

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

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June 9, 1999

HAND DELIVERED

David R. Catanach
Hearing Examiner
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
2040 south Pacheco Street
Santa Fe, New Mexico 87504

01 CONSERVATION DIV
99 JUN -9 AM 9:52

Re: **Case 12113** Application of GP II Energy, Inc. for Statutory Unitization of the
North Square Lake Unit Area, Eddy County, New Mexico

Dear Mr. Catanach:

Enclosed for your consideration is GP II Energy, Inc.'s proposed Order of the Division approving statutory unitization of the North Square Lakes Unit Area. As you will note, this Order prohibits the commencement of injection in the unit area until the proposed unit waterflood project has been approved by the Division.

The proposed waterflood project is the subject of Division Case 12112. Pursuant to your letter of May 17, 1999, GP II Energy, Inc. will request this case be reopened and that the enhanced oil recovery project in the North Square Lake Unit be approved in specific phases for defined areas within the Unit. GP II Energy, Inc. will request that injection be permitted within any phase only after all data required by Division Form C-108 has been supplied, all Division required remedial work has been performed on all wells within each area of review for each injection well has been completed and the Division has authorized GP II Energy, Inc. to commence injection.

GP II Energy, Inc. has advised me that upon receipt of a Division Order approving Statutory Unitization, funds will be available to it to commence the drilling of new producing wells in the Unit Area. If this approval is not obtained within the next ten days, funding for this

David R. Catanach
Hearing Examiner
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
June 9, 1999
Page 2

99 JUN -9 AM 9:52
OIL CONSERVATION DIV.

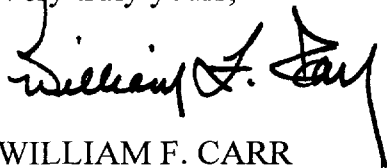
project may be lost and the project abandoned. For this reason we request that an Order be entered at the earliest possible time.

On February 1, 1999 the Bureau of Land Management has designated the proposed unit area as an area logically suited for development under a unit plan and on May 7, 1999 the Commissioner of Public lands gave preliminary approval to the unit. Copies of these approvals are included for your easy reference.

Representatives of GP II Energy, Inc. are available to discuss this matter with you at any time.

Your attention to this matter is appreciated.

Very truly yours,



WILLIAM F. CARR
Attorney for GP II Energy, Inc.

WFC:mlh
Enc.

cc: M. A. Sirgo
George Mitchell

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

**IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:**

Case No. 12113

Order No. R-_____

**APPLICATION OF GP II ENERGY, INC.
FOR STATUTORY UNITIZATION OF
THE NORTH SQUARE LAKE UNIT AREA,
EDDY COUNTY, NEW MEXICO.**

**GP II ENERGY, INC.'S PROPOSED
ORDER OF THE DIVISION**

OIL CONSERVATION DIV.
99 JUN -9 AM 9:52

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on February 4, 1999, at Santa Fe, New Mexico, before Examiner David R. Catanach.

NOW, on this _____ day of June, 1999, the Division Director, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS THAT:

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

(2) The applicant, GP II Energy, Inc. ("GP II ENERGY") seeks the statutory unitization, pursuant to the "Statutory Unitization Act", Sections 70-7-1 through 70-7-21, N.M.S.A. (1978), of 6155.96 acres, more or less, of State and Federal lands comprised of the following described acreage in Eddy County, New Mexico:

TOWNSHIP 16 SOUTH, RANGE 30 EAST, NMPM

Section 25: E/2

Section 36: N/2

TOWNSHIP 16 SOUTH, RANGE 31 EAST, NMPM

Section 19: S/2

Section 20: S/2

Section 27: SW/4, S/2 NW/4, NW/4 NW/4, S/2 SE/4,
NW/4 SE/4, SW/4 NE/4

Sections 28 through 34: All

GP II Energy further seeks approval of the Unit Agreement and the Unit Operating Agreement for the North Square Lake Unit.

(3) The proposed unit shall be known as the North Square Lake Unit and the Unit Area should be designated the North Square Lake Unit Area ("the Unit Area").

(4) The vertical limits of the formations to be included within the proposed Unit Area extends from the top of the Grayburg formation to the base of the San Andres formation as seen on the Type Log from the Zephyr ZQ State Well No. 1 located 330 feet from the North line and 2310 feet from the East line (Unit B) of Section 32, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico and is the interval from 3050 feet to 4206 feet below the surface measured from the derrick floor which is at an elevation of 3937.5 feet.

(5) Staples Oil Company and K. M. Jones Oil Company appeared through their attorney but did not present evidence in opposition to the proposed unitization nor to the vertical limits of the proposed Unit Area.

(6) The Unit Area contains 45 separate tracts owned by approximately 28 different working interest owners.

(7) As of the date of hearing, the owners of over 80% of the working interest (and over 45% of the royalty interest) were effectively committed to the unit or have balloted to support the unit.

(8) GP II Energy will seek authority to institute an enhanced recovery project, for the recovery of oil and associated gas, condensate, and all associated liquefiable hydrocarbons, within and to be produced from the proposed Unit Area in Case No. 12112.

(9) Enhanced recovery operations by waterflood should result in additional recovery from the Unit Area of approximately 11.2 million barrels of oil.

(10) The unitized management, operation and further development of the Unit Area, as proposed, is reasonable and necessary to effectively and efficiently carry on enhanced recovery operations and will substantially increase the ultimate recovery of oil and gas from the unitized formation.

(11) The proposed unitized method of operation as applied to the Unit Area is feasible and will result with reasonable probability in the increased recovery of substantially more oil from the unitized portion of the pool than would otherwise be recovered without unitization.

(12) The estimated additional cost of the proposed unitized operations within the Unit Area will not exceed the estimated value of the additional oil and gas plus a reasonable profit.

(13) The applicant, designated operator of the Unit Area pursuant to the Unit Agreement and Unit Operating Agreement, has made a good faith effort to secure voluntary unitization within the Unit Area.

(14) The participation formulas contained in the Unitization Agreement, allocate the produced and saved unitized substances to the separately owned tracts in the Unit Area, on a fair, reasonable and equitable basis.

