BEFORE THE INDUSTRIAL COMMISSION

OF THE STATE OF NORTH DAKOTA

IN THE MATTER OF A HEARING CALLED ON A MOTION OF THE COMMISSION TO CONSIDER THE APPLICATION OF CONTINENTAL OIL COMPANY FOR AN ORDER PERMITTING THE DRILLING OF CERTAIN INJECTION WELLS ALONG THE DICKINSON HEATH SAND UNIT BOUNDARY IN STARK COUNTY, NORTH DAKOTA.

CASE NO. 1283
ORDER NO. 1386

ORDER OF THE COMMISSION

BY THE COMMISSION:

Pursuant to legal notice this cause came on for hearing at 9:30 a.m. on the 14th day of October, 1975, in Bismarck, North Dakota, before the Industrial Commission of North Dakota, hereinafter referred to as the "Commission."

NOW, on this 13th day of November, 1975, the Commission, a quorum being present, having considered the testimony adduced and the exhibits received at said hearing, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant is the Unit Operator for the Dickinson Heath Sand Unit, Stark County, North Dakota, a statutory type Unit established by Commission Order No. 1202 on March 13, 1975.

(3) That due to a lack of information all of the Heath Sand reservoir was not included in the Dickinson Heath Sand Unit. Present information indicates the oil saturated Heath Sand extends beyond the Dickinson Heath Sand Unit boundaries to the north and west of Section 33, Township 140 North, Range 97 West, Stark County, North Dakota, into what has been designated the South Heart-Heath Pool.

(4) That the Dickinson Heath Sand Unit might be expanded to include said lands containing oil saturated Heath Sand reservoir but by using the existing Dickinson Unit unitization formula, the lands outside the Unit Area might not receive their equitable share of Unit participation.

(5) That because of secondary recovery operations through water flooding and the possible resulting increase in reservoir pressures, oil might, in time, migrate off unitized lands onto the lands outside the unit area mentioned in (3) above.

(6) That in order to halt the possible migration of oil from the Dickinson Heath Sand Unit to wells in the wells in the South Heart Field, the applicant

requests permission to drill two lease line injection wells, one located 400 feet from the west line and 10 feet from the north line, and the other 3640 feet from the west line and 10 feet from the north line of Section 33, Township 140 North, Range 97 West, Stark County, North Dakota.

(7) That in December, 1975, wells in the Dickinson Heath Sand Unit will have produced all of the primary reserves from the Heath Pool within said unit.

(8) That wells in the South Heart Field adjacent to the boundary of the Dickinson Heath Sand Unit have produced a year or less and have not recovered the primary reserves from that portion of the Heath Pool.

(9) That injection of water into the Heath Pool through the wells at the locations proposed in (6) above might cause the "watering out" and premature abandonment of wells in the South Heart Field and would not protect the correlative rights of the owners of interest in the wells in the South Heart Field.

(10) That the injection of water into the Heath Pool through the wells at the locations proposed in (6) above should not be permitted at this time; however, the proposed operation might increase the ultimate recovery of oil from the Heath Pool and may be reconsidered after June, 1976.

IT IS THEREFORE ORDERED:

(1) That this application for permission to drill two injection wells, one located 400 feet from the west line and 10 feet from the north line and the other 3640 feet from the west line and 10 feet from the north line of Section 33, Township 140 North, Range 97 West, Stark County, North Dakota, be, and the same is hereby denied.

(2) That this order shall continue in full force and effect until further order of the Commission.

DONE, in Bismarck, North Dakota, this 13th day of November, 1975.

