to the Oil Conservation Division of the State of New Mexico for the approval of an order authorizing an unorthodox well location designated the Stevens Operating Corporation O'Brien "C" #9 located 1870 feet from the North line and 80 feet from the West line of Section 1, Township 9 South, Range 28E, Twinlakes Devonian Pool, Chaves County, New Mexico and in support thereof, Applicant would show Division:

- l. Stevens Operating Corporation has the operating rights in the NW/4 of Section 1, and NE/4 of Section 2, above Township and Range and is proposing to drill the above named well in search of oil and gas from the Siluro-Devonian formation.
- 2. Subject location is based on Vibroseis date which shows a North/South Siluro-Devonian structure of approximately 100+ feet of closure. The limited areal size and relief of this closure plus a possible small percentage of fill-up makes it imperative that the proposed location be at the highest vibration point on the seismic data in said proration unit, subject point being 1870 feet from the North line and 80 feet from the West line of Section 1, above Township and Range.
- 3. As is obvious from the enclosed structure map a well at a standard location 660' from the West line of the proration unit would be low to the O'Brien "C" #4, one location south, which was drilled too low and too close to the Oil-Water contact resulting in a non-commercial well. Unless a well can be drilled at this unorthodox location the owners under the proration unit will be deprived of the right to recover the reserves underlying the tract.

4. Applicant is enclosing a seismic structure map on the top of the Siluro-Devonian (Fusselman) together with land data clearly showing all deep rights offset operators. All such operators offsetting the unit have been notified of the Application by certified mail.

WHEREFORE Applicant hereby applies for Administrative approval of this unorthodox well location for Siluro-Devonian production as requested above.

Respectfully submitted,

STEVENS OPERATING CORPORATION

Patricia Thompson Greenwade

General Manager

PTG/sp Enclosures

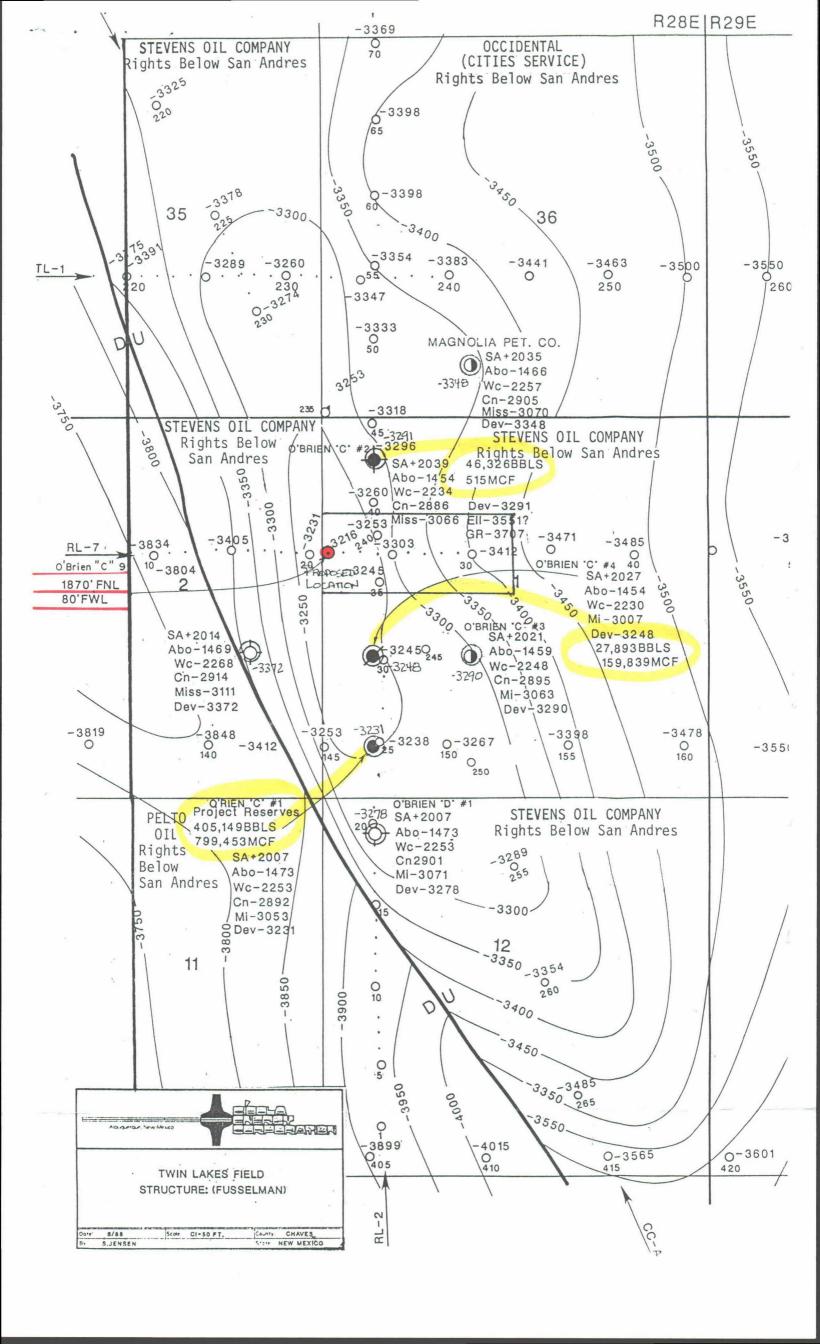
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DITIONS OF APPROVAL, IF ANTI