(15) Unitization and the adoption of the proposed unitized methods of operation will benefit the working interest owners and the royalty interest owners of the oil and gas rights within the Unit Area.

(16) The North Square Lake Unit Agreement and Unit Operating Agreement, as applied to the Unit Area, provide for unitization and unit operation of the Unit Area upon terms and conditions that are fair, reasonable and equitable and which include:

- (a) An allocation to the separately owned tracts in the Unit Area of all oil and gas that is produced from the Unit Area and which is saved, being the production that is not used in the conduct of unit operations or not unavoidably lost;
- (b) A provision for the credits and charges to be made and the adjustment among the owners in the Unit Area for their respective investments in wells, tanks, pumps, machinery, materials and equipment contributed to the unit operations;
- (c) A provision governing how the costs of unit operations, including capital investments, shall be determined and charged to the separately owned tracts and how said costs shall be paid, including a provision providing when, how, and by whom the unit production allocated to an owner who does not pay his share of the costs of unit operations shall be charged to such owners, of the interest of such owners, and how his interest may be sold and the proceeds applied to the payment of his costs;
- (d) A provision designating the unit operator and providing for the supervision and conduct of the unit operations, including the selection, removal

or substitution of an operator from among the working interest owners to conduct the unit operations;

- (e) A provision for a voting procedure for the decision of matters to be decided by the working interest owners in respect to which each working interest owner shall have a voting interest equal to his unit participation; and
- (f) The time when the unit operations shall commence and the manner in which, and the circumstances under which, the unit operations shall terminate and for the settlement of accounts upon such termination.

(17) The statutory unitization of the North Square Lake Unit Area is in conformity with the above findings, and will prevent waste and will protect the correlative rights of all owners of interest within the proposed Unit Area, and should be approved.

IT IS THEREFORE ORDERED THAT:

(1) The North Square Lake Unit Area comprising 6155.96 acres, more or less, of State and Federal lands in Eddy County, New Mexico, is hereby approved for statutory unitization pursuant to the Statutory Unitization Act, Sections 70-7-1 through 70-7-21, NMSA, (1978).

(2) The lands included within the North Square Lake Unit shall comprise:

TOWNSHIP 16 SOUTH, RANGE 30 EAST, NMPM

Section 25: E/2

Section 36: N/2

TOWNSHIP 16 SOUTH, RANGE 31 EAST, NMPM

Section 19: S/2

Section 20: S/2

Section 27: SW/4, S/2 NW/4, NW/4 NW/4, S/2 SE/4,
NW/4 SE/4, SW/4 NE/4

Sections 28 through 34: All

(3) The vertical limits of the formations to be included within the proposed Unit Area extends from the top of the Grayburg formation to the base of the San Andres formation as seen on the Type Log from the Zephyr ZQ State Well No. 1 located 330 feet from the North line and 2310 feet from the East line (Unit B) of Section 32, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico and is the interval from 3050 feet to 4206 feet below the surface measured from the derrick floor which is at an elevation of 3937.5 feet.

(4) The applicant shall not institute a waterflood project for the secondary recovery of oil, gas and all associated liquefiable hydrocarbons within and produced from the Unit Area, until the enhanced recovery project, which is currently the subject of Case No. 12112, has been approved by the Division.

(5) The Unit Agreement and the Unit Operating Agreement for the North Square Lake Unit, presented as evidence in this case, are hereby incorporated by reference into this Order.

(6) The Unit Agreement and the Unit Operating Agreement for the North Square Lake Unit provide for unitization and unit operation of the Unit Area upon terms and conditions that are fair, reasonable and equitable and include:

- (a) An allocation to the separately owned tracts in the Unit Area of all oil and gas that is produced from the Unit Area and which is saved, being the production that is not used in the conduct of unit operations or not unavoidably lost;

- (b) A provision for the credits and charges to be made and the adjustment among the owners in the Unit Area for their respective investments in wells, tanks, pumps, machinery, materials and equipment contributed to the unit operations;
- (c) A provision governing how the costs of unit operations, including capital investments, shall be determined and charged to the separately owned tracts and how said costs shall be paid, including a provision providing when, how, and by whom the unit production allocated to an owner who does not pay his share of the costs of unit operations shall be charged to such owners, of the interest of such owners, and how his interest may be sold and the proceeds applied to the payment of his costs;
- (d) A provision designating the unit operator and providing for the supervision and conduct of the unit operations, including the selection, removal or substitution of an operator from among the working interest owners to conduct the unit operations;
- (e) A provision for a voting procedure for the decision of matters to be decided by the working interest owners in respect to which each working interest owner shall have a voting interest equal to his unit participation; and
- (f) The time when the unit operations shall commence and the manner in which, and the circumstances under which, the unit operations

shall terminate and for the settlement of accounts
upon such termination.

(7) This Order shall not become effective unless and until the owners of seventy-five (75) percent of the working interest and seventy-five (75) percent of the royalty interest in the Unit Area have approved the plan for unit operations as required by Section 70-7-8 NMSA, (1978) Comp.

(8) If the persons owning the required percentage of interest in the Unit Area as set out in Section 70-7-8 NMSA, (1978) Comp., do not approve the plan for unit operations within a period of six (6) months from the date of entry of this Order, this Order shall cease to be of further force and effect and shall be revoked by the Division, unless the Division shall extend the time for ratification for good cause shown.

(9) When the persons owning the required percentage of interest in the Unit Area have approved the plan for unit operations, the interests of all persons in the Unit Area are unitized whether or not such persons have approved the plan of unitization in writing.

(10) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY
Director

S E A L



COMMERCIAL RESOURCES
(505)-827-5724

SURFACE RESOURCES
(505)-827-5783

MINERAL RESOURCES
(505)-827-5744

ROYALTY
(505)-827-5772

**State of New Mexico
Commissioner of Public Lands**

Ray Powell, M.S., D.V.M.
310 Old Santa Fe Trail, P. O. Box 1148
Santa Fe, New Mexico 87504-1148
Phone (505)-827-5760, Fax (505)-827-5766

PUBLIC AFFAIRS
(505)-827-5785

ADMINISTRATIVE MGMT.
(505)-827-5700

LEGAL
(505)-827-5713

PLANNING
(505)-827-5752

May 7, 1999

GP II Energy, Inc.
P. O. Box 50682
Midland, Texas 79710

Attention: Mr. M. A. Sirgo, III

Re: North Square Lake Unit
Eddy County, New Mexico

This office has reviewed the unexecuted copy of unit agreement, which you have submitted for the proposed North Square Lake Unit Area, Eddy County, New Mexico. This agreement meets the general requirements of the Commissioner of Public Lands and has this date granted you preliminary approval as to form and content.