THE NORTH DAKOTA INDUSTRIAL COMMISSION

Arthur A. Link

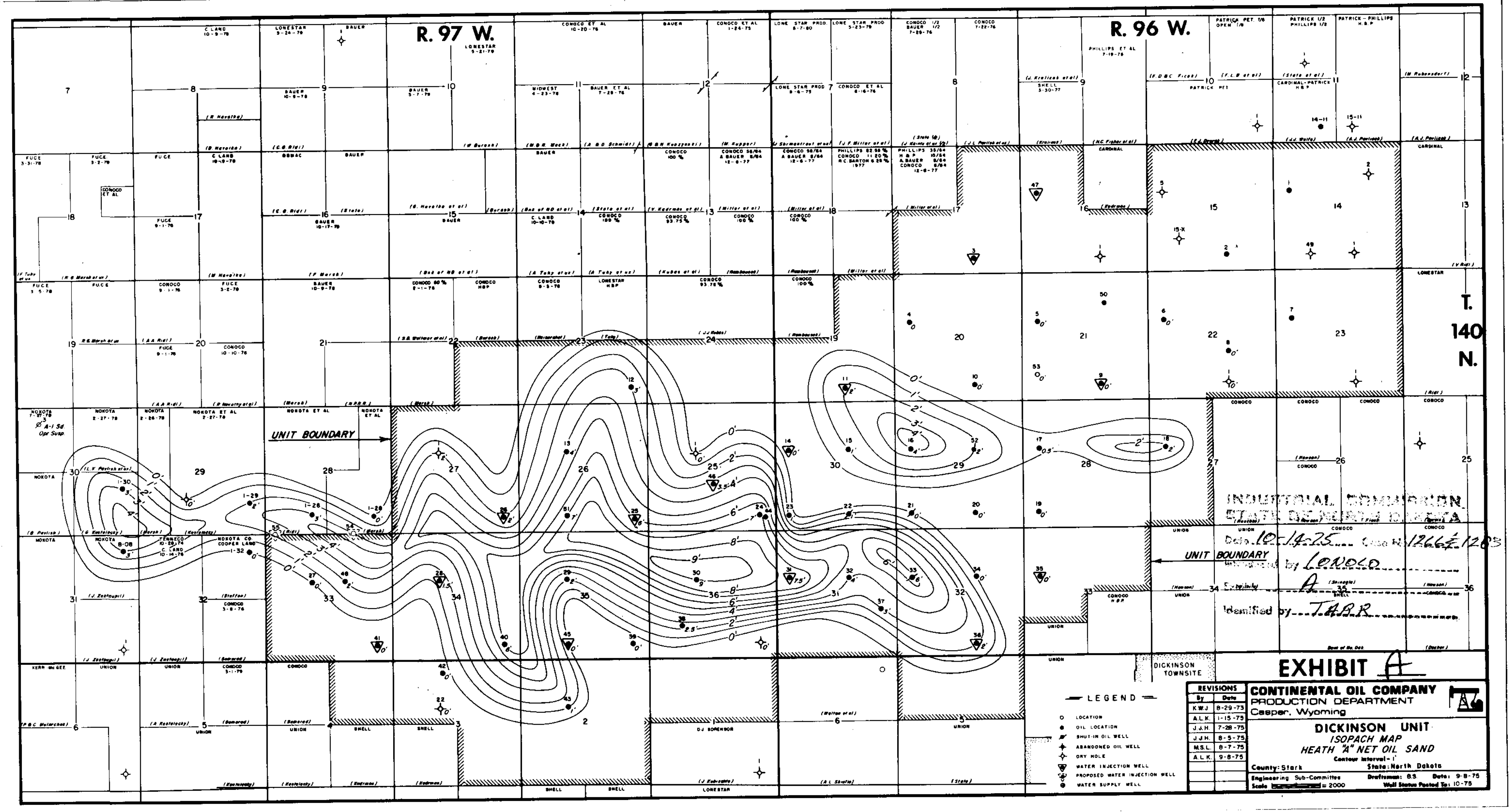
Arthur A. Link, Governor

Allen I. Olson

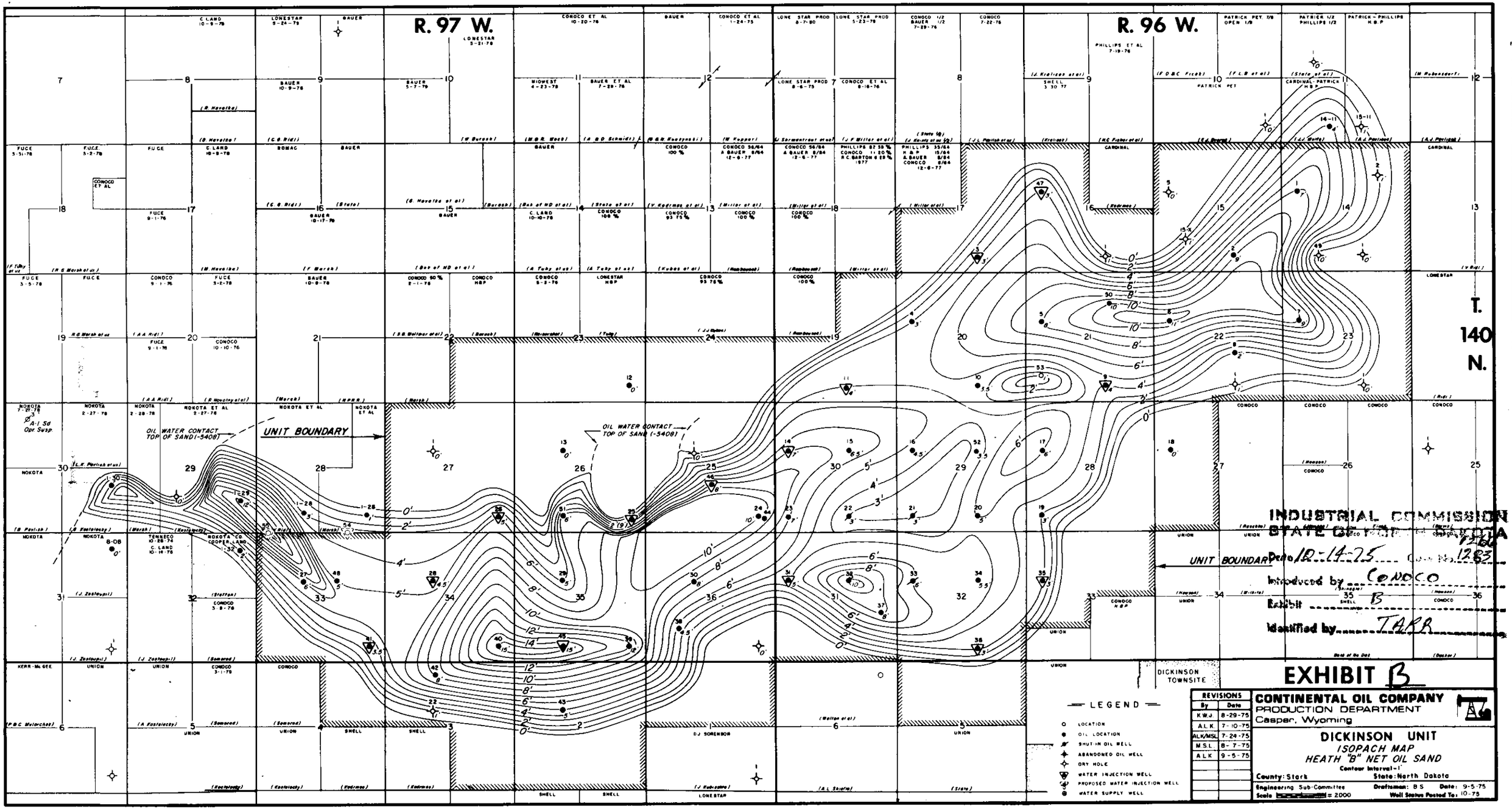
Allen I. Olson, Attorney General

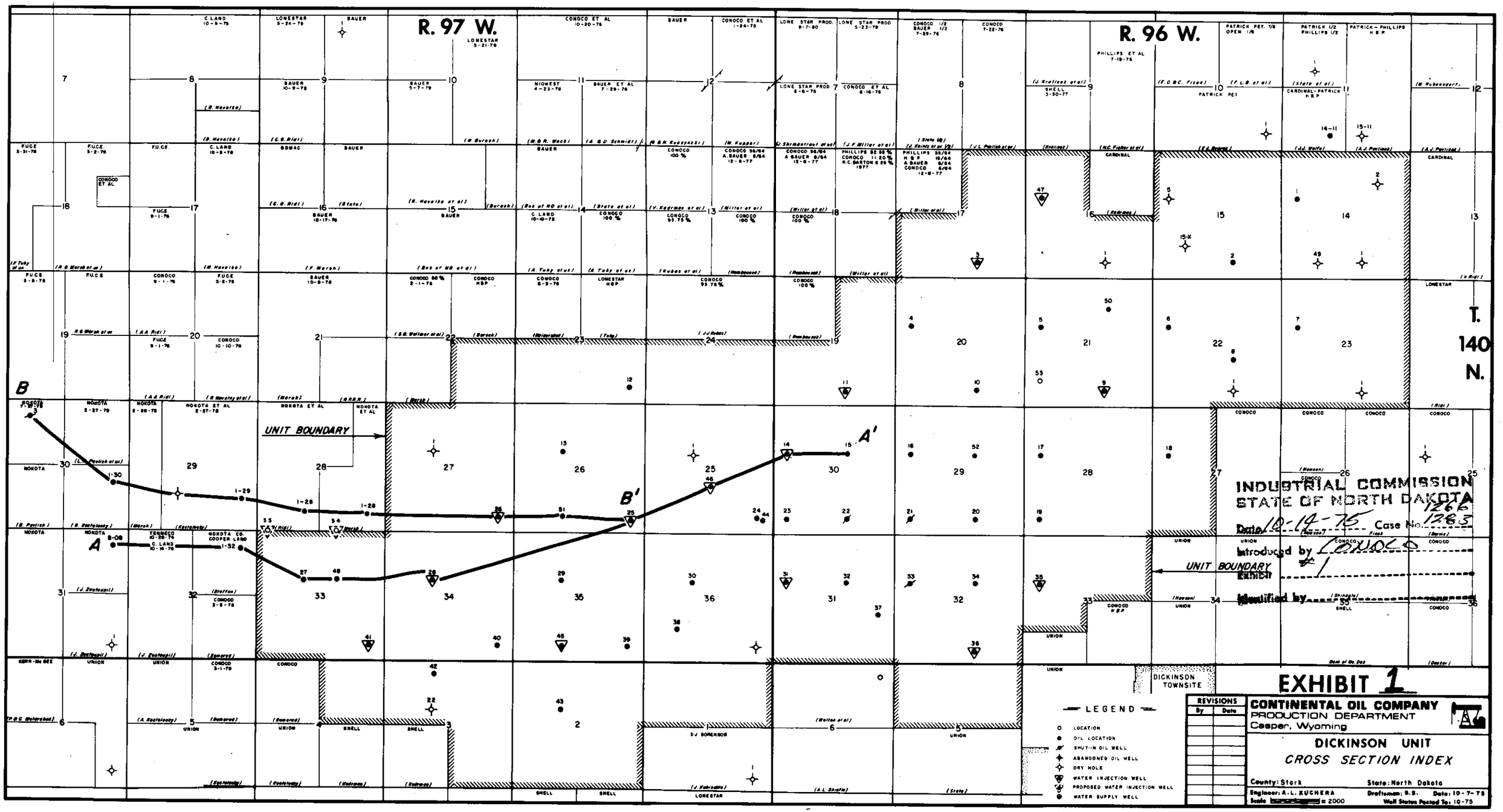
Myron Just

Myron Just, Commissioner of Agriculture



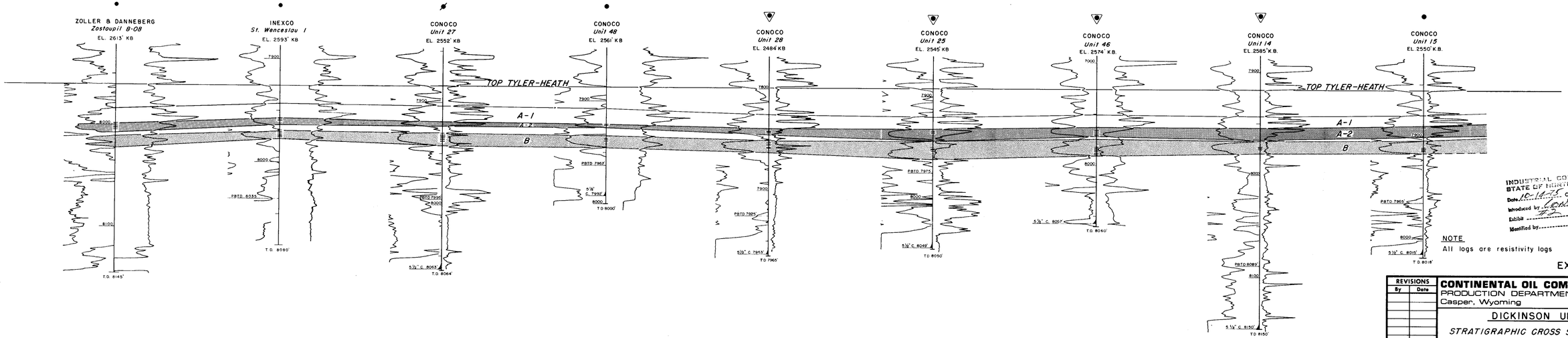
R. 97 W.
R. 96 W.
T. 140 N.
UNIT BOUNDARY
UNIT BOUNDARY
DICKINSON TOWNSITE
EXHIBIT A
LEGEND
LOCATION
OIL LOCATION
SHUT-IN OIL WELL
ABANDONED OIL WELL
DRY HOLE
WATER INJECTION WELL
PROPOSED WATER INJECTION WELL
WATER SUPPLY WELL
REVISIONS
By | Date
K.W.J. 8-29-73
A.L.K. 1-15-75
J.J.H. 7-28-75
J.J.H. 8-5-75
M.S.L. 8-7-75
A.L.K. 9-8-75
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming
DICKINSON UNIT
ISOPACH MAP
HEATH "A" NET OIL SAND
Contour Interval - 1'
County: Stark
State: North Dakota
Engineering Sub-Committee
Draftsman: B.S.
Date: 9-8-75
Scale = 2000
Well Status Posted To: 10-75
Date 10-14-75
Introduced by CONOCO
Exhibit A
Identified by TABR


