3. Applicant proposes the unorthodox well location in order to avoid drilling on an existing potash lease which, in addition to other lands, covers the W/2 SE/4 of Section 30, and the N/2 NE/4 of Section 31.

WHEREFORE applicant requests that this application be set for hearing before the Commission's duly appointed examiner, and that after notice and hearing as required by law the Commission enter its order approving the non-standard unit and unorthodox well location as prayed for.

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Respectfully submitted: BELCO PETROLEUM CORPORATION

By KELLAHIN & FOX P. O. Box 1769 Santa Fe, New Mexico 87501 ATTORNEYS FOR APPLICANT