

**THE APPLICATION OF CONOCOPHILLIPS COMPANY TO AMEND THE FIELD RULES
FOR THE BIG COWBOY (LOBO) FIELD, WEBB COUNTY, TEXAS**

Heard by: Donna K. Chandler on September 23, 2010

Appearances:

Jamie Nielson
Greg Cloud
Todd Lippincott

Glenn Johnson

Representing:

ConocoPhillips Company

Chesapeake Operating, Inc.

EXAMINER'S REPORT AND RECOMMENDATION

STATEMENT OF THE CASE

Field rules for the Big Cowboy (Lobo) Field were adopted on March 21, 1994 in Docket No. 04-0201533. The rules in effect for the field are summarized as follows:

1. Designation of the field as the correlative interval from 7,748 feet to 8,971 feet as shown on the log of the Hirsch Well No. 1-537;
2. Allocation based on 75% deliverability and 25% per well.

ConocoPhillips requests that a 467'-1,200' well spacing rule be adopted for the field, including a provision to eliminate the between-well spacing requirement, as long as the well to be permitted is at least 660 feet from a lease line. If the well to be permitted is less than 660 feet from a lease line, then the well must be 1,200 feet from the nearest well on the lease, or a Rule 37 exception must be obtained.

This application was unopposed and the examiner recommends adoption of the requested field rule change.

DISCUSSION OF THE EVIDENCE

The Big Cowboy (Lobo) Field was discovered in 1979. The field is classified as non-associated with AOF status. There are 93 wells on the current schedule.

The subject field is one of 11 fields in the Wilcox Lobo trend in Webb and Zapata Counties for which a change in spacing rule is being requested. The Wilcox throughout the area is highly faulted and as a result of the very complex geology, it is difficult to develop the many separate fault blocks which comprise the various fields. Recent infill wells are encountering fault blocks which have virgin pressure.

Several fields in the area have already adopted a spacing rule which eliminates the between-well spacing requirement. ConocoPhillips is proposing a between-well spacing rule which is more restrictive. The proposed rule eliminates a between-well spacing requirement as long as the well to be permitted is at least 660 feet from lease lines. If the proposed well is less than 660 feet from lease lines, then the well would require a Rule 37 exception if it is less than 1,200 feet from the nearest well. This rule would allow operators to exploit interior portions of their leases, while still giving notice of a between-well spacing exception to offsetting operators if the proposed location is less than 660 feet from the lease line. Offset operators will be given an opportunity to protest an application if they believe that such location would encounter a fault block which may extend to their property.

FINDINGS OF FACT

1. Notice of this hearing was given to all persons entitled to notice at least ten days prior to the date of hearing.
2. Field rules for the Big Cowboy (Lobo) Field provide for a designated interval and allocation based on 75% deliverability and 25% per well.
3. The Big Cowboy (Lobo) Field is classified as non-associated with AOF status. There are 93 wells on the current schedule.
4. The Wilcox throughout the area of Webb and Zapata Counties is highly faulted. As a result of the very complex geology, it is difficult to develop the many separate fault blocks which comprise the various fields.
5. Many fields in the Wilcox Lobo trend in Webb and Zapata Counties have rules which eliminate the between-well spacing requirement.
6. The spacing rule proposed by ConocoPhillips eliminates a between-well spacing requirement as long as the well to be permitted is at least 660 feet from lease lines. The proposed rule will provide for ease of development of interior portions of leases.

CONCLUSIONS OF LAW

1. Proper notice of this hearing was given to all persons legally entitled to notice.
2. All things have occurred or been accomplished to give the Railroad Commission jurisdiction in this matter.
3. Adopting the proposed spacing rule for the Big Cowboy (Lobo) Field is necessary to prevent waste and protect correlative rights.

EXAMINER'S RECOMMENDATION

Based on the above findings and conclusions, the examiner recommends that the spacing rule for the Big Cowboy (Lobo) Field be adopted as proposed by ConocoPhillips.

Respectfully submitted,

Donna K. Chandler
Technical Examiner