



Mid-Continent Region
Exploration/Production

September 6, 1999

Conoco Inc.
10 Desta Drive, Suite 100W
Midland, TX 79705-4500
(915) 686-5400

Mr. Michael Stogner
New Mexico Oil Conservation Division
2040 Pacheco
Santa Fe, New Mexico 87504

NSP-1807

RE: Application for Non-standard Proration Unit
SEMU Burger #81
API # 30-025-20500
Section 19, T-20-S, R-38-E, P
660' FSL & 660' FEL
Eumont Pro Gas Pool (76480)
Lea County, NM

Dear Mr. Stogner,

The above listed well was completed in the Eumont pool January 19, 1998. The C-104 was filed December 28, 1998, as was the 3160-4 completion report. The intent to re-complete was approved December 11, 1997. When the intent was filed the C-102 dedicated 160 acres to this well. No request for a non-standard location was ever submitted. At this time Conoco would like to apply for a non-standard proration Unit order. This well was recompleted in the Eumont pool which has a standard proration unit of 640 acres. Conoco would like to dedicate the SE ¼ 160 acres, putting the well at a standard location of 660' FSL 660' FEL.

The offset operator plat shows that the only operator that could be affected by this non-standard proration unit request is Amerada Hess. Please find attached evidence that they have been notified.

In order to prevent economic waste by allowing access to the Eumont reserves in an existing wellbore, Conoco, Inc. respectfully requests that the application for a non-standard proration unit be granted. Conoco would also like to apologize for not submitting this application before the work was completed. If there are any further questions concerning this application please call me at (915) 686-5798.

Sincerely,

Kay Maddox
Regulatory Agent – Conoco, Inc.

Cc: Oil Conservation Division - Hobbs