August 19, 1996

Shell Western E & P Inc. P. O. Box 576 Houston, Texas 77001

Attention: Yvonne T. Iverson

Re: Application for administrative approval to deepen the State "A" Well No. 10 (API No. 30-025-32844), located at a previously approved unorthodox oil well location for the Undesignated Vacuum-Upper Pennsylvanian Pool, Vacuum-Wolfcamp Pool, and North Vacuum-Abo Pool (see Division Administrative Order NSL-3516, dated April 6, 1995) 940 feet from the North and East lines (Unit A) of Section 31, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico, in order to test the Morrow formation for gas production.

Dear Ms. Iverson:

I am unable to process your application dated August 8, 1996, Division General Rule 104.F(2) provides that, "The Division Director shall have authority to grant an exception to the well location requirements of Sections 104.B and 104.C above or to the well location requirements of special pool rules without notice and hearing when the necessity for such unorthodox location is based upon geologic conditions, archaeological conditions, topographical conditions, or <u>the</u> <u>recompletion of a well previously drilled to a deeper horizon</u> provided said well was drilled at an orthodox or approved unorthodox location for such original horizon". In anticipation that this request will not be opposed I will set this matter on the next available examiner's hearing docket and cause it to be advertised in the following manner:

> Application of Shell Western E & P Inc. for an unorthodox gas well location, Lea County, New Mexico. Applicant, in the above-styled cause, seeks approval to deepen its State "A" Well No. 10 (API No. 30-025-32844), located at a previously approved unorthodox oil well location for the Undesignated Vacuum-Upper PennsylvanIan Pool, Vacuum-Wolfcamp Pool, and North Vacuum-Abo Pool (see Division Administrative Order NSL-3516, dated April 6, 1995) 940 feet from the North and East lines (Unit A) of Section 31, Township 17 South, Range 35 East, in order to test the Morrow formation for gas production at an unorthodox gas well location within a standard 320-acre gas spacing and proration unit to comprise the E/2 of said Section 31. Said unit is located approximately one mile southeast of Buckeye, New Mexico. IN THE ABSENCE OF OBJECTION, THIS MATTER WILL BE TAKEN UNDER ADVISEMENT.

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Shell Western E & P Inc. will of course be expected to provide adequate notice of this matter pursuant to Division General Rule 1207.

Should you have any questions or comments concerning this matter, please contact me in Santa Fe at (505) 827-8185. Thank you.

Sincerely

Michael E. Stogner Chief Hearing Officer/Engineer

cc: Oil Conservation Division - Hobbs New Mexico State Land Office - Santa Fe William F. Carr - Santa Fe W. Thomas Kellahin - Santa Fe James Bruce - Santa Fe

