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November 24, 2000

Michael E. Stogner
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Pursuant to Division Rule 104.F.(2), Roden Oil Company applies for administrative approval of an unorthodox oil well location for the following well:

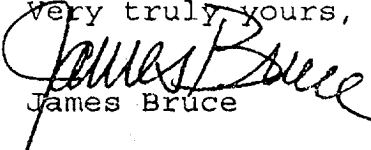
MIRO Fed. "35" Well No. 1
1250 feet FNL & 1000 feet FWL
NW $\frac{1}{4}$ NW $\frac{1}{4}$ S35, Township 26 South, Range 35 East, NMPM
Lea County, New Mexico

The well was drilled to test the Morrow formation, and Lots 1-4 and the NW $\frac{1}{4}$ (all) of irregular Section 35 were dedicated to the well. The location is orthodox for the Morrow. The well was unsuccessful in the Morrow, but it was re-completed uphole in the Wolfcamp formation (wildcat Wolfcamp) at a depth of approximately 13,000 feet. Under statewide rules, spacing is 40 acres, with wells to be located no closer than 330 feet to a quarter-quarter section line. Attached as Exhibit A is a survey of the well's location.

Submitted as Exhibit B is a land plat around the proposed well. All of Section 35 is a single federal lease, with common royalty, working, and overriding royalty ownership. Therefore, no one is adversely affected by this application, and notice of the application has not been given to any offset.

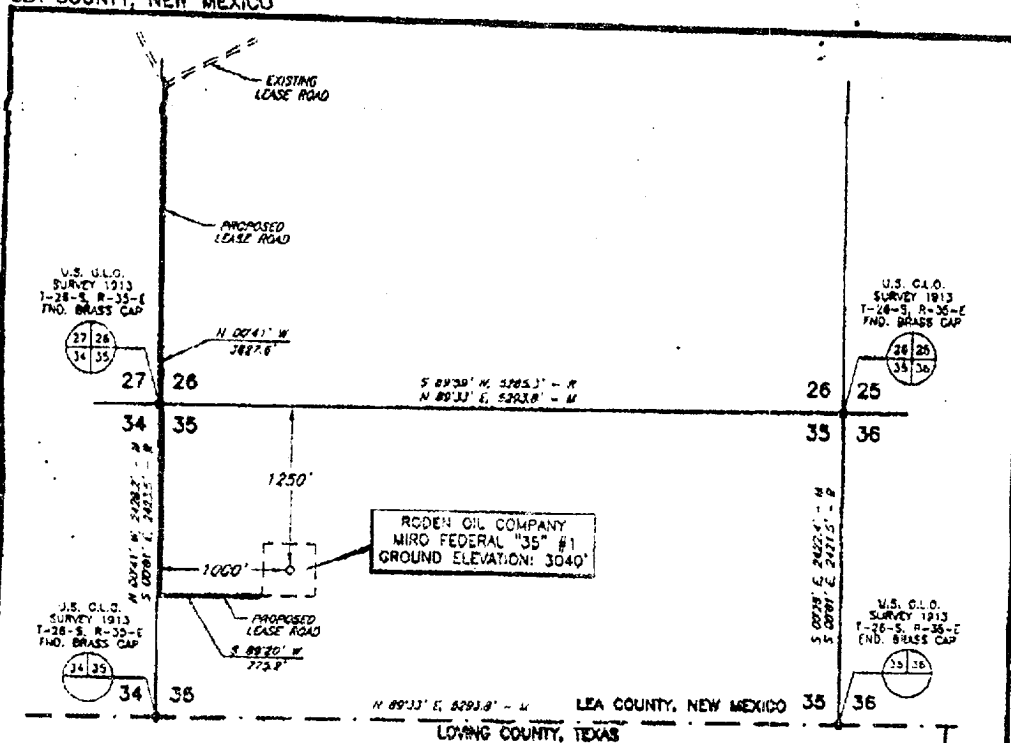
Please call me if you need any further information on this matter.