Our preliminary approval is given subject to a stipulation to be made a part of our final approval requiring that the Operator shall, within four years following the effective date of the North Square Lake Unit, submit for the Commissioner's review the fresh water requirements for this unit. A review of the unit's fresh water requirement will continue to be submitted for the Commissioner's review every three years thereafter.

Preliminary approval shall not be construed to mean final approval of this agreement in any way and will not extend any short term leases, until final approval and an effective date have been given.

When submitting your agreement for final approval, please submit the following:

1. Application for final approval by the Commissioner setting forth the tracts that have been committed and the tracts that have not been committed.
2. All ratifications from the Lessees of Record and Working Interest Owners. All signatures should be acknowledged by a notary and one set must contain original signatures.
3. Order of the New Mexico Oil Conservation Division and approval by the Bureau of Land Management. Our approval will be conditioned upon subsequent favorable approval by the New Mexico Oil Conservation Division and the Bureau of Land Management.
4. A copy of the Unit Operating Agreement.
5. A copy of your Initial Plan of Operation.
6. A re-designation of well names and numbers.
7. The filing fee for a unit agreement is \$30.00 dollars for every section of partial section thereof. Please submit an additional \$300 filing fee.

"WE WORK FOR EDUCATION"

JUN - 9 AM 9:52
OIL CONSERVATION DIV.

GP II Energy, Inc.
May 7, 1999
Page 2

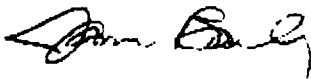
8. On page 16, Effective Date and Term, the second paragraph states the following: If this agreement does not become effective on or before January 1, 1999, it shall ipso facto expire on said date (hereinafter called "Expiration Date"). Since this date has already passed, a more appropriate date is recommended
9. On Exhibit "B", Tract Number 29A, the correct section number is 36-16S-30E, S/2NE/4. Also, the correct lessee of record is Cities Service Oil and Gas Corp. and Cull Brothers

If you have any questions or if we may be of further help, please contact Pete Martinez at (505) 827-5791

Very truly yours,

RAY POWELL, M.S., D.V.M.
COMMISSIONER OF PUBLIC LANDS

BY:



JAMI BAILEY, Director
Oil, Gas and Minerals Division
(505) 827-5744

RP/JB/pm

pc: Reader File
OX'D-Attention: Roy Johnson
BLM-Roswell, Attention Mr. Armando Lopez

99 JUN -9 AM 9:52
OIL COMMISSION DIV



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ROS WELL FIELD OFFICE
2909 West Second Street
Roswell, New Mexico 86201-2019

IN REPLY REFER
W000101360X
3100 (06200)

FEB 01 1988

59 JUN -9 AM 9:52

OIL COMPLETION DIV

GP II Energy, Inc.
Attention: M. A. (Manny) Sirgo III
P. O. Box 30682
Midland, TX 79710

Gentlemen:

Your application of December 18, 1986, filed with the BLM requests the designation of the North Square Lake Unit area, embracing 6125.30 acres, more or less, Eddy County, New Mexico, as logically subject to secondary recovery operations under the unitization provisions of the Mineral Leasing Act as amended.

Pursuant to unit plan regulations 43 CFR 3180, the land requested as outlined on your plat marked Exhibit A, GP II Energy, Inc., North Square Lake Unit, Eddy County, New Mexico, is hereby designated as a logical unit area and has been assigned No. W000101360X. This designation is valid for a period from one year from the date of this letter.

Waterflooding will be limited to the following interval: That interval underlying the Unit Area, the vertical limits of which extend from the top of the Grayburg formation to the base of the San Andres formation as seen on the Type Log from the Wephyr 20 State #1 located at 330' FNL and 2310' FNL, Section 32, T. 16 S., R. 31 E., and is that interval which is correlative to the interval from 3050' to 4206' below the surface measured from the derrick floor. The derrick floor elevation is 3937.5'.

Your basis for allocation of unitized substances and your proposed form of unit agreement are acceptable, however, the total acreage shown on page 2, section 2 (a) of the agreement should be changed to 6125.30 acres. Corrections that need to be made to the enclosed Exhibits "A" and "B" are marked in red. Exhibits "B-2" and "C" also need to be revised to reflect the tracts that have changed numbers and the correct unit acreage.

If conditions are such that modification of said standard form is deemed necessary, two copies of the proposed modifications with appropriate justification must be submitted to this office for preliminary approval.

In the absence of any type of land requiring special provisions or any objections not now apparent, a duly executed agreement identical with said form, modified as outline above, will be approved if submitted in approvable status within a reasonable period of time. However, notice is hereby given that the right is reserved to deny approval of any executed agreement submitted which in our opinion, does not have the full commitment of sufficient lands to afford effective control of operations in the unit area.

When the executed agreement is transmitted to the BLM for final approval, include the latest status of all acreage. In preparation of Exhibits "A" and "B", follow closely the format of the sample exhibits attached to the reprint of the aforementioned form. You will also need to submit an initial Plan of Operations and a list showing the old well names and numbers and the new well names and numbers.

Inasmuch as this unit agreement involves State land, we are sending a copy of the letter to the Commissioner of Public Lands. Please contact the State of New Mexico before soliciting joinders regardless of prior contacts or clearances from the state.

