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May 9, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Victor T. Lyon, Chief Engineer
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504

Re: Turner State No. 3
W/2 NE/4 & E/2 NW/4
Section 32, T-20-S, R-37-E
Lea County, New Mexico
1. Simultaneous Dedication to
Existing 160-Acre NSPU
2. Notice of Section 103
Infill Application

Gentlemen:

We are in the process of filing Forms C-101 and C-102 with the Oil Conservation Division District I Office for permission to drill our newly proposed Turner State No. 3 well as an infill Eumont (Gas) well at a standard Eumont (Gas) location consisting of 1980' FNL and 1980' FWL (F) Section 32, T-20-S, R-37-E, Lea County, New Mexico.

We hereby request administrative approval to simultaneously dedicate our newly proposed Turner State No. 3 well (F-32-20S-37E) along with the previously existing Turner State No. 2 well (C-32-20S-37E) to the already existing 160-acre non-standard Eumont (Gas) proration unit consisting of W/2 NE/4 and E/2 NW/4 Section 32, T-20-S, R-37-E, Lea County, New Mexico (Standard P.U. = 640 Acres).

Furthermore, if the proposed well is completed as a commercial producer and in compliance with the Natural Gas Policy Act of 1978, an application will be submitted to the New Mexico Oil Conservation Division to obtain administrative approval for the well as a Section 103 infill well.

Three copies of a color coded land map outlining the subject 160-Acre Eumont proration unit as well as the location of the original Turner State No. 2 Eumont (Gas) well and the proposed location of our Turner State No. 3 infill well are enclosed for your review. Supplementing the enclosed color-coded land plat is a companion table describing by tract number and color all Eumont gas proration units (including the operator of the Eumont gas rights) that