

TURLEY OIL COMPANY
117 NORTH BROADWAY
OKLAHOMA CITY, OKLAHOMA

1100 OFFICE OCC
APR 16 1964 10 11 51

TELEPHONE CENTRAL 5-0005

April 16, 1964

Mr. J. E. Kapteina
Oil and Gas Inspector
Oil Conservation Commission
Sante Fe, New Mexico

Re: O'Connor State Wells No. 1-16
and 1A-16, Unit P, Section 16,
Township 14 North, Range 32
East, NMPM, Harding County,
New Mexico

Dear Mr. Kapteina:

We regret the confusion and untimely filing of notices that occurred with regard to the captioned well. We had every intention of following proper procedures before the operation commenced and called you, if you recall, about December 22nd to obtain the necessary forms. Unfortunately these forms did not arrive until early January and the operation had to commence in 1963. Incidentally, they were posted in time to arrive before our commencement date but apparently got delayed in the Christmas rush. Once we had started without proper notice, it seemed appropriate to wait the 3 or 4 days it would take to evaluate the well and then contact you about the proper procedure. As you can tell from the records, the 3 or 4 days became weeks and many additional thousands of dollars.

The cause of the failure to comply with the regulations is not important now but rather what are the effects. We made every effort and had only cost trouble in conducting these operations in a prudent and workmanlike manner. Both the old hole and the new one are thoroughly plugged in a manner not planned but very effective. The lost drill pipe is securely planted in the old hole and the top cement plug effectively seals the long surface string. Extra-heavy casing was thoroughly cemented top and bottom in the new hole and a cement plug placed inside the casing near the top. There is no doubt in our minds that the wells are effectively plugged against any future unforeseen difficulty.

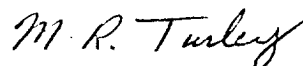
Bruhn and Sons, Logan, New Mexico, the only bulldozer operator in the area, were asked to supply a turnkey bid for cleaning up the location and filling the pit. The undersigned has been tardy in writing another request for this job and has done so today.

We shall do anything we can to convince you that these wells are prudently plugged, short of re-entering them. We are sure you can appreciate our reluctance in spending the large amount of money necessary to do anything in the area (the nearest oilfield services are 175 miles away). Please remember that if we were not interested in conducting a prudent operation and keeping accurate records, we would not have filed any forms. These wells were so shallow that they could have been classified water wells and let it go at that.

Once again, we are sorry that this situation has developed and regret the inconvenience caused you and your staff.

Very truly yours,

TURLEY OIL COMPANY



M. R. Turley

MRT/bj

cc: Mr. W. J. O'Connor
5131 Classen Blvd.
Oklahoma City, Oklahoma

Mr. Donald G. Haden
P. O. Box 271
Midland, Texas