

## MURPHY OPERATING CORPORATION

UNITED BANK PLAZA, SUITE 300 400 NORTH PENNSYLVANIA AVENUE POST OFFICE BOX 2648 ROSWELL, NEW MEXICO 88202-2648

TELEPHONE 505 623-7210

December 23, 1986

Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Attention: R.K. Stamets, Director

Re: Phillips Petroleum Company
Request for Administrative Approval
Correspondence dated 11/26/86
State 1-2
Lease No. L-G888
Well No. 1
East Lusk - Bone Spring Field
Lea County, New Mexico

## Gentlemen:

This letter is in response to Phillips Petroleum Company's request for administrative approval for exception to Rule No. 2 of the East Lusk - Bone Spring Field Rules, thus allowing a non-standard proration unit of 120-acres as opposed to the normal spacing of 160-acres.

On behalf of Sol West III (and other lease interest holders), we hereby protest and oppose this exception.

East Lusk Bone Spring production is from dolomite reservoirs, whereas in the proposed Phillips' workover well, the reservoir objective is a low permeability sandstone. Both first and second, Bone Spring Sandstone wells typically produce on 40-acre proration units in Lea County fields, such as the Young, EK, Querecho Plains (due north of Phillips' well) and the West Tonto Bone Spring (approximatey one mile southeast of Phillips' well) fields. The 40-acre spacing patterns for these low permeability sandstone wells presumably allow for increased drainage efficiency.

If you find it agreeable, we would prefer to designate 40-acre proration units for the wells producing from the Bone Spring Sandstone on the above captioned well and surrounding acreage.

Sincerely,

Mark B. Murphy

President

on behalf of Sol West, III

MURPHY OPERATING CORPORATION

LOS SIETE EXPLORATION, INC.

George L. Scott m

Vice President

GLS/MBM:dk

cc: Sol West III
P. 0. Box 10120
El Paso, Texas 79992

Chevron USA, Inc. P. O. Box 670 Hobbs, New Mexico 88240

Shell 0il Co. Box 2463 Houston, Texas 77001

Sun Exploration & Prod. Co. Box 2880 Dallas, Texas 75221

P. 0. Box 12507
Ft. Worth, Texas 76116

J. M. Huber 2000 West Loop South Houston, Texas 77027

Tenneco 0il Co. Box 2511 Houston, Texas 77001

Petroleum Development Corp. 9720-B Candelaria Rd., N.E. Albuquerque, New Mexico 87112

Superior Oil Company Box 1521 Houston, Texas 77251

Oil Conservation Division P. O. Box 1980 Hobbs, New Mexico 88240 Phillips Petroleum Company
4001 Penbrook
Odessa, Texas 79762
Attention: Larry M. Sanders
Regulation & Proration Supervisor