R. 97 W.
R. 96 W.
T. 140 N.
OIL WATER CONTACT TOP OF SAND (-5408)
UNIT BOUNDARY
LEGEND
LOCATION
OIL LOCATION
SHUT-IN OIL WELL
ABANDONED OIL WELL
DRY HOLE
WATER INJECTION WELL
PROPOSED WATER INJECTION WELL
WATER SUPPLY WELL
DICKINSON TOWNSITE
INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date 10-14-75
Case No. 1265
Order No. 1260
Introduced by CONOCO
Exhibit B
Identified by TAKR
EXHIBIT B
REVISIONS
By Date
K.W.J. 8-29-75
A.L.K. 7-10-75
ALK/MSL 7-24-75
M.S.L. 8-7-75
A.L.K. 9-5-75
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming
DICKINSON UNIT
ISOPACH MAP
HEATH "B" NET OIL SAND
Contour Interval-1'
County: Stark
State: North Dakota
Engineering Sub-Committee
Draftsman: B.S.
Date: 9-5-75
Scale = 2000
Well Status Posted To: 10-75


R. 97 W.
R. 96 W.
T. 140 N.
UNIT BOUNDARY
A
A'
B
B'
INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date 10-14-75 Case No. 1265
Introduced by CONOCO
Exhibit #1
Identified by
EXHIBIT 1
LEGEND
LOCATION
OIL LOCATION
SHUT-IN OIL WELL
ABANDONED OIL WELL
DRY HOLE
WATER INJECTION WELL
PROPOSED WATER INJECTION WELL
WATER SUPPLY WELL
REVISIONS
By
Date
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming
DICKINSON UNIT
CROSS SECTION INDEX
County: Stark
State: North Dakota
Engineer: A.L. KUCHERA
Draftsman: S.S.
Date: 10-7-75
Scale = 2000
Well Status Posted To: 10-75

A
SW

A'
NE



INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date 10-14-75 Case No. 12885
Introduced by CONOCO
Exhibit #2
Identified by

NOTE
All logs are resistivity logs

EXHIBIT 2

REVISIONS	
By	Date

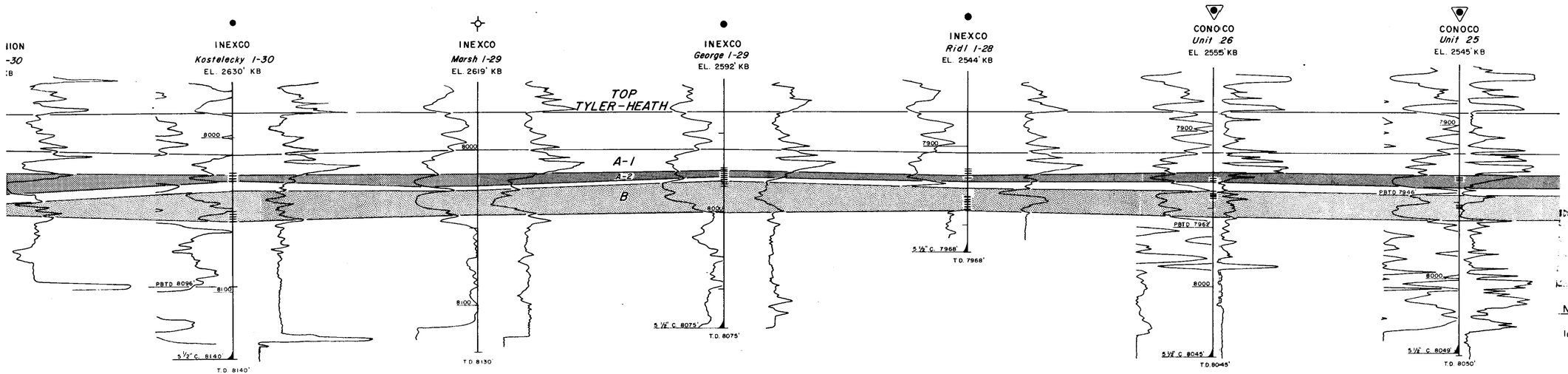
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming

DICKINSON UNIT

STRATIGRAPHIC CROSS SECTION A-A'

County: Stark **State:** North Dakota
Engineer: A. L. Kuchera **Draftsman:** B.S. **Date:** 1-21-75
Scale: Vert. 1" = 40', Horiz. No Scale

B'
E



10-14-73
Denver, Colorado

NOTE
All logs are resistivity logs

EXHIBIT 3

REVISIONS	
By	Date

CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming

DICKINSON UNIT

STRATIGRAPHIC CROSS SECTION B-B'

