

Shell Western E&P Inc.

A Subsidiary of Shell Oil Company



P.O. Box 576

Houston, TX 77001

February 26, 1988

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87505-2088

Gentlemen:

SUBJECT: REQUEST FOR ADMINISTRATIVE APPROVAL
UNORTHODOX LOCATION
NORTH HOBBS (GB/SA) UNIT
SECTION 32, WELL NO. 313
LEA COUNTY, NEW MEXICO

Shell Western respectfully requests administrative approval to drill the subject well at the following unorthodox location:

500' FNL and 2370' FEL of Section 32, T18S-R38E.

The proposed well will be completed as a producer and is necessary to complete an efficient production and injection pattern. Finding No. 14 of Special Order R-6199 provides for the following: "That the Director of the Oil Conservation Division should have authority to approve, without notice and hearing, the drilling of wells at unorthodox locations anywhere within the boundary of the North Hobbs Grayburg-San Andres Unit Area, provided however, no unorthodox location shall be closer than ten feet to any quarter-quarter section line, and provided further, that no such unorthodox location shall be closer than 330 feet to the boundary of the unit area, unless such well is covered by a lease-line agreement with the operator of the lands offsetting such well, and a copy of the lease-line agreement accompanies the application for such unorthodox location, or unless such offset operator has waived objection to the proposed unorthodox location in writing, and his waiver accompanies the application."

Inasmuch as the proposed well is an interior Unit location and is unorthodox only with respect to the 330 feet minimum distance from $\frac{1}{4}$ $\frac{1}{4}$ section line, we request that no waiting period be imposed on approval of the attached "Application to Drill".

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HOBBS OFFICE**