



Mid-Continent Region  
Exploration/Production

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

January 27, 1999

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

RE: Application for Non-standard Proration Unit & Location  
SEMU Burger #121  
Section 18, T-20-S, R-38-E, N  
2810' FWL & 660' FSL  
API 30-025-29089  
Eumont Seven Rivers Queen (Pro Gas) 76480  
Lea County, NM

Dear Mr. Stogner,

The SEMU well # 121 is now temporarily abandoned. Conoco, Inc. would like to recomplete this well to test and produce the Eumont Seven Rivers Gas pool. Production from the intended zone is insufficient to allow for a new drill. The location of the wellbore is primarily non-standard with reference to the 40-acre (SW/4 of SE/4) tract directly east, which is operated by Conoco. The ownership on this 40-acre tract is identical to that of the #121. We hesitated to include this tract in our 120-acre proration unit because of crossing the quarter section lines.

The offset operator plat shows the operators that could be affected by this non-standard location request. Please find attached a listing of the offset operators and evidence that they have been appropriately notified.

Conoco, Inc. requests that a non-standard location order be granted based on the reasons stated above. If there are any further questions concerning this application please call me at (915) 686-5798.

Sincerely,

Kay Maddox  
Regulatory Agent

CC: Oil Conservation Division - Hobbs