STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT



OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

July 2, 1997

Texaco Exploration and Production, Inc. P.O. Box 3109
Midland, Texas 79702
Attention: C. Wade Howard

Administrative Order NSL-3820

Dear Mr. Howard:

Reference is made to your application dated May 6, 1997 of an unorthodox oil well location for both the Justis-Blinebry and Justis-Tubb Drinkard Pools for Texaco's proposed C. C. Fristoe "A" Federal NCT-1 Well No. 13. Said well to be drilled 1400 feet from the North line and 330 feet from the West line (Unit E) of Section 35, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. It is our understanding that this well is to be dually completed in both zones.

The existing standard 40-acre oil spacing and proration unit in the Justis-Blinebry Pool comprising the SW/4 NW/4 of said Section 35, which is presently dedicated to Texaco's C. C. Fristoe "A" Federal NCT-1 Well No. 10 (API No. 30-025-21412), located at a standard oil well location 2080 feet from the North line and 660 feet from the West line of said Section 35, and said 40-acre tract to form a standard 40-acre oil spacing and proration unit in the Justis-Tubb Drinkard Pool, are to be dedicated to said well.

It is our understanding that such unorthodox location is necessitated for geologic reasons in that this location is approximately equidistance to the two offsetting Justis-Blinebry oil producers within the single 80-acre federal lease (NM-10934) comprising the two 40-acre oil spacing and proration units that comprise the W/2 NW/4 of said Section 35. The proposed location should enable Texaco to encounter lateral discontinuous reservoirs that can not be depleted from the two existing wells in the W/2 NW/4 of said Section 35. Further, should secondary recovery be implemented within the Justis-Blinebry Pool in the immediate area, the proposed location will allow the implementation of a standard production/injection pattern.

The application has been duly filed under the provisions of Rule 104.F of the General Rules and Regulations of the New Mexico Oil Conservation Division ("Division"), revised by Division Order No. R-10533, issued by the Oil Conservation Commission in Case 11,351 on January 18, 1996.

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