Sincerely,



Gary A. Stephens
Acting Assistant Field Office Manager,
Lands and Minerals

Enclosures

99 JUN -9 AM 9:52

DL COM STATION DM



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ROSWELL FIELD OFFICE
2909 West Second Street
Roswell, New Mexico 88201-2019

IN REPLY REFER
NMNM101360X
3180 (06200)

FEB 01 1999

GP II Energy, Inc.
Attention: M. A. (Manny) Sirgo III
P. O. Box 50682
Midland, TX 79710

Gentlemen:

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Pursuant to unit plan regulations 43 CFR 3180, the land requested as outlined on your plat marked Exhibit A, GP II Energy, Inc., North Square Lake Unit, Eddy County, New Mexico, is hereby designated as a logical unit area and has been assigned No. NMNM101360X. This designation is valid for a period from one year from the date of this letter.

Waterflooding will be limited to the following interval: That interval underlying the Unit Area, the vertical limits of which extend from the top of the Grayburg formation to the base of the San Andres formation as seen on the Type Log from the Zephyr ZQ State #1 located at 330' FNL and 2310' FEL, Section 32, T. 16 S., R. 31 E., and is that interval which is correlative to the interval from 3050' to 4206' below the surface measured from the derrick floor. The derrick floor elevation is 3937.5'.

Your basis for allocation of unitized substances and your proposed form of unit agreement are acceptable, however, the total acreage shown on page 2, section 2 (a) of the agreement should be changed to 6125.30 acres. Corrections that need to be made to the enclosed Exhibits "A" and "B" are marked in red. Exhibits "B-2" and "c" also need to be revised to reflect the tracts that have changed numbers and the correct unit acreage.

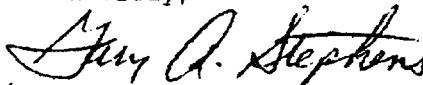
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When the executed agreement is transmitted to the BLM for final approval, include the latest status of all acreage. In preparation of Exhibits "A" and "B", follow closely the format of the sample exhibits attached to the reprint of the aforementioned form. You will also need to submit an initial Plan of Operations and a list showing the old well names and numbers and the new well names and numbers.

Inasmuch as this unit agreement involves State land, we are sending a copy of the letter to the Commissioner of Public Lands. Please contact the State of New Mexico before soliciting joinders regardless of prior contacts or clearances from the state.

Sincerely,



Gary A. Stephens
Acting Assistant Field Office Manager,
Lands and Minerals

Enclosures

BEFORE THE
OIL CONSERVATION DIVISION
Santa Fe, New Mexico

Case Nos. 12112 and 12113 Exhibit No. 5

Submitted by: GP II Energy, Inc.

Hearing Date: February 4, 1999

LAW OFFICES

LOSEE, CARSON, HAAS & CARROLL, P. A.

311 WEST QUAY AVENUE

P. O. BOX 1720

ARTESIA, NEW MEXICO 88211-1720

TELEPHONE

(505) 746-3505

FACSIMILE

(505) 746-0310

MARY LYNN BOGLE
 ERNEST L. CARROLL
 JOEL M. CARSON
 DEAN S. CROSS
 JAMES E. HAAS

OF COUNSEL
 A.J. LOSEE

FAX TRANSMITTAL DATE: 02/03/99

BROADCAST TRANSMISSION

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Lori Wrotenberg, Dir OF NMOCFAX: (505) 827-8177NAME: William F. Carr OF Campbell, CarrFAX: (505) 988-6042

NAME: _____ OF _____

FAX: _____

NAME: _____ OF _____

FAX: _____

NAME: _____ OF _____

FAX: _____

SENDER: _____

RE: GP II Energy, Inc OGD Apprs.TOTAL NUMBER OF PAGES (INCLUDING THIS SHEET): 3

IF YOU DO NOT RECEIVE ALL THE PAGES INDICATED ABOVE, PLEASE CALL

Randy AS SOON AS POSSIBLE AT (505) 746-3505

MESSAGE: Enclosed please find Entries of Appearance
for filing in the Captioned cases.

NOTE: The information contained in this facsimile message is attorney/client privileged and confidential information intended only for use by the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivery to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is in error. If you have received this facsimile in error, please immediately notify us by collect telephone call and return the original message to us at the above address via the U. S. Postal Service.

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


IN THE MATTER OF THE APPLICATION
OF GP II ENERGY, INC. FOR APPROVAL OF
A WATERFLOOD PROJECT, EDDY COUNTY,
NEW MEXICO

CASE NO. 12112

ENTRY OF APPEARANCE

COMES NOW Ernest L. Carroll, Losee, Carson, Haas & Carroll, P. A., and enters his
appearance in the captioned cause of action on behalf of STAPLES OIL COMPANY. and K. M.
JONES OIL COMPANY.

LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 
Ernest L. Carroll
P.O. Box 1720
Artesia, NM 88211-1720
(505)746-3505

Attorneys for Staples Oil Co. And K. M. Jones Oil Co.

I hereby certify that I caused a true and
correct copy of the foregoing pleading to be
faxed to counsel of record this February 3, 1999.


Ernest L. Carroll

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


IN THE MATTER OF THE APPLICATION
OF GP II ENERGY, INC. FOR STATUTORY
UNITIZATION, EDDY COUNTY, NEW MEXICO

CASE NO. 12113

ENTRY OF APPEARANCE

COMES NOW Ernest L. Carroll, Losee, Carson, Haas & Carroll, P. A., and enters his
appearance in the captioned cause of action on behalf of STAPLES OIL COMPANY. and K. M.
JONES OIL COMPANY.

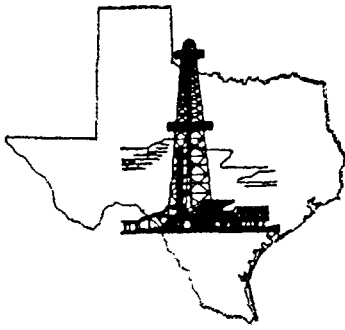
LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 
Ernest L. Carroll
P.O. Box 1720
Artesia, NM 88211-1720
(505)746-3505

Attorneys for Staples Oil Co. And K. M. Jones Oil Co.

I hereby certify that I caused a true and
correct copy of the foregoing pleading to be
faxed to counsel of record this February 3, 1999.

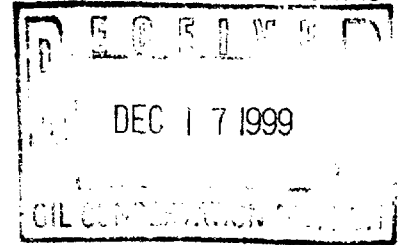

Ernest L. Carroll



GP II ENERGY, INC.

