



PARTNERS
CARLTON BEAL, JR.
BARRY BEAL
SPENCER BEAL
KELLY BEAL
BARRY BEAL, JR.
STUART BEAL
ROBERT DAVENPORT, JR.

BTA OIL PRODUCERS

104 SOUTH PECOS
MIDLAND, TEXAS 79701

432-682-3753
FAX 432-683-0311

GULF COAST DISTRICT
FOUR GREENSPRING PLAZA
16945 NORTHCHASE DRIVE, STE. 1600
HOUSTON, TEXAS 77060
PH. 281-872-5022 FAX 281-872-5054

ROCKY MOUNTAIN DISTRICT
600 17TH STREET, STE. 2230 SOUTH
DENVER, CO 80202
PH. 303-534-4404 FAX 303-534-4661

February 20, 2007

Re: Owl, 20504 JV-P, No. 5
Section 18, T26S-R27E
Eddy County, NM

30 - 015 - 35435

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
DISTRICT I
1625 N. French Drive
Hobbs, NM 88240

Attn: Mr. Bryan Arrant

Gentlemen:

In regards to the New Mexico Oil Conservation Division's request for an H2S Contingency Plan for the proposed 20504 JV-P Owl #5 well, BTA Oil Producers requests relief from submitting this plan.

During completion and testing activities for our 20504 JV-P Owl #1 (UL K, Sec. 18, T26S-R27E), carried out in the summer 2006, no H2S was encountered. BTA currently operates 37 Delaware wells in New Mexico and Texas and has never encountered H2S in the Delaware. Given our experience with the Delaware, we feel an H2S contingency plan is unwarranted.

Respectfully,

Britton McQuien
For BTA Oil Producers