

Ocean Munds-Dry omundsdry@hollandhart.com

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May 31, 2007

HAND-DELIVERED

Mark E. Fesmire, P. E.
Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe. New Mexico 87505

Re: Application of EOG Resources, Inc. for Administrative Approval of the Simultaneous Dedication of the south 320 acres of Irregular Section 2, Township 16 South, Range 24 East, N.M.P.M., Eddy County, New Mexico to its proposed Gila C 2 Fed Com Well No. 2H and the existing Gila C 2 Fee Com Well No. 1H.

Dear Mr. Fesmire:

EOG Resources, Inc. is the operator of a standard 320-acre spacing unit in the West Cottonwood Creek-Wolfcamp Gas Pool (Pool Code 75260) comprised of the south 320 acres of Irregular Section 2, Township 16 South, Range 24 East, N.M.P.M., Eddy County, New Mexico. This spacing unit is dedicated to EOG's Gila C 2 Fee Com No. 1H which has been horizontally drilled and produces from the Wolfcamp formation.

EOG seeks administrative approval of the simultaneous dedication of this standard 320-acre gas spacing unit to the following two horizontal gas wells:

- A. the existing GILA C 2 FEE COM Well No. 1H (API No. 30-015-35567) horizontally drilled from a surface location 2,392 feet from the South line and 288 feet from the East line to an end point or bottom hole location 1,880 feet from the South line and 660 feet from the West line of said Section 2; and
- B. the proposed GILA C 2 FED COM Well No. 2H (API No. 30-015 -35185) to be horizontally drilled from a surface location 504 feet from the South line and 196 feet from the East line to a proposed end point or bottomhole location 760 feet from the South line and 660 feet from the West line of said Section 2.

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Both the penetration point and the bottomhole location for the Gila C 2 Fee Com Well No. 1H are at a standard location in the Wolfcamp formation pursuant to Division Rules 104.C (2) (a) and 111.A (7). EOG now intends to horizontally drill and complete its proposed Gila C 2 Fed Com Well No. 2H to be drilled to the targeted subsurface endpoint or bottomhole location 760 feet from the South line and 660 feet from the West line (Unit M) of Section 2. EOG proposes to drill this well in compliance with the setback requirements of Division Rules 104.C(2)(b) and 111.A(7) for deep gas wells in southeast New Mexico.

Attached hereto as **Exhibit A** is a copy of Division Form C-102 for this well that shows the proposed surface and bottomhole location of the well.

As shown on **Exhibit B** EOG is the only offset operator around the spacing unit in Section 2. In addition, working interest ownership is common in the offsetting spacing units. Therefore, there are no affected parties as defined by Division rules.

The simultaneous dedication of the south 320 acres of said Section 2 to the Gila C 2 Fee/Fed Com Well Nos. 1H and 2H will afford EOG the opportunity to efficiently produce the Wolfcamp formation under this spacing unit. EOG's proposed simultaneous dedication of these wells does not exceed the number of wells allowed by Division Rule for this spacing unit.

Your attention to this application is appreciated.

Sincerely,

Ocean Munds-Dry

Attorney for EOG Resources, Inc.

Enclosures

cc:

