



Mid-Continent Region
Exploration/Production

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

February 5, 1999

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

RE: Application for Non-Standard
Proration Unit
SEMU Burger B # 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,

Conoco would like to amend our recently submitted application on the referenced well. Instead of the requested 120 acres we would like to allocate 160 acres to the Eumont Seven Rivers Queen (Pro Gas) pool. Having read the special pool rules associated with this pool and realizing that the standard proration unit is 640 acres it was concluded that if the 40 acre tracts were contiguous and shared a solid side boundary all 160 acres that Conoco holds in Section 18 could be included in the non-standard proration unit. The well is located 2310' FWL, 1650' FEL, 660' FSL and 660' FNL proration unit boundary lines. Based on the well location requirements, (160 acres – 660-660) this well is a standard location. None of the wells on the 160 acres previously or currently produces from the Eumont Gas pool.

The offset operator plat shows the operators that could be affected by this non-standard proration unit request. Please find attached a listing of the offset operators and evidence that they have been renotified of our amended request.

Conoco, Inc. requests that a non-standard proration unit 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

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