Oil & Gas Exploration & Production

P.O. BOX 50682 • MIDLAND, TEXAS 79710 • PHONE 915-684-4748 • FAX 915-570-4748



December 16, 1999

Commissioner of Public Lands
Mr. Pete Martinez
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

Bureau of Land Management
Mr. Armando Lopez
2909 West 2nd Street
Roswell, New Mexico 88201

NM Oil Conservation Division
Ms. Lori Wrotenbery
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Request for Final Approval
Statutory Unitization
North Square Lake Unit
Eddy County, New Mexico
NMOCD Case No. 12113
NMOCD Order No. R-11207

Ladies and Gentlemen:

GP II Energy, Inc. hereby requests final approval of the statutory unitization of the North Square Lake Unit, located in Eddy County, New Mexico. GP II Energy's request for approval is based on the following facts:

- The agreement will tend to promote the conservation of oil and gas and better utilize reservoir energy;
- Under the proposed unit operation, the State of New Mexico will receive its fair and equitable share of the recoverable oil and gas in place under its lands within the unit area;
- Each beneficiary institution of the State of New Mexico will receive its fair and equitable share of the recoverable oil and gas in place under its lands within the unit area; and
- The unit agreement is in other respects for the best interest of the trust.

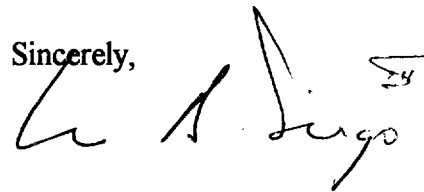
As per your written request of May 7, 1999, and subsequent phone communications, enclosed are the following:

1. One copy of the Unit Agreement with original signed and notarized ratifications representing approval by the unit royalty and working interest owners in excess of the required 75% approval needed for statutory unitization. The Unit Agreement now calls for an effective date of January 1, 2000.
2. One copy of the Unit Operating Agreement to reflect consistency with corrections in the Unit Agreement.
3. A check in the amount of \$300.00 representing the balance of the filing fee.
4. A copy of our Initial Plan of Operation.
5. A redesignation of well names and numbers.
6. Noted corrections to Exhibit B-1 Tract 29A, as well as other corrections identified.

Pursuant to the Statutory Unitization Act, Sections 70-7-1 through 70-7-21, NMSA 1978, GP II Energy, Inc. has met all the requirements in said act, as evidenced by the information contained herein, and therefore respectfully requests final approval for statutory unitization of the North Square Lake Unit, consisting of 6155.96 acres, more or less, and being a portion of the Grayburg Jackson Seven Rivers-Queen-Grayburg-San Andres pool in Eddy County, New Mexico.

Thank all of you for your assistance in this matter. If you have any additional questions, please contact me at 915/685.0878.

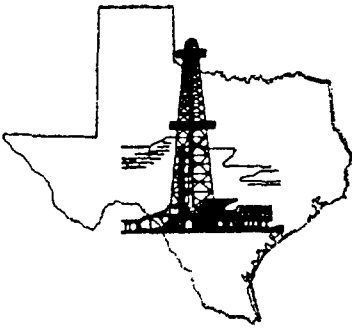
Sincerely,

A handwritten signature in black ink, appearing to read "M. A. Sirgo, III". The signature is stylized with a large, sweeping "M" and a long, trailing "S" that loops around. There is a small mark above the "S" that looks like a checkmark or a stylized "y".

M. A. Sirgo, III

MAS/pr

Enclosures



GP II ENERGY, INC.

Oil & Gas Exploration & Production

P.O. BOX 50682 • MIDLAND, TEXAS 79710 • PHONE 915-684-4748 • FAX 915-570-4748

December 16, 1999

Commissioner of Public Lands
Mr. Pete Martinez
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

Bureau of Land Management
Mr. Armando Lopez
2909 West 2nd Street
Roswell, New Mexico 88201

NM Oil Conservation Division
Ms. Lori Wrotenbery
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Plan of Development
North Square Lake Unit

Ladies and Gentlemen:

The following is GP II Energy's initial plan of operation for the North Square Lake Unit.

INITIAL PLAN OF DEVELOPMENT

The project, to fully develop the North Square Lake Unit for enhanced oil recovery, requires the possible drilling of 100+ new 20-acre infill producing wells to improve the efficiency to be realized by waterflooding on reduced well spacing.

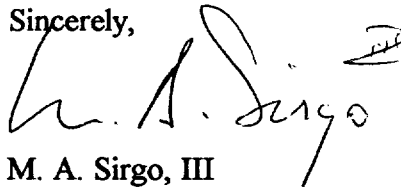
Phase I of the project, to commence immediately, will be the drilling of 10 new 20-acre infill producing wells located strategically throughout the unit, which locations are designed to yield the most representative cross section of reservoir conditions in the unit today. Upon evaluation of the data obtained in these 10 wells, development of the unit will progress on a phase basis.

Initial Plan of Development
December 16, 1999
Page 2

Injection work for each phase will be determined and presented to the Oil Conservation Commission for review and comments prior to any injection work and or new water injection commencing for the newly developed 20-acre infill producers.

If you have any questions, please call me at 915/685.0878.

Sincerely,

A handwritten signature in black ink, appearing to read "M. A. Sirgo, III". The signature is fluid and cursive, with a large initial "M" and a stylized "S".