Very truly yours,

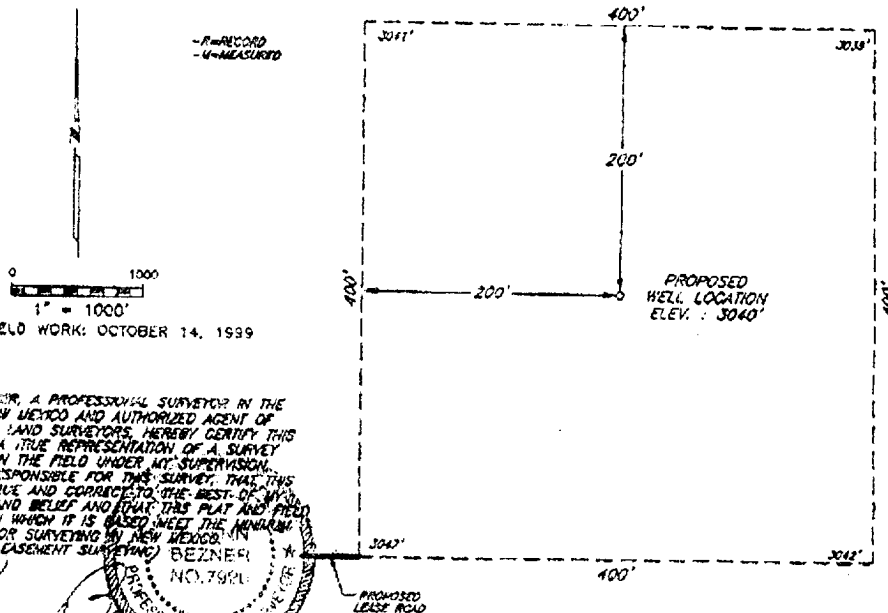

James Bruce

Attorney for Roden Oil Company

PLAT SHOWING PRO. J
WELL LOCATION AND LEASE ROAD IN
SECTION 35, T-26-S, R-35-E, N.M.P.M.
LEA COUNTY, NEW MEXICO



PLAN VIEW
1" = 1000'



DATE OF FIELD WORK: OCTOBER 14, 1999

I, V. L. BEZNER, A PROFESSIONAL SURVEYOR IN THE STATE OF NEW MEXICO AND AUTHORIZED AGENT OF TOPOGRAPHIC LAND SURVEYORS, HEREBY CERTIFY THIS PLAT TO BE A TRUE REPRESENTATION OF A SURVEY PERFORMED IN THE FIELD UNDER MY SUPERVISION. THAT I AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND THAT THIS PLAT AND FIELD SURVEY UPON WHICH IT IS BASED MEET THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO (RULE 3000, CASEMENT SURVEYING) BEZNER

