

February 16, 2007

New Mexico Oil Conservation Division 1301 W. Grand Ave. Artesia. New Mexico 87504

Attention: Mr. Tim Gumm



Re: Unorthodox Location

Administrative Approval Request

Burch Keely Unit #988 250' FNL & 2130' FWL Section 19 T-17S R-30E Eddy County, New Mexico

30-015-35441

Dear Mr. Gumm:

/wm

Attachments

Marbob Energy Corporation respectfully requests administrative approval for an unorthodox location of the Burch Keely Unit #988 well as referenced above. Attached is an OCD Form C-102 showing the proposed oil well spacing unit along with a map showing the adjoining spacing units. The well is unorthodox to the north boundary of the NE/4NW/4. The affected spacing unit is included in the Burch Keely Federal Unit which covers all of Section 18& 19. Notice has been provided to the operator and working interest owners of that unit.

This location will also increase our secondary/tertiary flood pattern options and give us more flexibility to modify or change flood patterns in the future to maximize oil recovery from this unit. The surface problem encountered was cultural but the fifty foot move was perceived as a reasonable compromise and this was the only acceptable location to the archeologist.

Thank you for your consideration of this. If you need to talk with me further please call me at 1-800-748-1550.

Sincerely,

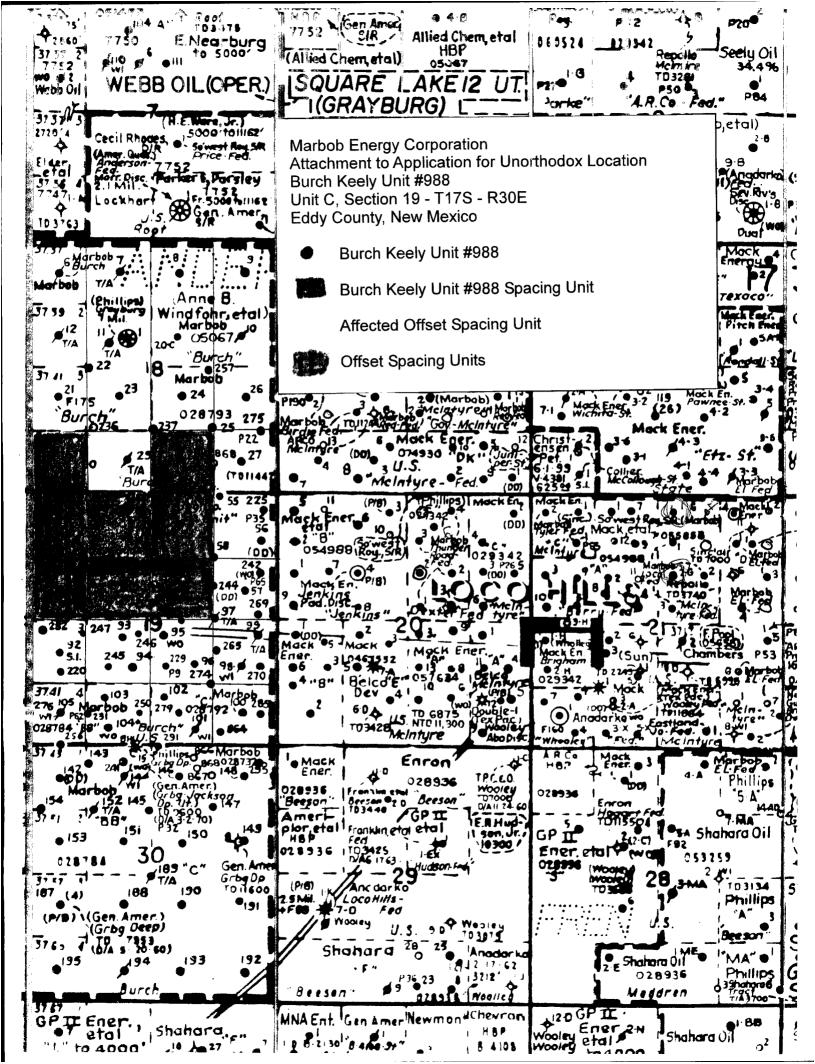
William Miller

Land Department

Min Miller

BRYAN G. ARRANT DISTRICT II GEOLOGIST

MAR 0 5 2007



DISTRICT I 1625 N. FRENCH DR., HOBBS, NM 86240

State of New Mexico Rnergy, Minerals and Natural Resources Department

SERVATION DIVISION Submit South ST. FRANCIS DR. Fe, New Mexico 8750 OIL and

Form C-102 Revised October 12, 2005 Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

DISTRICT II 1301 W. GRAND AVENUE, ARTESIA, NW 86210

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

DISTRICT IV

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

API Number	Pool Code	Pool Nai	Pool Name GRBG JACKSON SR Q GRBG SA		
	28509	GRBG JACKSON			
Property Code	Property		Well Number		
OGRID No.	BURCH KE		988 Elevation		
14049	MARBOB ENERGY		3629		

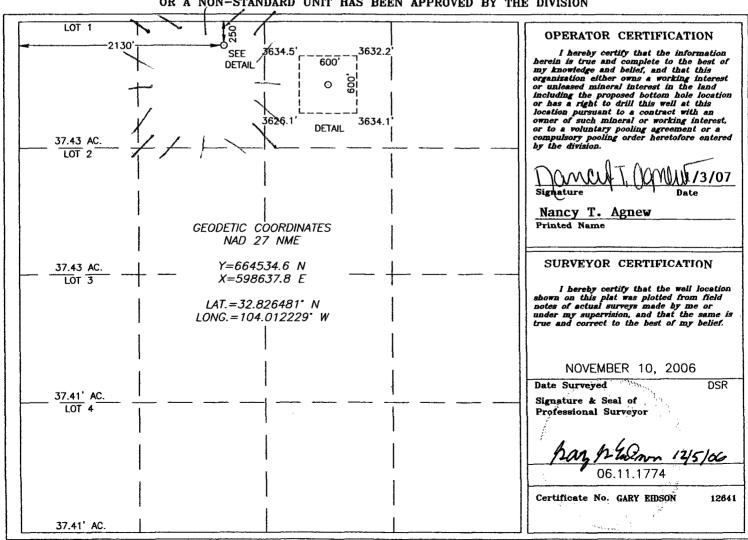
Surface Location

1	UL or lot No.	Section	Township	Range	Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
	С	19	17-S	30-E		250	NORTH	2130	WEST	EDDY

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint o	r Infill Co	nsolidation (Code Or	der No.	1		<u> </u>	
40	1								

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





February 16, 2007



Marbob Energy Corp.. P.O. Box 227 Artesia, NM 88221-0227

Request

RE: Unorthodox Surface Location Administrative Approval

> Burch Keely #988 250' FNL & 2130' FWL Section 19, T-17S R-30E Eddy County, New Mexico

Gentlemen:

This letter will serve as notice of our application for the above described unorthodox location. A copy of the complete application is enclosed for your review. If you object to this application please advise OCD Santa Fe in a timely manner. If you do not object no action is required on your part. If you have any questions regarding this please contact me.

Sincerely,

William Miller Land Department

Willia Miller

/wm Enclosures