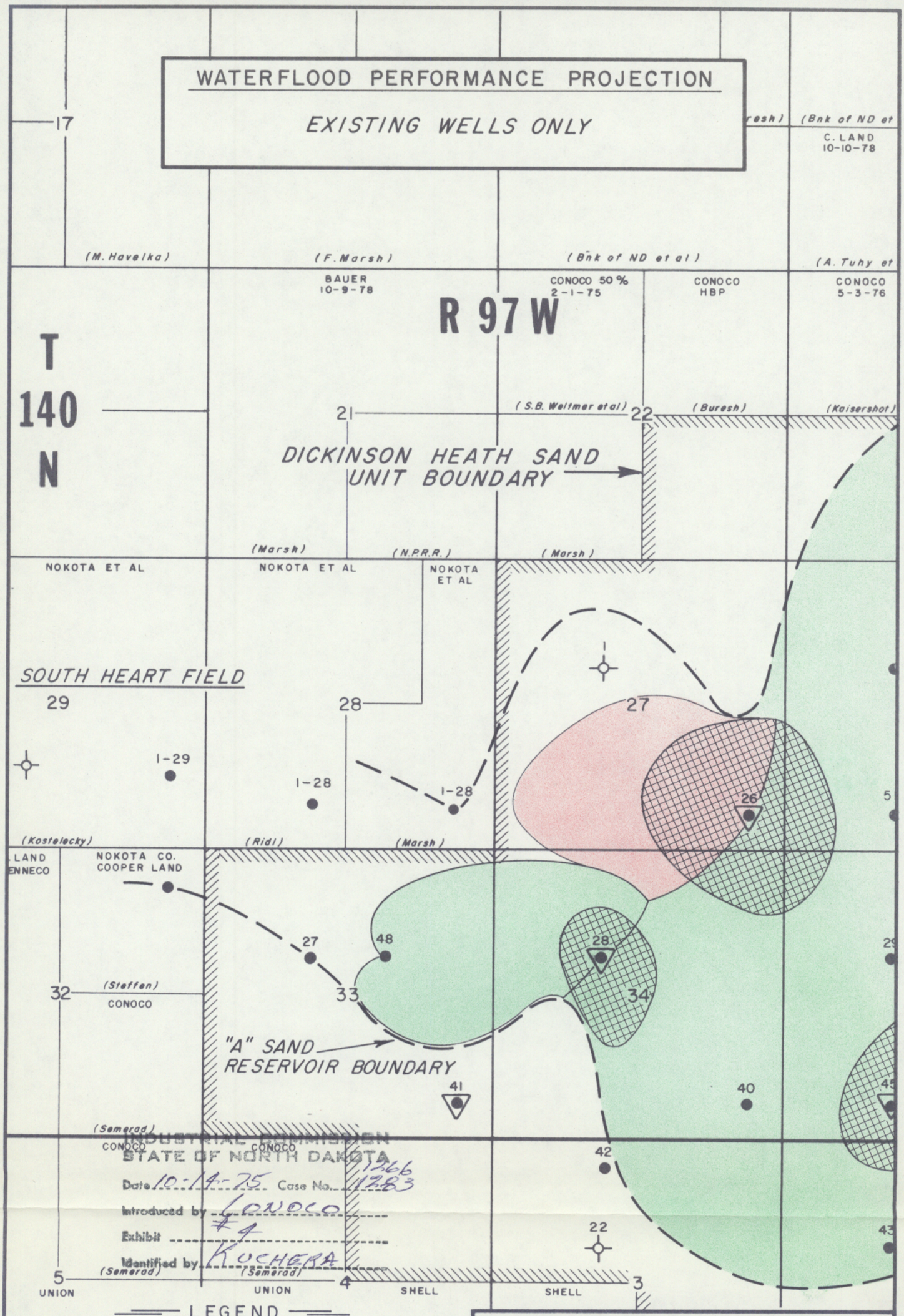
County: Stark **State:** Wyoming

Engineer: A. L. Kuchera **Draftsman:** B. S. **Date:** 1-21-75

Scale: Vert. 1" = 40', Horiz. No Scale

WATERFLOOD PERFORMANCE PROJECTION

EXISTING WELLS ONLY



INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date 10-14-75 Case No. 1266 1283
Introduced by Conoco
Exhibit #4
Identified by Kuchera

LEGEND

- Reservoir Area Drained By Unit Wells
- Estimated Limits Of Present Waterflood Front
- Oil swept out of unit when last producing well WOR=30
- Location
- Oil Well
- Dry Hole
- Water Injection Well

CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming

DICKINSON HEATH SAND UNIT

EXHIBIT 4 — "A" SAND

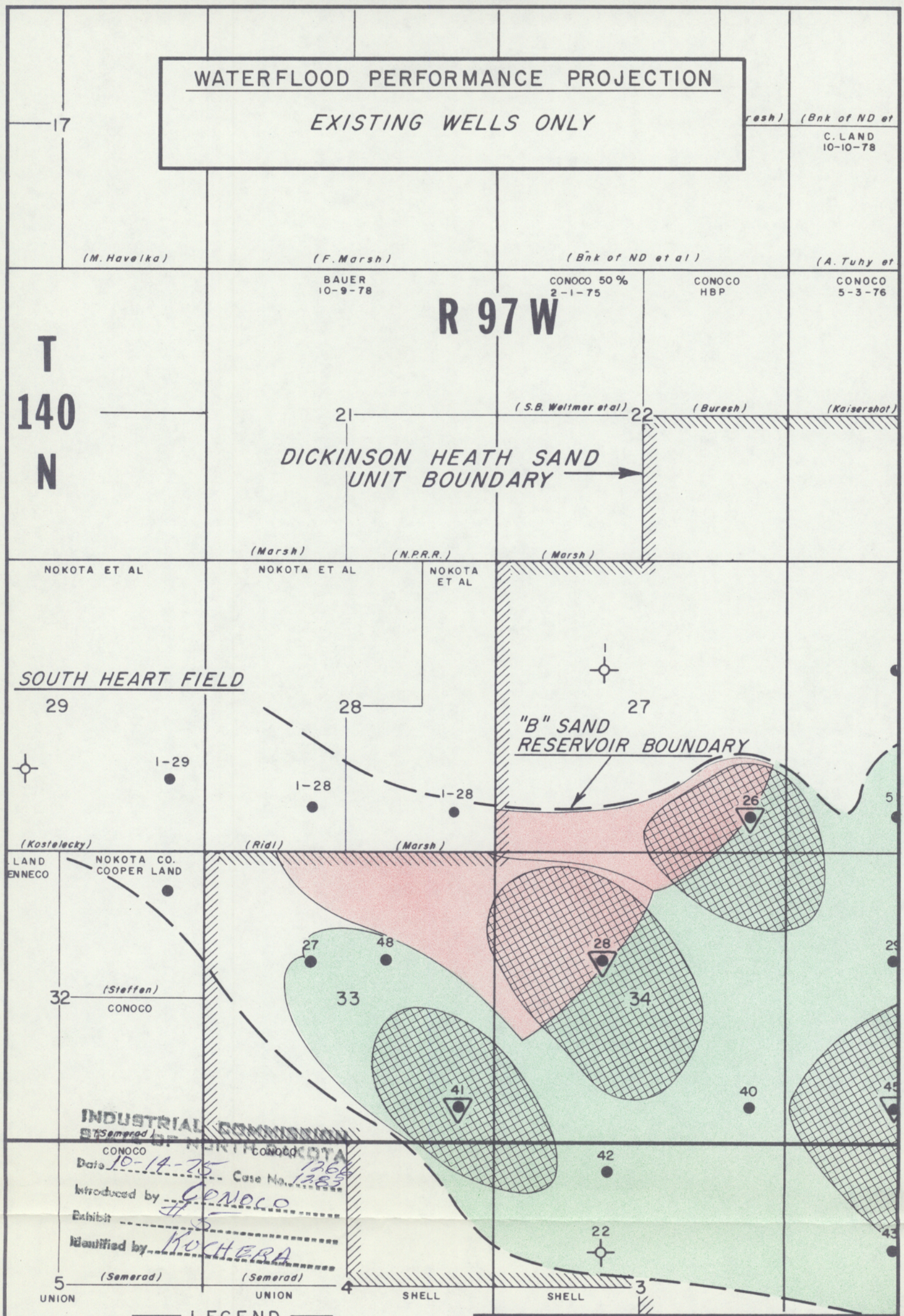
County: Stark **State:** North Dakota

Engineer: A.L. Kuchera **Draftsman:** B.S. **Date:** 10-10-75

Scale = 2000' **Well Status Posted To:** 10-75

WATERFLOOD PERFORMANCE PROJECTION

EXISTING WELLS ONLY



INDUSTRIAL COMMISSION
OF NORTH DAKOTA
Date 10-14-75 Case No. 1266 1267
Introduced by CONOCO
Exhibit #5
Identified by KUCHERA

LEGEND

- Reservoir Area Drained By Unit Wells
- Estimated Limits Of Present Waterflood Front
- Oil swept out of unit when last producing well WOR = 30
- Location
- Oil Well
- Dry Hole
- Water Injection Well

CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming

DICKINSON HEATH SAND UNIT

EXHIBIT 5—"B" SAND

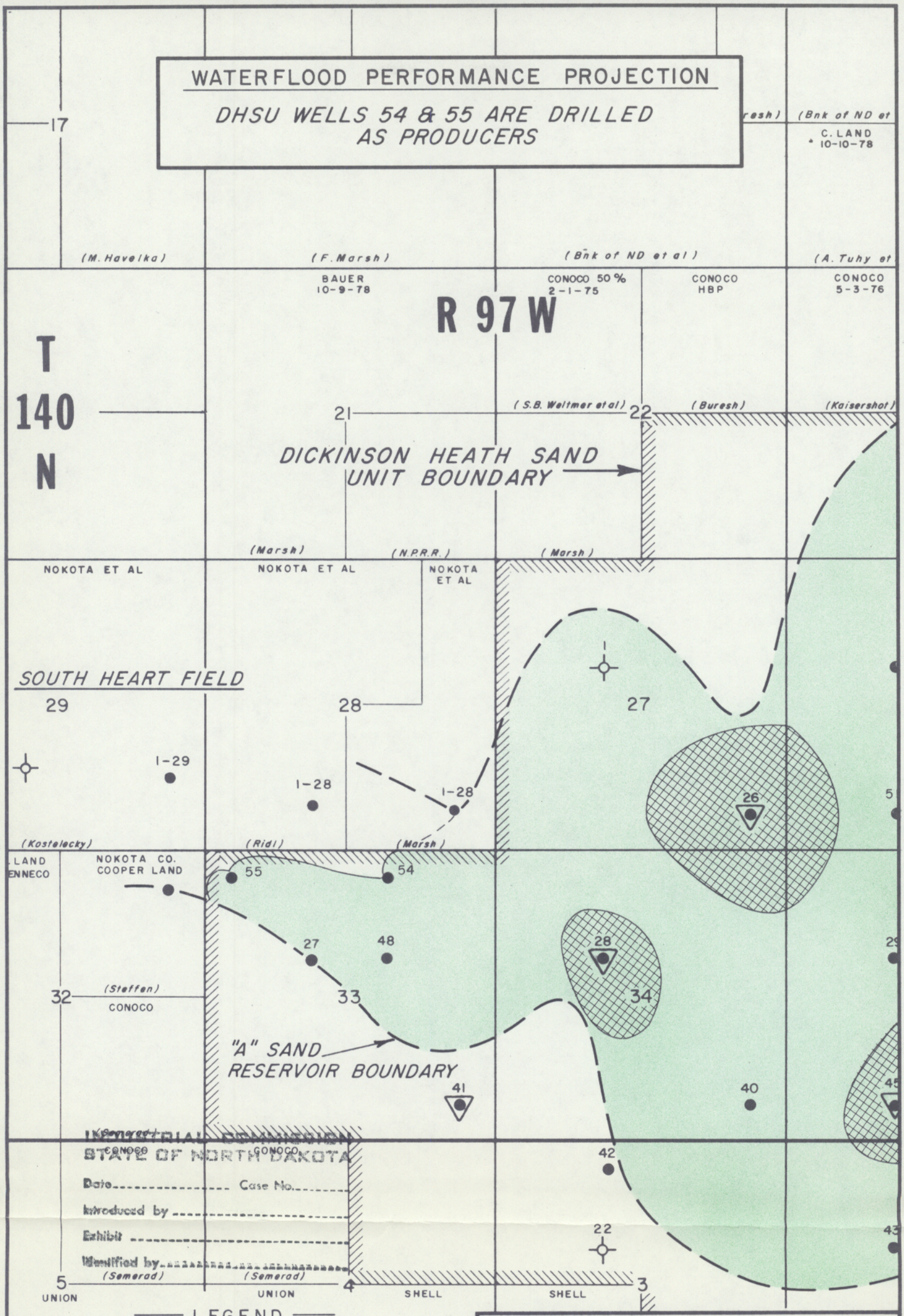
County: Stark **State:** North Dakota

Engineer: A.L. Kuchera **Draftsman:** B.S. **Date:** 10-10-75

Scale = 2000' **Well Status Posted To:** 10-75

WATERFLOOD PERFORMANCE PROJECTION

DHSU WELLS 54 & 55 ARE DRILLED AS PRODUCERS



STATE OF NORTH DAKOTA

Date ..... Case No. .....

Introduced by .....

Exhibit .....

Identified by .....

LEGEND

- Reservoir Area Drained By Unit Wells
- Estimated Limits Of Present Waterflood Front
- Oil swept out of unit when last producing well WOR = 30
- Location
- Oil Well
- Dry Hole
- Water Injection Well

CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming

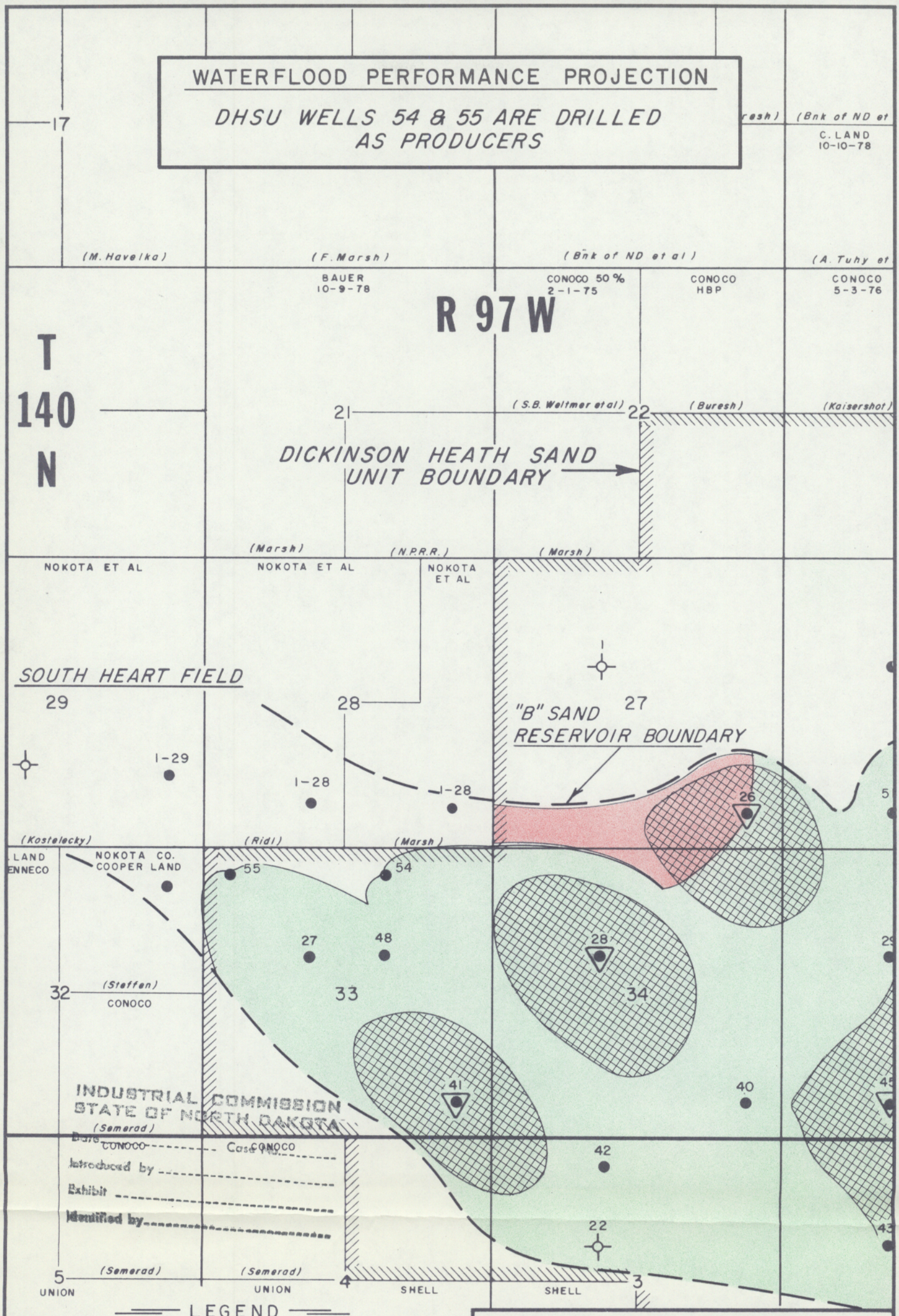
DICKINSON HEATH SAND UNIT

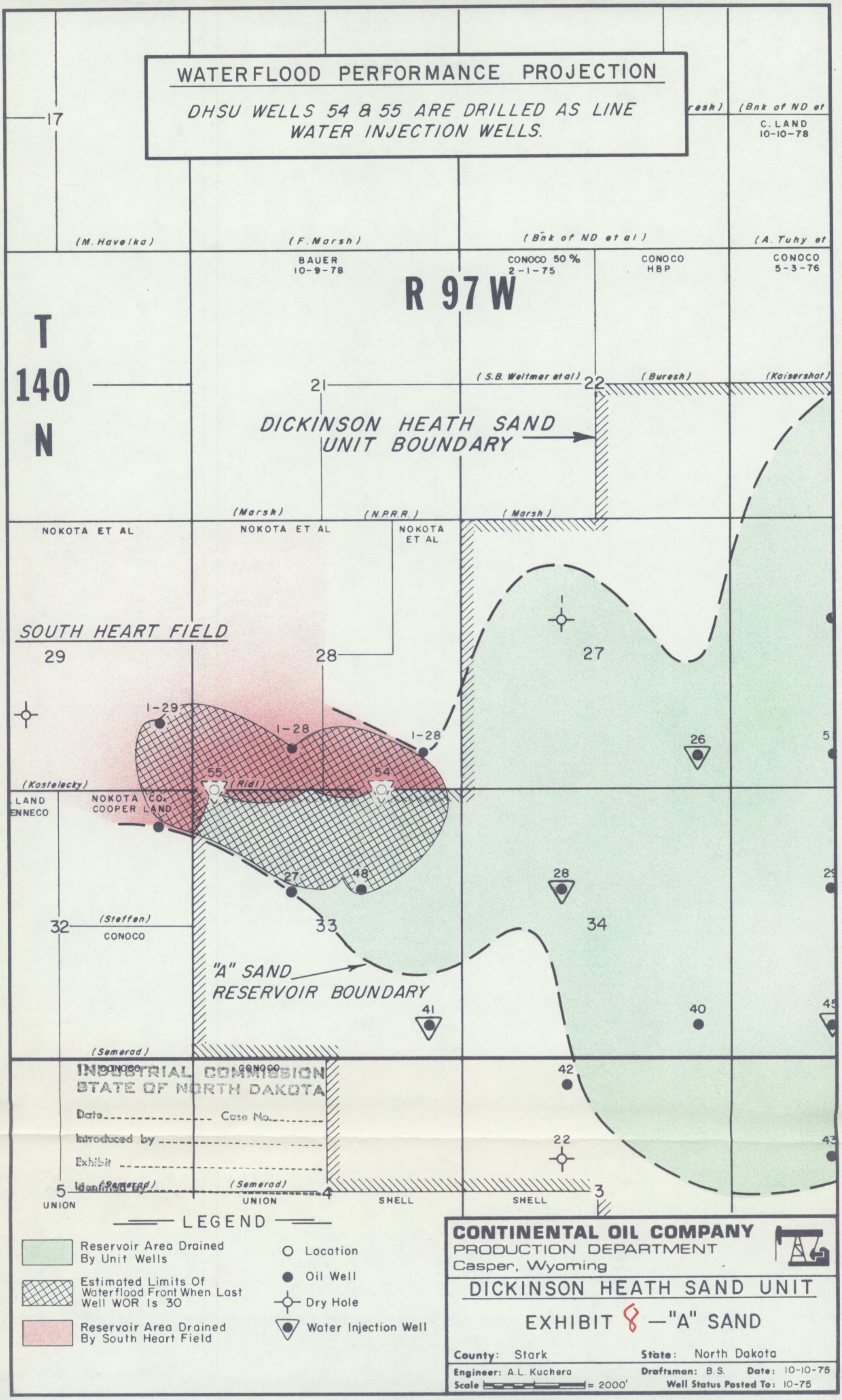
EXHIBIT 6 — "A" SAND

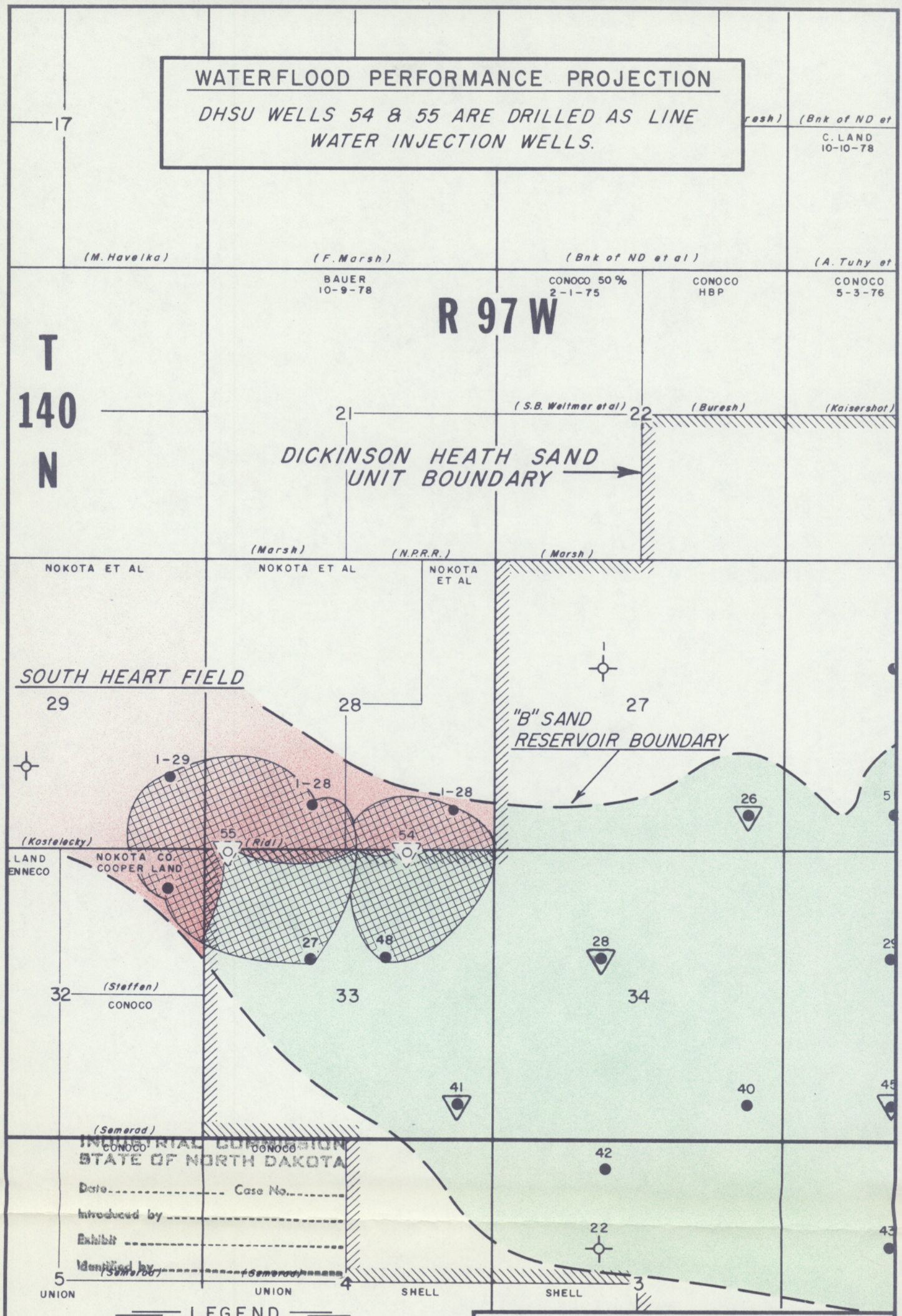
County: Stark **State:** North Dakota

Engineer: A.L. Kuchera **Draftsman:** B.S. **Date:** 10-10-75

Scale = 2000' **Well Status Posted To:** 10-75


WATERFLOOD PERFORMANCE PROJECTION
DHSU WELLS 54 & 55 ARE DRILLED AS PRODUCERS
17
(Bnk of ND et
C. LAND
10-10-78
(M. Havelka)
(F. Marsh)
(Bnk of ND et al)
(A. Tuhy et
BAUER
10-9-78
CONOCO 50%
2-1-75
CONOCO
HBP
CONOCO
5-3-76
R 97 W
T
140
N
21
(S.B. Weltmer et al)
22
(Buresh)
(Kaisershot)
DICKINSON HEATH SAND
UNIT BOUNDARY
(Marsh)
(N.P.R.R.)
(Marsh)
NOKOTA ET AL
NOKOTA ET AL
NOKOTA
ET AL
SOUTH HEART FIELD
29
28
27
"B" SAND
RESERVOIR BOUNDARY
1-29
1-28
1-28
26
(Kostelecky)
(Ridl)
(Marsh)
LAND
ENNECO
NOKOTA CO.
COOPER LAND
55
54
27
48
28
33
34
32
(Steffen)
CONOCO
41
40
INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
(Semerad)
CONOCO
CONOCO
42
22
5
(Semerad)
(Semerad)
4
3
UNION
UNION
SHELL
SHELL
LEGEND
Reservoir Area Drained By Unit Wells
Estimated Limits Of Present Waterflood Front
Oil swept out of unit when last producing well WOR = 30
Location
Oil Well
Dry Hole
Water Injection Well
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming
DICKINSON HEATH SAND UNIT
EXHIBIT 7—"B" SAND
County: Stark
State: North Dakota
Engineer: A.L. Kuchera
Draftsman: B.S.
Date: 10-10-75
Scale = 2000'
Well Status Posted To: 10-75


WATERFLOOD PERFORMANCE PROJECTION
DHSU WELLS 54 & 55 ARE DRILLED AS LINE WATER INJECTION WELLS.
17
(Bnk of ND et
C. LAND
10-10-78
(M. Havelka)
(F. Marsh)
(Bnk of ND et al)
(A. Tuhy et
BAUER
10-9-78
CONOCO 50%
2-1-75
CONOCO
HBP
CONOCO
5-3-76
R 97 W
T
140
N
21
(S.B. Weltmer et al)
22
(Buresh)
(Kaisershot)
DICKINSON HEATH SAND UNIT BOUNDARY
(Marsh)
(N.P.R.R.)
(Marsh)
NOKOTA ET AL
NOKOTA ET AL
NOKOTA ET AL
SOUTH HEART FIELD
29
28
27
1
1-29
1-28
1-28
26
55
54
(Kostelecky)
(Ridl)
NOKOTA CO.
COOPER LAND
27
48
28
34
32
(Steffen)
CONOCO
33
"A" SAND RESERVOIR BOUNDARY
41
40
42
22
(Semerad)
CONOCO
INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date
Case No.
Introduced by
Exhibit
Identified by
(Semerad)
(Semerad)
5
UNION
UNION
4
SHELL
SHELL
3
LEGEND
Reservoir Area Drained By Unit Wells
Estimated Limits Of Waterflood Front When Last Well WOR Is 30
Reservoir Area Drained By South Heart Field
Location
Oil Well
Dry Hole
Water Injection Well
CONTINENTAL OIL COMPANY
PRODUCTION DEPARTMENT
Casper, Wyoming
DICKINSON HEATH SAND UNIT
EXHIBIT 8 — "A" SAND
County: Stark
State: North Dakota
Engineer: A.L. Kuchera
Draftsman: B.S.
Date: 10-10-75
Scale = 2000'
Well Status Posted To: 10-75



INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
Date..... Case No.....
Introduced by .....
Exhibit .....
Identified by .....

