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February 8, 1979

Mr. Joe D. Ramey  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

RE: J. R. Phillips "B" No. 6 - Infill Location  
Recompletion from Eunice Monument to  
Eumont Gas Pool  
990' FNL & 1650' FWL  
Section 31, T19S, R37E  
Lea County, New Mexico

The Division has indicated that the subject well will meet the requirements for administrative approval in applying for simultaneous dedication of a previously approved 160 acre Eumont Gas Proration Unit to two wells, the J. R. Phillips "B" Nos. 5 and 6. This unit is currently classified as marginal with all acreage dedicated to the J. R. Phillips "B" No. 5.

The original application, filed by letter on January 25, 1979, requested a hearing to approve an unorthodox location and a non-standard proration unit for the subject well in the Eumont Gas Pool. This well had been drilled and completed as an oil well in the Eunice Monument Oil pool in 1974 at an unorthodox location of 990' FNL and 1650' FWL of Section 31-T19S-R37E in Lea County, New Mexico. We plan to abandon the Eunice Monument zone in the well and recomplete in the Eumont Gas pool.

This letter is to notify offset operators and the New Mexico Oil Conservation Division of our intent to seek administrative approval of the subject application and further request dismissal of Case No. 6447 scheduled for the Docket on Wednesday, February 14, 1979.

The original application contained a well location acreage dedication plat (Form C-102), a map showing