M. A. Sirgo, III

MAS/pr

NORTH SQUARE LAKE UNIT WELL REDESIGNATION

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
A. N. Etz	2	03922	25A-16-30	810' FNL 510' FEL	P&A	Injector	17
A. N. Etz	3	03923	25G-16-30	2130' FNL 1650' FEL	P&A	Injector	30
A. N. Etz	1	03921	25H-16-30	1980' FNL 510' FEL	P&A	Injector	32
LOE	4	10571	25H-16-30	1650' FNL 990' FEL	Active Prod.	Active Prod.	31
Etz E (Walnut)	4	03927	25I-16-30	1980' FSL 660' FEL	Active Prod.	Injector	52
Etz E (Walnut)	3	03926	25J-16-30	1980' FSL 1980' FEL	Active WIW	Active WIW	51
Etz E (Walnut)	2	03925	25O-16-30	660' FSL 1980' FEL	Active WIW	Active WIW	69
Etz E	1	03924	25P-16-30	660' FSL 660' FEL	InActive Prod.	Injector	71
Etz (Walnut)	6	20316	25P-16-30	1315' FSL 1315' FEL	InActive Prod.	Active Prod.	70

State "H"	3	04031	36A-16-30	810' FNL 600' FEL	Active Prod.	Injector	96
State "H"	4	10863	36A-16-30	10' FNL 10' FEL	Active WIW	Active Prod.	97
State H	2	04030	36B-16-30	660' FNL 1980' FEL	Active Prod.	Injector	95
Continental State	3	04020	36C-16-30	660' FNL 1980' FWL	P&A	Injector	94

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Continental State	4	04021	36D-16-30	660' FNL 660' FWL	P&A	Injector	93
Continental State	2	04019	36E-16-30	1980' FNL 660' FWL	Active Prod.	Injector	117
Continental St.	1	04018	36F-16-30	1980' FNL 1980' FWL	P&A WIW	Injector	118
Desa	1	21747	36G-16-30	1650' FNL 1650' FEL	Active Prod.	Injector	120
State H (Witch)	1		36G-16-30	1980' FNL 1980' FEL	P&A	Injector	119
State J	1	04028	36H-16-30	1330' FNL 1310' FEL	Active Prod.	Active Prod.	121
Tellyer State	1	NA	36H-16-30	1980' FNL 660' FEL	P&A	Injector	122

Etz	3	20127	19I-16-31	1650' FSL 990' FEL	Inactive WIW	Injector	4
Etz	4	20183	19J-16-31	1980' FSL 1980' FEL	Active Prod.	Injector	3
Carper	2	04855	19K-16-31	1980' FSL 1660' FWL	P&A	Injector	2
Carper	1	04854	19L-16-31	1980' FSL 500' FWL	Active Prod.	Injector	1
Etz	1	04852	19M-16-31	660' FSL 504' FWL	P&A	Injector	9
Etz	2	04853	19N-16-31	660' FSL 1668' FWL	Active Prod.	Injector	10
Vickers	6	04857	19O-16-31	660' FSL 1980' FEL	Active Prod.	Injector	11
Vickers	5	04856	19P-16-31	660' FSL 660' FEL	InActive Prod.	Injector	12

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
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Grier	14	04864	20I-16-31	1980' FSL 660' FEL	Inactive WTW	Injector	8
Grier	13	04863	20J-16-31	1980' FSL 1980' FEL	Active Prod.	Injector	7
Rowley Federal	1	10206	20K-16-31	1650' FSL 1980' FWL	P&A	Injector	6
Rowley Federal	2	10322	20L-16-31	1650' FSL 990' FNL	Active Prod.	Injector	5
Grier	3	04858	20M-16-31	330' FSL 510' FWL	P&A WTW	Injector	13
Grier	4	10343	20N-16-31	990' FSL 1980' FWL	Active Prod.	Injector	14
Baxter "A"	1	04859	20O-16-31	660' FSL 1980' FEL	P&A	Injector	15
Baxter "A"	2	04860	20P-16-31	660' FSL 660' FEL	P&A	Injector	16

Federal	4	04883	27D-16-31	990' FNL 990' FWL	P&A	Injector	29
Federal	1	04878	27E-16-31	1980' FNL 660' FWL	P&A	Injector	48
Trust	1	04882	27F-16-31	1980' FNL 1650' FWL	P&A	Injector	49
Federal	2	04880	27G-16-31	1980' FNL 1980' FEL	P&A	Injector	50
Federal J-27	1	10530	27J-16-31	1650' FSL 2310' FEL	P&A	Injector	68
Federal Trust K-27	1	10121	27K-16-31	1980' FSL 1980' FWL	Active Prod.	Injector	67

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Valentine	2	10284	27L-16-31	1650' FSL 990' FWL	Active Prod.	Injector	66
Valentine	1	04881	27M-16-31	660' FSL 660' FWL	P&A	Injector	88
Jeffers Federal	1	NA	27N-16-31	660' FSL 1980' FWL	P&A	Injector	90
Jeffers Federal	2	22003	27N-16-31	990' FSL 1650' FWL	InActive Prod.	Active Prod.	89
Riley 27	1	10270	27O-16-31	990' FSL 2310' FEL	Active Prod.	Injector	91
Featherstone	1	04887	27P-16-31	330' FSL 330' FEL	Active Prod.	Injector	92

Kennedy	4	04889	28A-16-31	660' FNL 660' FEL	P&A	Injector	28
Kennedy	3	10549	28C-16-31	660' FNL 1650' FWL	P&A	Injector	27
Johnson B	4	04897	28D-16-31	660' FNL 660' FWL	P&A	Injector	26
Sheldon	3	04896	28E-16-31	1980' FNL 660' FWL	P&A	Injector	44
Kennedy A	2	10321	28F-16-31	1650' FNL 2310' FWL	Active Prod.	Injector	45
Sheldon	4	04899	28G-16-31	1980' FNL 1650' FEL	Active Prod.	Injector	46
Kennedy	1	10149	28H-16-31	1980' FNL 660' FEL	P&A	Injector	47
Sheldon	5 or 2	04900	28I-16-31	2310' FSL 660' FEL	P&A	Injector	65
Kennedy	3	04890	28J-16-31	2310' FSL 1650' FEL	P & A	Injector	64

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Sheldon	1	04894	28K-16-31	1980' FSL 1980' FWL	P&A	Injector	63
Johnson	4	04892	28L-16-31	1980' FSL 660' FWL	P&A	Injector	62
Johnson	2	04891	28M-16-31	660' FSL 660' FWL	P&A	Injector	84
Sheldon	2	NA	28N-16-31	560' FSL 1880' FWL	InActive Prod.	Injector	85
Johnson B	7		28O-16-31	660' FSL 1980' FEL	P&A	Injector	86
Sheldon	3	10078	28P-16-31	330' FSL 626' FEL	P&A	Injector	87

