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March 31, 2014

State of New Mexico
Oil Conservation Division
Attn: Mr. McMillan
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

**SUBJECT: ADDITIONAL INFORMATION NECESSARY TO APPROVE UNORTHODOX LOCATION FOR RUBY
FEDERAL #37**

Dear Sir,

ConocoPhillips Company has respectfully requested a non-standard location exception for the Ruby Federal #37 well. The lease is recorded as NM LC 029405B. The well is located on the Ruby Lease (NMLC 029405B) UL B, 550' from the north line and 1690' from the east line of Section 17, Township 17S, Range 32E, Lea County, New Mexico. The bottom hole is located in UL B, 997' from the north line and 1658' from the east line.

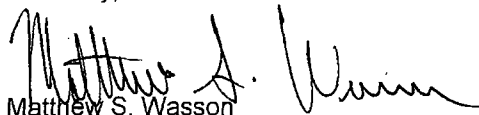
This letter serves to provide additional information the Engineering Bureau requires to approve our exception request. Our perforation interval is 5528'-6602' MD. This interval is entirely within UL B. The producing interval top is 873' FNL and 1660' FEL of Section 17, Township 17S, and Range 32E.

The granting of this exception will prevent waste and minimize surface disturbance.

This location was found to be the only one suitable for this well, that would allow us to reach our targeted production zone, avoid the hazard of the caliche pit, while still protecting sand dune habitat deemed critical by the Bureau of Land Management biologist.

If you have questions regarding this request, I can be reached at the telephone number above or via email at Matt.S.Wasson@conocophillips.com.

Sincerely,


Matthew S. Wasson
Staff Geologist
ConocoPhillips Company

USL-7056

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