CONTINENTAL OIL COMPANY

Field DICKINSON HEATH SAND UNIT Nº 48 Date 9-3-75

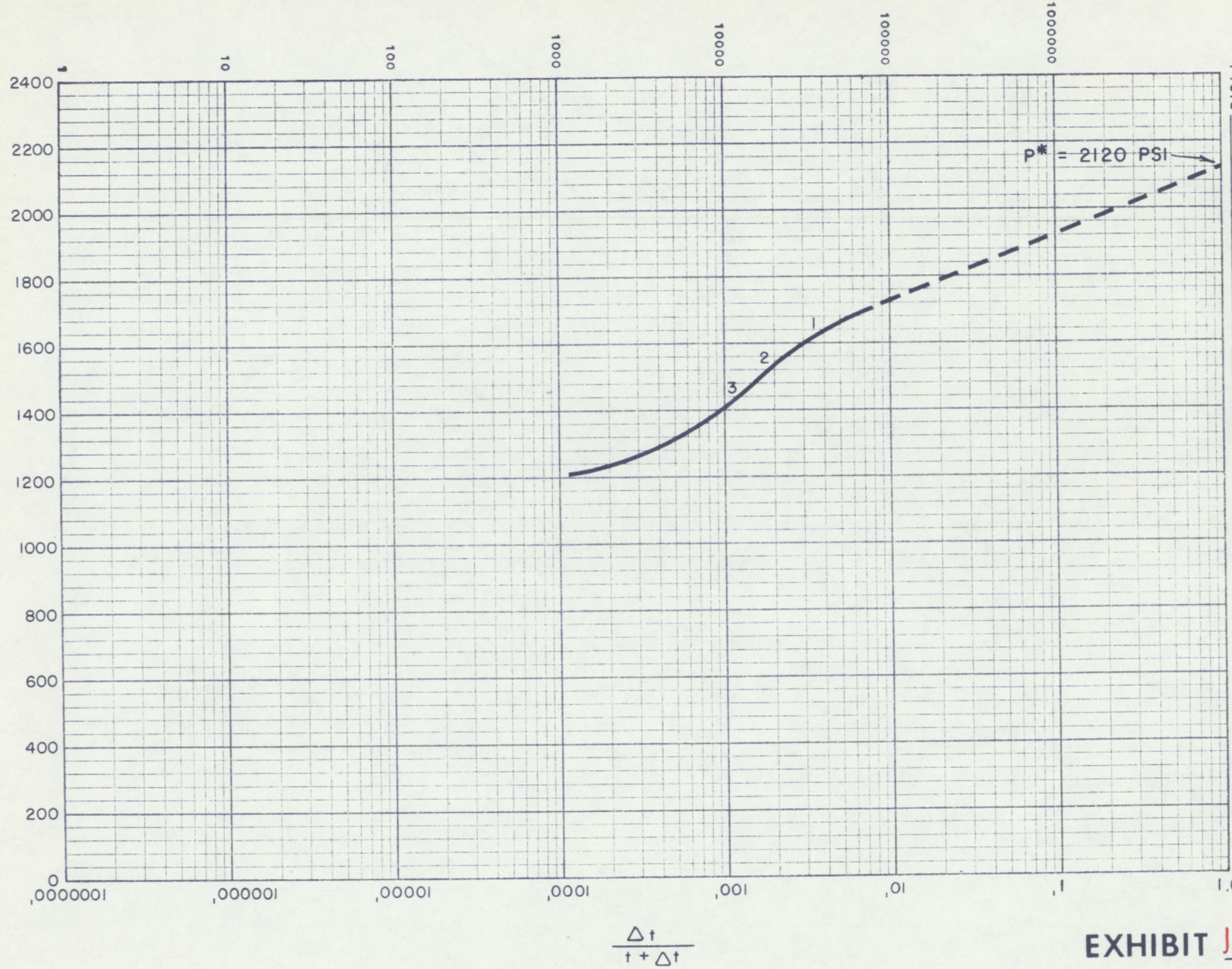


EXHIBIT 10

MSL 9-22-75

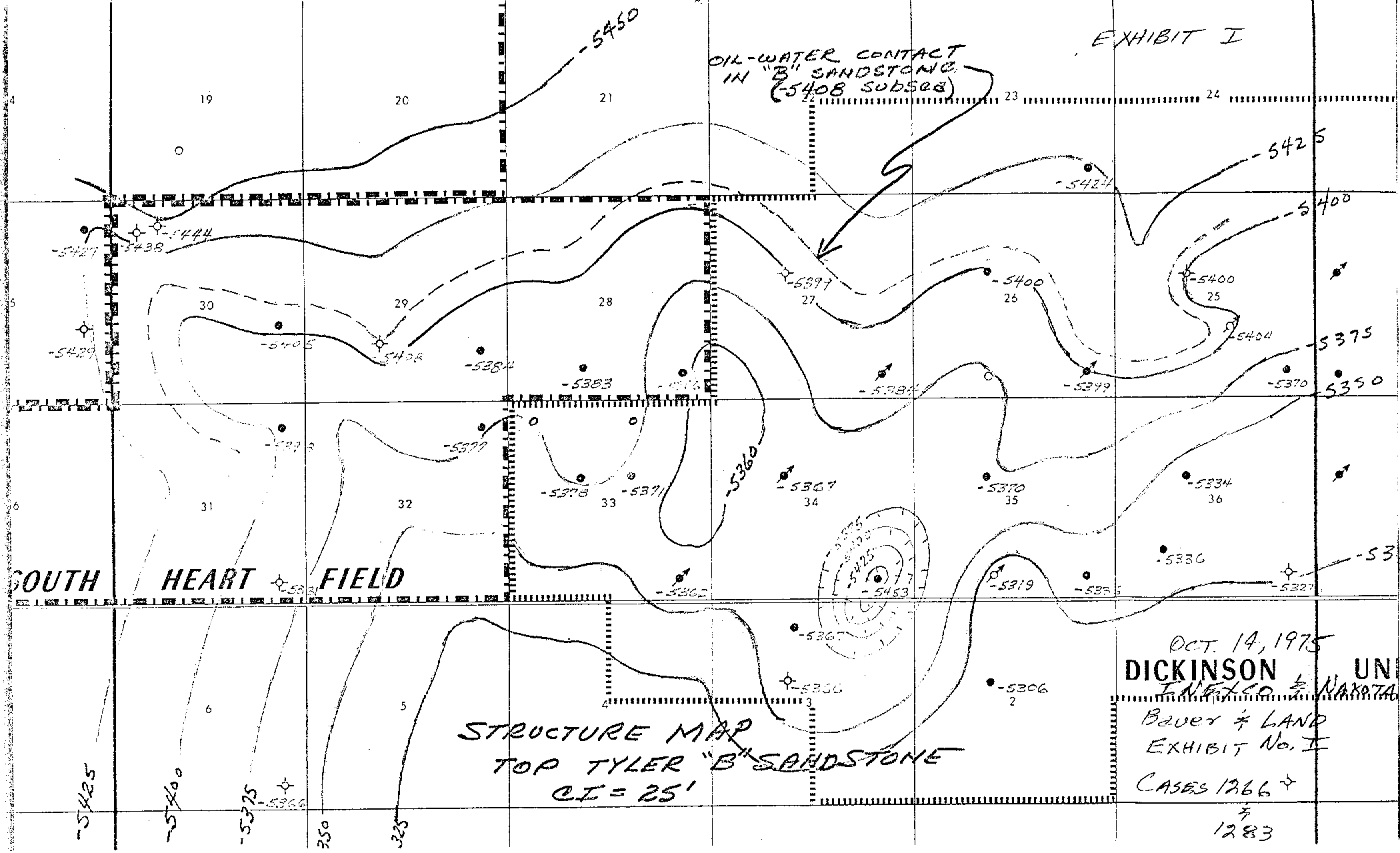
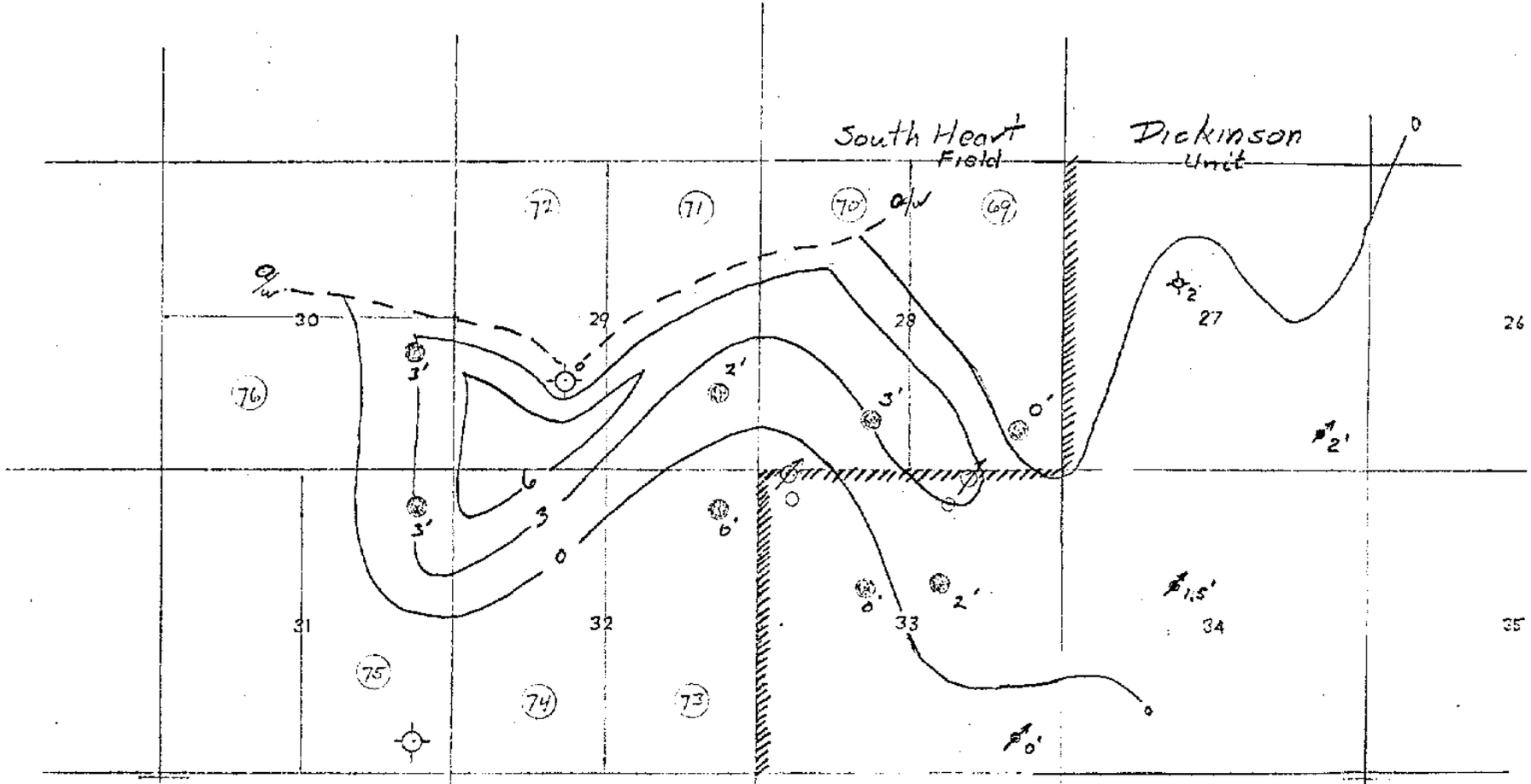