J. N. Fidel "A"	4	04913	29A-16-31	810' FNL 990' FEL	Active Prod.	Injector	25
J. N. Fidel "A"	3	04912	29B-16-31	660' FNL 1980' FEL	Active Prod.	Injector	24
Grier	2	04906	29C-16-31	810' FNL 1980' FWL	P& A WIW	Injector	23
Grier	1	04905	29D-16-31	760' FNL 560' FWL	InActive Prod.	Injector	22
Bruning	1	04911	29E-16-31	1980' FNL 660' FWL	P& A WIW	Injector	40
Bruning	2	04907	29F-16-31	1980' FNL 1980' FWL	Active Prod.	Injector	41
Bruning	3	04908	29G-16-31	1980' FNL 1980' FEL	P& A WIW	Injector	42
Bruning	4	04909	29H-16-31	1980' FNL 660' FEL	Active Prod.	Injector	43
Bruning	5	04903	29I-16-31	1980' FSL 660' FEL	P&A	Injector	61

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Carper "G"	3	04914	29J-16-31	1980' FSL 1880' FEL	Active Prod.	Injector	60
Texas Trading "A"	4	04919	29K-16-31	1880' FSL 1980' FWL	Active WIW	Injector	59
Texas Trading "A"	3	04918	29L-16-31	1980' FSL 660' FWL	Active Prod.	Injector	58
Texas Trading A	1	04916	29M-16-31	660' FSL 660' FWL	P&A	Injector	80
Texas Trading "A"	2	04917	29N-16-31	660 FSL 1980' FWL	InActive Prod.	Injector	81
Bruning	6	04910	29O-16-31	660' FSL 1980' FEL	P&A	Injector	82
Carper "G"	4	04915	29P-16-31	550 FSL 550' FEL	InActive Prod.	Injector	83

Vickers	2	04934	30A-16-31	660' FNL 660' FEL	P&A WIW	Injector	21
Vickers	4	04936	30B-16-31	660' FNL 1980' FEL	InActive Prod.	Injector	20
LOE	3	10469	30C-16-31	330' FNL 1995' FWL	P&A	Injector	19
George Etz	1	04923	30D-16-31	810' FNL 503' FWL	P&A	Injector	18
LOE	5	NA	30E-16-31	2630' FNL 10' FWL	P&A	Active Prod.	53
LOE	10	20701	30E-16-31	1790' FNL 330' FWL	Active Prod.	Active Prod.	33
George Etz (Woodward)	1	04904	30E-16-31	1980' FNL 503' FWL	P&A	Injector	34
George Etz (Woodward)	2	NA	30F-16-31	1980' FNL 1670' FWL	P&A	Injector	36

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
LOE	2	10416	30F-16-31	1980' FNL 1346' FWL	Active Prod.	Active Prod.	35
Vickers	W7	04937	30G-16-31	1345' FNL 1345' FEL	T&A	Active Prod.	38
Vickers	3	04935	30G-16-31	1980' FNL 1980' FEL	P&A	Injector	37
Vickers	1	04933	30H-16-31	1980' FNL 660' FEL	Active Prod.	Injector	39
Fidel	2	04925	30I-16-31	1980' FSL 660' FEL	P&A	Injector	57
Grier	12	04929	30J-16-31	1980' FSL 1980' FEL	Active Prod.	Injector	56
LOE	1	10415	30K-16-31	1650' FSL 1346' FWL	Active Prod.	Active Prod.	74
Grier	2	NA	30K-16-31	1980' FSL 1980' FWL	P&A	Injector	55
Grier	2	04930	30L-16-31	1980' FSL 506' FWL	P&A	Injector	54
LOE	9	20554	30M-16-31	990' FSL 330' FWL	Active Prod.	Active Prod.	72
Grier	1	04926	30M-16-31	660' FSL 660' FWL	P&A	Injector	73
Grier	1	04931	30N-16-31	660' FSL 1980' FWL	P&A	Injector	76
LOE	11	20839	30N-16-31	660' FSL 1346' FWL	Active Prod.	Active Prod.	75
Grier	19	24458	30O-16-31	990' FSL 1650' FWL	Active Prod.	Active Prod.	78
Grier	10	04927	30O-16-31	660' FSL 1980' FEL	P&A	Injector	77

LEASE NAME	WELL #	API #	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
J. N. Fidel	1	30-015 04928	30P-16-31	660' FSL 660' FEL	InActive Prod.	Injector	79

Grier	9	04940	31A-16-31	660' FNL 660' FEL	P&A	Injector	103
Grier	17	20185	31A-16-31	330' FNL 660' FEL	Active WIW	Injector	102
Grier	11	04946	31B-16-31	660' FNL 1980' FEL	Active Prod.	Injector	101
Grier	15	10752	31B-16-31	10' FNL 2630' FEL	Active WIW	Active Prod.	100
Grier	3	04944	31C-16-31	660' FNL 1980' FWL	Active Prod.	Injector	99
Grier	20	24580	31C-16-31	1250' FNL 1031' FWL	Active Prod.	Active Prod.	124
Grier	1	04942	31D-16-31	660' FNL 660' FWL	Active Prod.	Injector	97
Grier	2	04943	31E-16-31	1980' FNL 660' FWL	Active Prod.	Injector	123
Grier	16	20184	31E-16-31	2630' FNL 10' FWL	Active WIW	Injector	142
Grier	4X	04945	31F-16-31	1980' FNL 1950' FWL	Active Prod.	Injector	125
Grier	5	04947	31G-16-31	1980' FNL 1980' FEL	P&A	Injector	126
Grier	7X	04949	31H-16-31	1980' FNL 660' FEL	Inactive WIW	Injector	127
Grier	6	04948	31J-16-31	1980' FSL 1980' FEL	Active WIW	Injector	145
Grier "A"	1	04941	31K-16-31	1980' FSL 1680' FWL	Active Prod.	Injector	144