NEW MEXICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102 Supersedes C-128 Effective 1-1-65

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(Devaniaa) +24+ +36+ -12-+25+ Description: A11 Sec. 1; 6/2 Sec. 2, (8.55,6-29-51). 14 - 26-COUNTY Chaves POOL Twin Lakes -15--22--127-34-10 TOWNSHIP 9-502, LA RANGE 28- East -16 -- 29-20-35 +30+ +18+ 19-

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Regulations of Rule 104 of the Commission Rules and Regulations norminisationing the fact said pool was created and defined proto to November 1, 1975.

IT IS PURTHER ORDERED.

IT IS FURTHER ORDERED.

IT IS FURTHER ORDERED.

IT IS THAT the hocations of all wells presently drilling to or completed in the East Carlsbad-Wolfcamp Gas Pool or in the Wolfcamp formation within one mite there for a re hereby approved, that the operator of any well having an unorthodox location shall notify the Arresia District Office of the Commission in Writing notify the Arresia District Office of the Commission in Writing (2). That, pursuant to Paragraph A. of Section 65-3-14.5.

NMSA 1983, contained in Chapter 271, Laws of 1989, all existing wells in the East Carlsbad-Wolfcamp Gas Pool shall have dedicated thereit 230 acres in accordance with Rule 104 of the Commission Rules and Regulations; or pursuant to Paragraph C. of sand Section 65-1-45, existing wells may have nonstandard units dedicated therefore.

Failure to file new Forms C-102 with the Commission dedicated that 200 acres to a well or toothain a non-standard unit approved the Standard Standard Commission within 80 days from the effective date of this order shall subject the well to canceldation of allowable order shall subject the well to canceldation of allowable order shall subject the well to canceldation of allowable of such further orders as the Commission may deem necessary.

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DONE at Santa Fe, New Mexico, on the day and year herein above designated

TWIN LAKES-DEVONIAN POOI

Order No. R-5142. Adopting Temporary Operating Rules for the Twin Lakes-Devonian Pool, Chaves County, New Mexico, January 6, 1976, as Amended by Order No. R-5142-A, February 15, 1977.

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Order No R-5142-A, February 15, 1977, makes permanent the temporary rules adopted in Order No. R-5142.

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Application of Stevens Oil Company for Special Pool Rules, Chaves County, New Mexico.

CASE NO. 5599 Order No. R-5142

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ORDER OF THE COMMISSION

BY THE COMMISSION: This cause came on for hearing at 9 a.m. on December 17, 1975, at Santa Fe, New Mexico, before Examiner Daniel S. Nutter:
NOW, on this 6th day of January, 1976, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises.

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

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(2) That the applicant, Stevens Oil Company, seeks the promulgation of special rules and regulations for the Twin Lakes-Devoina Pool, Chaves County, New Mexico, including provisions for 80-acre oil proration units and exemption of said pool from any gas-oil ratto limitation.

(3) That producing the subject pool without any gas-oil ratio limitation may result in the waste of reservoir energy and a violation of correlative rights.

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(4) That the establishment of a special gas-oil ratto limitation of 4000 cubs. feet of gas for each barrel oil will afford to the owner of each property in the subject pool the opportunity to produce his just and equitable share of the oil and gas and will not cause waste nor violate correlative rights, provided the flaring or ventug of gas in the pool is prohibited.

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(TWIN LAKES-DEVONIAN POOL, - Cont'd.)

R W. Byram & Co.,

offsetting the proposed location shall be notified of the application has registered or earthful mai, and the application shall state that such notice has been firmished. The secretary-Intercon may approve the application upon receipt of written waivers from all operators offsetting the proposed location of it no operators offsetting the proposed location of it no operators offsetting the proposed location of it no operator is the unorthodox location has been entered within 20 days after the Secretary Director has received the application

RULE 6. A standard proration unit (79 through 81 acress shall be assigned a depth bracket allowable. 6 227 harrels, subject to the market demand proceduate factor, and in the event there is more than one well on an 80-serie proration unit the operator may produce the allowable assigned to the unit from the wells on the unit in any proportion.

The allowable assigned to a non-standard preciation unit shall bear the same ratio to a standard allowable as the acreage in such non-standard unit bears to 80 acres

RULE 7. (As Amended by Order No. R-5142-A February 15, 1977.) The Immine gas-only ratus shall be 2006 cuber feet of 1897. The Immine gas-only produced.