V. L. BEZNER, P.S. NO. 7920

RODEN OIL COMPANY

SURVEYING AND MAPPING BY
TOPOGRAPHIC LAND SURVEYORS
MIDLAND, TEXAS

SCALE: AS SHOWN

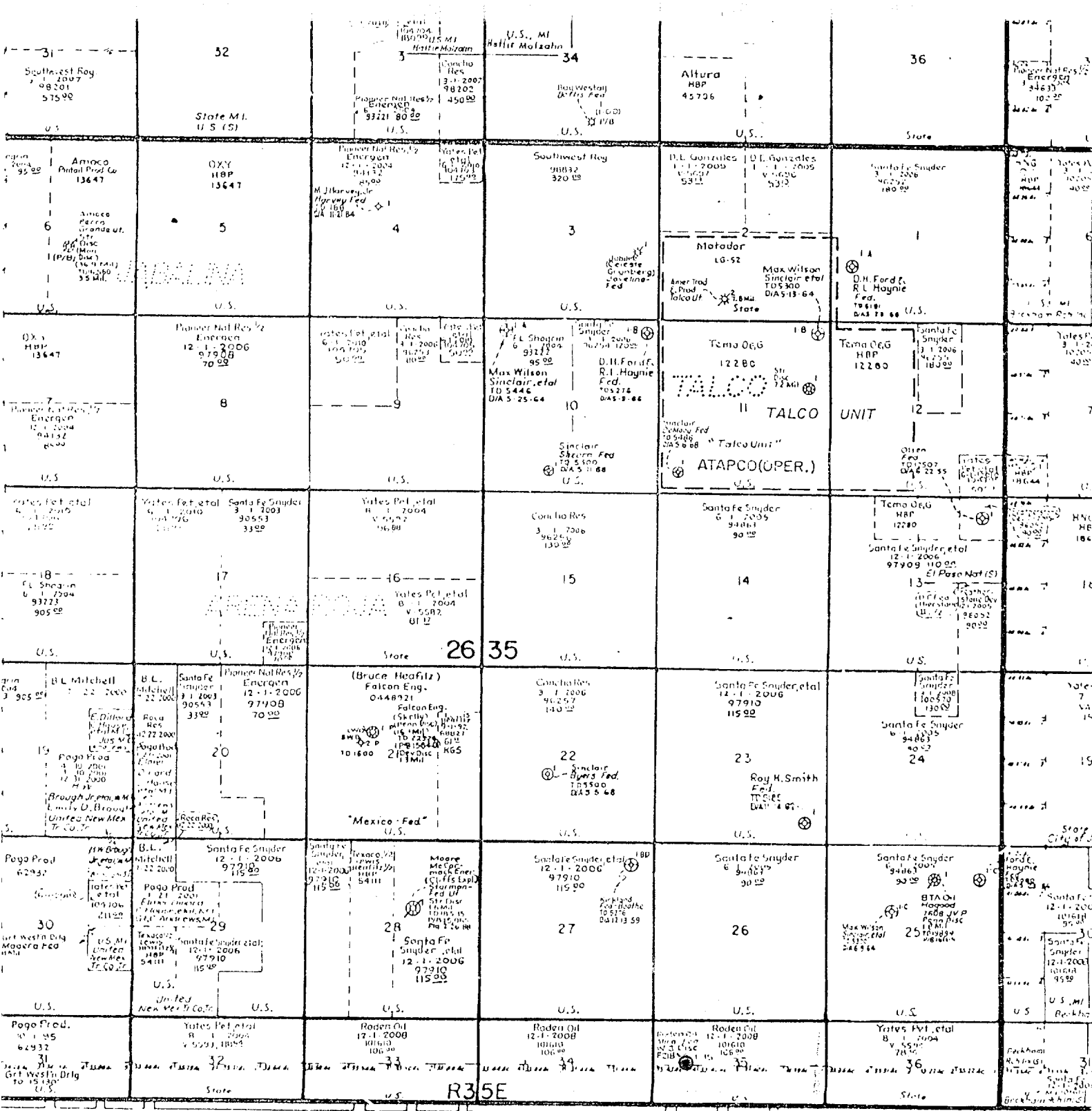
DATE: OCTOBER 14, 1999

JOB NO.: 65753-F

QUAD NO.: 21 SE

SHEET: 1 OF 1

EXHIBIT A



map was prepared
p Company shall in no
cies that occur.
uld be made before

marks and information
duce or copy this
hout written
s prohibited by law.

EXHIBIT B



LOVING County

WINKLER County

LEGEND

- CO2 Well, Not Shown
- Wellcut Below 5000' or Discov
- Location
- Abandoned Producer
- Complete — Producing Oil
- Completed — Producing Gas
- Dry & Abandoned
- Fee Owner — Slant Lettering
- Lease Owner — Vertical Lettering
- State Highway (F.M.)
- State Highway
- U.S. Highway

