

Texaco USA Producing Department Midland Division PO Box 3109 Midland TX 79702-3109

September 9, 1992

<u>GOV - STATE AND LOCAL GOVERNMENTS</u> Unorthodox Locations Rhodes Yates Unit Well Nos. 14, 15, & 16 Rhodes Yates Seven Rivers Field Lea County, New Mexico

State of New Mexico Energy and Minerals Department Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501-2088

Attention: Mr. Michael E. Stogner

Gentlemen:

An exception, by administrative approval, to Rule 104 F.I. is requested for Texaco Exploration and Production Inc.'s Rhodes Yates Unit Well Nos. 14, 15, & 16. Well No. 15 is on Federal minerals.

The wells must be drilled in these locations to ensure proper development on 20-acre spacing to recover additional reserves in an established waterflood. These reserves could not be recovered with the current 80-acre, 5-spot pattern.

Texaco is the only "affected" offset operator to these wells and we grant ourselves a waiver to this request.

Attached are Forms C-102, showing the location for each well and a lease plat showing the existing wells.

Yours very truly,

C.P. Basham / cwt

C. P. Basham Drilling Operations Manager

CWH: cwh

CC: NMOCD, P. O. Box 1980, Hobbs, NM 88240 CC: BLM, P. O. Box 1778, Carlsbad, NM 88220