



Mid-Continent Region
Exploration/Production

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

November 17, 2000

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

Re: Amendment to NSL Order # 3854 For the Warren Tubb Gas Pool (87080)

SEMUR Burger B #126
Section 19, T-20-S, R-38-E, M
1310' FSL & 1120' FWL
API # 30-025-34127
Lea County, NM

SEMUR Burger B # 125
Section 18, T-20-S, R-38-E, M
10' FSL & 190' FWL
API # 30-025-34126
Lea County, NM

SEMUR # 128
Section 24, T-20-S, R-37-E, L
2490' FSL & 1310' FEL
API # 30-025-34313
Lea County, NM

Dear Mr. Stogner,

A request was submitted May 24, 2000 to amend NSL Order # 3854 for the SEMUR Burger # 126. No reply has been received to date. In this resubmitted application for the SEMUR Burger #126, the SEMUR Burger "B" # 125 and SEMUR # 128 have been included since their subsequent recompletion in the Tubb formation.

The recent success Conoco has had with the Tubb in the SEMUR unit area encouraged Conoco to file to recomplete the SEMUR Burger B #126, 125 and SEMUR # 128 wells to the Tubb. The recompletion intents were submitted referencing NSL Order #3854 in which it is stated that Conoco is permitted to test the Tubb in all three wells. The SEMUR #126 well was recompleted in the Monument Tubb (pool designation stated in Order #3854) April 4, 2000. The C-104 completion report was submitted May 1, 2000. The pool designation was questioned and upon evaluation no Monument Tubb production could be established within a mile of this wellbore. Mr. Paul Kautz at the OCD in Hobbs decided May 23, 2000 that this well is a gas well and should be placed in the Warren Tubb Gas pool (87080). See attached amended C-102 and well test data. The SEMUR Burger "B" #125 was recompleted (see attached 3160-5 and C-102 plat) in the Warren Tubb Gas pool (87080) August 22, 2000 (see attached completion). The SEMUR #128 was recompleted (see attached 3160-5 and C-102 plat) in the Warren Tubb Gas pool (87080) October 3, 2000 (see attached completion).

Per NSL Order # 3854 requirements Conoco is seeking an amendment to this order to include Tubb unorthodox location requests for the SEMUR Burger B #125, 126 and SEMUR #128. All three wells were completed in the Warren Tubb gas pool. The special pool rules require 330' from the quarter/quarter Section lines and all three wells are at unorthodox locations.

Please find included in this application a copy of the letters that were written to justify the original request for the four non-standard location exceptions in the Tubb formation of the above listed wells. The justification and map previously submitted is still valid. The SEMU # 129 was never drilled.

The existing Tubb "B" participating area only extends as far as the S/2 of the SW ¼ of Section 19. (See attached plat) Conoco will submit a commercial determination and extend the existing Tubb "B" PA to include the entire 160-acre proration unit for the #126 and 125. The 160-acre proration unit for the #128 is already included in the existing Tubb "B" PA. Having established commercial success in the SEMU Burger "B" # 125 & the SEMU # 128 the appropriate acreage is currently being added to extend the Tubb "B" participating area for the Southeast Monument Unit. The newly established PA will also include the NE/4 of Section 24 and the NW/4 of Section 19 to encompass the two sections that are being encroached upon.

If you have any further questions regarding this request please call me at (915) 686-5798.

Sincerely,


Kay Maddox
Regulatory Agent - Conoco

Cc: Oil Conservation Division - Hobbs, New Mexico