Since this unorthodox location would allow us to use the existing wellbore to capture potential reserves from the San Andres formation and does not adversely impact any other lease or owner, we would request approval of this unorthodox location. If you have any questions concerning this matter, please contact me.

Sincerely,

Rhonda Nelson Production Department

/**rn**

crrr

Enclosure

Cc: OCD, District I P. O. Box 1980 Hobbs, NM 88240