



June 2, 1993

GOV - STATE AND LOCAL GOVERNMENTS

Unorthodox Locations

Rhodes Yates Unit Well No. 17
W. H. Rhodes Federal "A" Well No. 7
W. H. Rhodes Federal "B" NCT-1
Well Nos. 23, 24, 25, 28, 29, and 30
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 the captioned wells. Rhodes Yates Unit Well No. 17 is on State land and the remaining wells are 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 the Rhodes Yates Unit Well No. 17, the W. H. Rhodes Federal "A" Well No. 7, and the W. H. Rhodes Federal "B" NCT-1 Well No. 25, and we grant ourselves a waiver to this request. There are no "affected" offset operators to the remaining wells.

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 / cwh

C. P. Basham
Drilling Operations Manager

CWH:

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

RECEIVED

JUL 07 1993

JOJO HOS. L.S.
OFFICE