

NEW IEXICO ENERGY, M JERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

March 2, 2001

Lori Wrotenbery Director Oil Conservation Division

Conoco, Inc. 10 Desta Drive - Suite 100-W Midland, Texas 79705-4500 Attention: Kay Maddox, Regulatory Agent

Administrative Order NSP-1666-B(L)(SD)

Dear Ms. Maddox:

Reference is made to the following: (i) your application dated November 9, 2000; (ii) the records of the New Mexico Oil Conservation Division ("Division") in Santa Fe, including the files on Division Administrative Order NSP-1666 (L), dated April 6, 1993, Division Administrative Order NSP-1666-A (L) (SD), dated January 10, 2000, and Division Administrative Order NSP-1807, dated October 4, 1999; (iii) your written message dated February 23, 2001 with attachments; (iv) your telephone conversations with Mr. Michael E. Stogner, Division Engineer/Chief Hearing Officer on Wednesday, February 28, 2001 and Thursday, March 1, 2001; and (v) the stipulated declaratory judgement of the First Judicial District Court in Santa Fe County, New Mexico issued on December 15, 2000: all concerning Conoco, Inc.'s requests to combine acreage from two existing non-standard gas spacing and proration units ("GPU") in order to form a single 601.68-acre non-standard GPU consisting of the following acreage in the Eumont Gas Pool:

LEA COUNTY, NEW MEXICO <u>TOWNSHIP 20 SOUTH, RANGE 38 EAST, NMPM</u> Section 19: Lots 1, 2, 3, and 4, W/2 NE/4, SE/4 NE/4, E/2 NW/4, E/2 SW/4, and SE/4.

The Division Director Finds That:

(1) By Administrative Order NSP-1666-A (L) (SD) the Division established a 441.68-acre non-standard GPU comprising Lots 1, 2, 3, and 4, the W/2 NE/4, the E/2 NW/4, and the E/2 SW/4 of Section 19 to be simultaneously dedicated to Conoco, Inc.'s:

- (i) SEMU Burger "B" Well No. 72 (API No. 30-025-12760), located at an unorthodox gas well location for this 441.68acre GPU 330 feet from the North line and 1650 feet from the East line (Unit B) of Section 19;
- (ii) SEMU Burger "B" Well No. 126 (API No. 30-025-34127),