RULE 8. No gas shall be flared on vented on or after the effective date of this order, provided however, that any well compilered in the subject pool after the effective date of this order, shall be given 30 days, in which to make beneficial use of the produced examined gas.

RULE 9. The Secretary-Director of the Commission may grant an exception to the requirements of ktule without notice and hearing when an application has been filed setting forth the facts and circumstances, justifying the exception and he deteriantes such action is necessary to prevent waste or protect correlative fights.

IT IS FURTHER ORDERED.

(i) That the locations of all wells presentiv drilling to or completed in the Twin Lakes-becomen Pool or in the Deconnan formation within one mile thereof are hereby approved, that the operator of any well having an unorthodox locations shall northy the Arteria district office of the Commission in writing of the amme and location of the well on or before February 1, 1976

(2) That, pursuant to Parapraph A. of Section 65-3-14.5. NMSA 1953, contrained in Chapter 271. Laws of 1969, existing wells, in the Twin Lakes-Deoman Peot shall have dedicated thereto 80 acres in accordance with the foregoing pool rules, or, pursuant to Parapraph C. of staid Section 65-3-14 5, existing wells may have non-standard spacing or provation units established by the Commission and dedicated thereto.

Failure to file new Forms C-102 with the Commission dedicating 80 acrees to a well or to obtain an on-standard unit approved by the Commission within 60 days from the date of this order shall is tablect the well to carefalation of allowable Unit said Form C-102 his been filed or until a non-standard unit has been approved, and subject to said 60-day limitation, each well presently drilling to or completed in the Twin Lakes. Devonan Pool or in the Devonan formation within one mile thereof shall receive no more than one-half of a standard allowable for the pool.

(3) That this case shall be reopened at an examiner hearing in January. 1977, at which time the operators in the subject pool may appear and show cause why the Twin Lakes-Devonian Peol should not be developed on 40-acre spacing units and why the limiting gas-oil ratto should not revert to 2000 to one.

is cause is retained for the as the Commission may deem of this at jurisdiction of the (4) That j entry of such necessary. DONE at Santa Fe, New Mexico, on the day and year hereinove designated.

(2)

the critising of unnecessary wells, to avoid the augmentation of risk arising from the drilling of an excessive number of wells, to prevent reduced recovery which might result from the printer correlative rights, and to otherwise prevent waste and protect correlative rights, temporary special rules and regulations preventing for 80-acre specing units should be promitted at the Taxis. That in order to prevent the economic loss caused by illing of unnecessary wells, to avoid the augmentation

(6) That the temporary special rules and regulations should provide for limited well locations, in order to assure orderly everlopment of the pool and protect correlative rights.

(7) That the temporary special rules and regulations, should be established for a one-year period in order to allow the operators in the subject pool to gather reservoir information to establish the area that can be efficiently and economically framed and developed by one well.

(8) That this case should be reopened at an examiner hearing in January. 1977, at which time the operators in the subject pool, should be prepared to appear and show cause why the Twin Lakes-Devonian Pool should not be developed on 40-aerer spacing units, and why the limiting gas-oil ratio should not revert to the Statewide limit of 2000 to one

IT IS THEREFORE ORDERED

the That temporary Special Rules and Regulations for Twin Lakes-Devonian Pool. Chaves County, New Mexico. a hereby promulgated as follows.

SPECIAL RULES AND REGULATIONS FOR THE TWIN LAKES-DEVONIAN POOL

RULE 1. Each well completed or recompleted in the Twin Lakes, bevoining bool or the Devoinin formation within one mult thereof, and not nearer to or within the limits of another designated Devoinian oil pool, shall be spaced, drilled, operated, and produced in accordance with the Special Rules and Regulations betweendrifter set forth.

RULE 2 Each well shall be located on a standard unit containing 80 acres, more or less, consisting of the N/2, S/2, E/2, or W/2 of a governmental quarter section; provided, however, that nothing contained herein shall be constitued as probibiting the drilling of a well on each of the quarter-quarter sections in the unit.

RULE 3. The Secretary-Director of the Commission may grant an exception to the requirements of Rule 2 without notice and hearing when an application has been filed for a non-standard unit comprising a governmental quarter-quarter section or lot, or the unorthook size or Shape of the tract is due to a variation in the legal subdivision of the United States Public Land Surveys. All operators of selecting the proposed non-standard unit shall be notified of the application by registered or certified mail, and the application shall state that such notice has been furnished. The Secretary-Director may approve the application upon receipt of written waivers from all offset operators. On the objection to the formation of the non-standard unit within 30 days after the Secretary-Director has received the application.

of the unit RULE 4 Each well shall be located within 150 feet orenter of either quarter-quarter section in the 80-acre RULE 5. The Secretary Director may grant an exception to the requirements of Real 4 without notice and hearing when an application has been filed for an unorthodox location necessitated by topographical condutions or the recompletion of a well previously drilled to another horizon. All operators

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