Donny Glanton, EOG

OCD - Artesia

District 1

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM 87410

District IV

320

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico

Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION

1220 South St. Francis Dr.

Santa Fe, NM 87505

Form C-102

Revised October 12, 2005

Submit to Appropriate District Office

State Lease-4 Copies

Fee Lease-3 Copies

☐ AMENDED REPORT

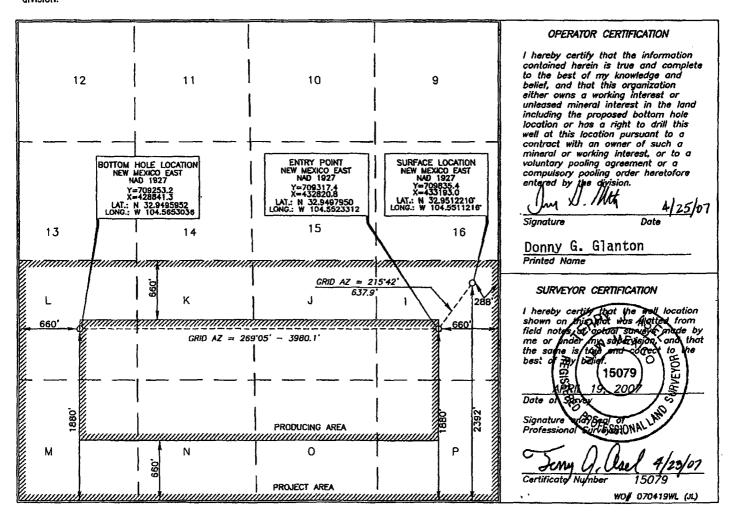
WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name	
30-015-35567	75260	COTTONWOOD CREEK: WC, WEST (GAS	(a)
Property Code	Prope	rty Name	Well Number
36469	GILA "C" 2	? FEE COM	1H
OGRID No.	Operat	tor Name	Elevation
7377	EOG RESOU	URCES, INC.	3558'

Surface Location

UL or lot no.	Section	Township	Range	Lot Idin	Feet from the	North/South line	Feet from the	East/West line	County
I	2	16 SOUTH	24 EAST, N.M.P.M.		2392'	SOUTH	288'	EAST	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
L	2	16 SOUTH	24 EAST, N.M.P.M.		1880'	SOUTH	660'	WEST	EDDY
Dedicated	Acres	Joint or Infill	Consolidation Code Order No.						· · · · · · · · · · · · · · · · · · ·

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the



1-06-06 9/05/06

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WELL LOCATION AND ACREAGE DEDICATION PLAT

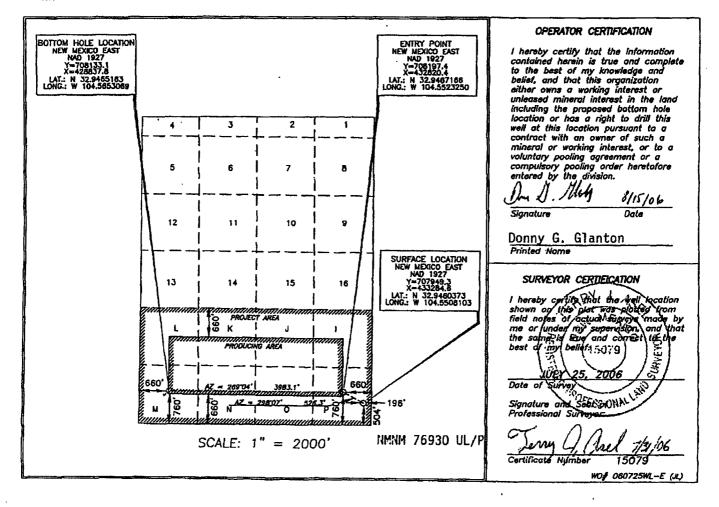
API Number 30 - 015 - 35 18 5	Pool Code 75260	COTTONWOOD CREEK; WC, WEST (GAS)
Property Code		rty Name 2 FED COM	Well Number 2H
OGRID No.	• • • • • • • • • • • • • • • • • • • •	tor Name	Elevation
7377	EOG RESOL	URCES, INC.	3557'

Surface Location

UL or lot no.	Section	Township	Range	Lot kin	Feet from the	North/South line	Feet from the	East/West line	County
P	2	16 SOUTH	24 EAST, N.M.P.M.		504	SOUTH	196	EAST	EDDY
			Dollars Hala Lane	1,	IE D'CC	L C C	ć	·····)

			Bottom	TOIR LOCK	luon	ii Uilleren	r From 201	Tace		
UL or lot no.	Section	Township	Range		Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
М	2	16 SOUTH	24 EAST, N.	M.P.M.	ĺ	760	SOUTH	660	WEST	EDDY
Dedicated	Acres	Joint or Infill	Consolidation Code	Order No.			·			
320										

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.



offsets in Section 2

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	M	N	0	1	
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