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Grier "B"	2	24706	31L-16-31	1370' FSL 977' FWL	Active Prod.	Active Prod.	159
Grier A	1	04938	31L-16-31	1980' FSL 511' FWL	P&A	Injector	143
H. J. LOE	5	24920	31M-16-31	660' FSL 330' FWL	Active Prod.	Active Prod.	158
H. J. Loe	1	4953	31N-16-31	330' FSL 1357' FWL	Active Prod.	Active Prod.	160
Grier	18	24457	31O-16-31	660' FSL 1980' FEL	Active Prod.	Injector	162
Grier	4	4951	31N-16-31	660' FSL 1980' FWL	P&A	Injector	161

State C	2	04961	32 A-16-31	660 FNL 660' FEL	P&A	Injector	108
State C	1	04960	32B -16-31	660 FNL 1980' FEL	P&A	Injector	107
Zephyr ZQ	1	25029	32B-16-31	330' FNL 2310' FEL	Active Prod.	Active Prod.	106
State R	3	04966	32C -16-31	660' FNL 1980' FWL	P&A	Injector	105
State R	1	04964	32D -16-31	660' FNL 660' FWL	P&A	Injector	104
State R	2	04965	32 E-16-31	1650' FNL 990' FWL	P&A	Injector	128
State R	4	04967	32F-16-31	1980' FNL 1980' FWL	P&A	Injector	129
State C	4	04963	32G -16-31	1980' FNL 1980' FEL	P&A	Injector	130
State C	3	04962	32H -16-31	1980' FNL 660' FEL	P&A	Injector	131

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Tidewater State	1	04956	32I-16-31	1980' FSL 660' FEL	Active Prod.	Injector	148
Western Dev. "A" State	2	04959	32J-16-31	1980' FSL 1980' FEL	Active Prod.	Injector	147
Doolin	2	04954	32L -16-31	1980' FSL 660' FWL	P&A	Injector	146
Doolin	1	04955	32 N-16-31	660' FSL 1980' FWL	P&A	Injector	163
Tidewater State	2	04957	32O-16-31	660' FSL 1980' FEL	Active Prod.	Injector	164
Western Dev. "A" State	1	04958	32P-16-31	660' FSL 660' FEL	Active Prod.	Active Prod.	165

Johnson	6	04972	33A-16-31	660' FNL 660' FEL	P & A	Injector	112
Texas Trading	3	04979	33B-16-31	660' FNL 1980' FEL	Active Prod.	Injector	111
Texas Trading	8	04984	33B-16-31	1270' FNL 1650' FEL	Active Prod.	Active Prod.	135
Johnson A	1	04976	33C-16-31	660' FNL 1980' FWL	P&A	Injector	110
Texas Trading	1	04977	33D-16-31	660' FNL 660' FWL	InActive Prod.	Injector	109
Texas Trading	2	04978	33E-16-31	1880' FNL 660' FWL	T&A	Injector	132
Johnson "A"	3	04975	33F-16-31	1980' FNL 1980' FWL	Active Prod.	Injector	133
Texas Trading	4	04980	33G-16-31	1980' FNL 1980' FEL	P&A	Injector	134
Johnson	13	04970	33H-16-31	1370' FNL 990' FEL	InActive Prod.		136

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Johnson	5	04971	33H-16-31	1980' FNL 660' FEL	P&A	Injector	137
Texas Trading	6	04982	33I-16-31	1980' FSL 660' FEL	P&A	Injector	152
Johnson	15	04973	33J-16-31	2310' FSL 1650' FEL	P&A	Injector	151
Texas Trading	5-B	04981	33K-16-31	1980' FSL 1980' FWL	P&A	Injector	150
Kennedy	5	04969	33L-16-31	1980' FSL 660' FWL	Active Prod.	Injector	149
Kennedy	4	04968	33M-16-31	660' FSL 660' FWL	Active Prod.	Injector	166
Texas Trading	7	04983	33N-16-31	810' FSL 1980' FWL	InActive Prod.	Injector	167
Johnson	16	04974	33O-16-31	330' FSL 2310' FEL	Active Prod.	Active Prod.	168
Johnson	14	NA	33O-16-31	510' FSL 2310' FEL	P & A WTW	Injector	169
Texas Trading	9	10345	33P-16-31	660' FSL 660' FEL	Active Prod.	Injector	170

Kennedy Federal	2	10272	34A-16-31	990' FNL 330' FEL	Active Prod.	Injector	116
Kennedy A	1	10273	34B-16-31	660' FNL 1980' FEL	Active Prod.	Injector	115
Kennedy	1	10271	34C-16-31	660' FNL 1980' FWL	Active Prod.	Injector	114
Carper "AB"	4	04990	34D-16-31	660' FNL 660' FWL	Active Prod.	Injector	113
Carper AB	3B	04989	34E -16-31	1980' FNL 660' FWL	P&A	Injector	138

LEASE NAME	WELL #	API # 30-015	S-T-R	LOC'N.	CURRENT STATUS	PROPOSED STATUS	PROPOSED WELL #
Kennedy	6	04986	34F-16-31	2310' FNL 1650' FWL	Active Prod.	Active Prod.	154
Johnson	9	04994	34F -16-31	1980' FNL 1980' FWL	P&A	Injector	139
Johnson	17	04998	34G -16-31	2310' FNL 1980' FEL	P&A	Injector	140
Kennedy	1	04985	34H-16-31	1980' FNL 660' FEL	Active Prod.	Injector	141
Carper AB	1	04987	34I -16-31	1980' FSL 660' FEL	P&A	Injector	157
Johnson	18	21771	34J-16-31	1980' FNL 2080' FEL	Active Prod.	Injector	156
Carper	5	04991	34K -16-31	1980' FSL 1980' FWL	P & A WIW	Injector	155
Johnson	8	04993	34L-16-31	1980' FSL 660' FWL	Active Prod.	Injector	153
Johnson	10	04995	34M-16-31	660' FSL 660' FWL	Active Prod.	Injector	171
Carper Federal	6	04992	34N-16-31	660' FSL 1980' FWL	Active Prod.	Injector	172
Johnson	12	04997	34O -16-31	990' FSL 1980' FEL	P&A	Injector	173
Carper "AB"	2	04988	34P-16-31	660' FSL 660' FEL	Active Prod.	Injector	174