EXHIBIT I
OIL-WATER CONTACT
IN "B" SANDSTONE
(-5408 SUBSEA)
-5450
-5425
-5400
-5375
-5350
-5360
19
20
21
23
24
25
26
27
28
29
30
31
32
33
34
35
36
2
3
4
5
6
-5424
-5427
-5438
-5444
-5429
-5405
-5408
-5384
-5383
-5399
-5400
-5404
-5399
-5370
-5384
-5377
-5378
-5371
-5367
-5370
-5334
-5336
-5362
-5453
-5319
-5327
-5367
-5366
-5306
SOUTH HEART FIELD
STRUCTURE MAP
TOP TYLER "B" SANDSTONE
CI = 25'
OCT. 14, 1975
DICKINSON UNI
INEXCO & NAKOTA
Bauer & LAND
EXHIBIT No. I
CASES 1266
&
1283

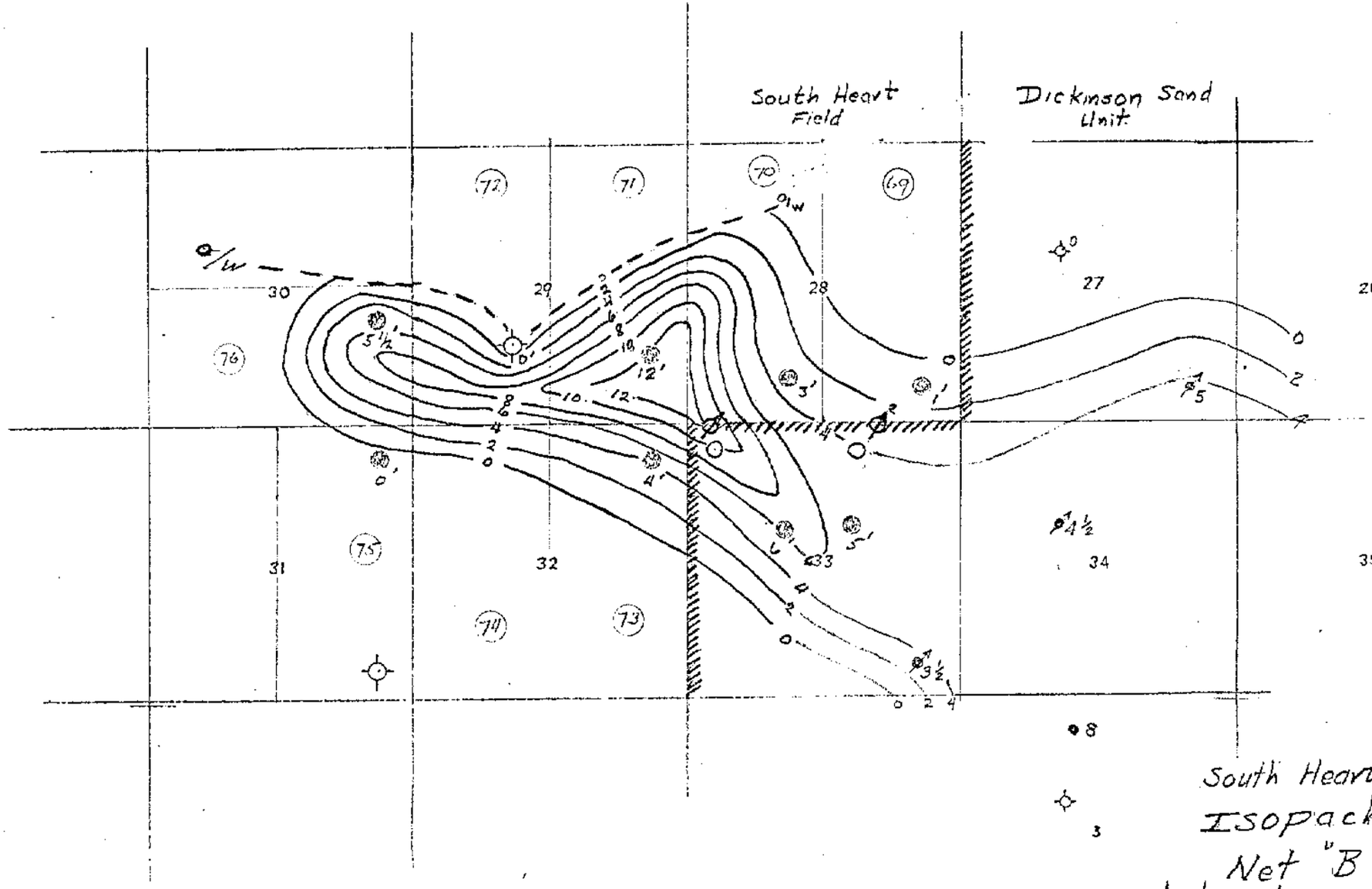
Exhibit II



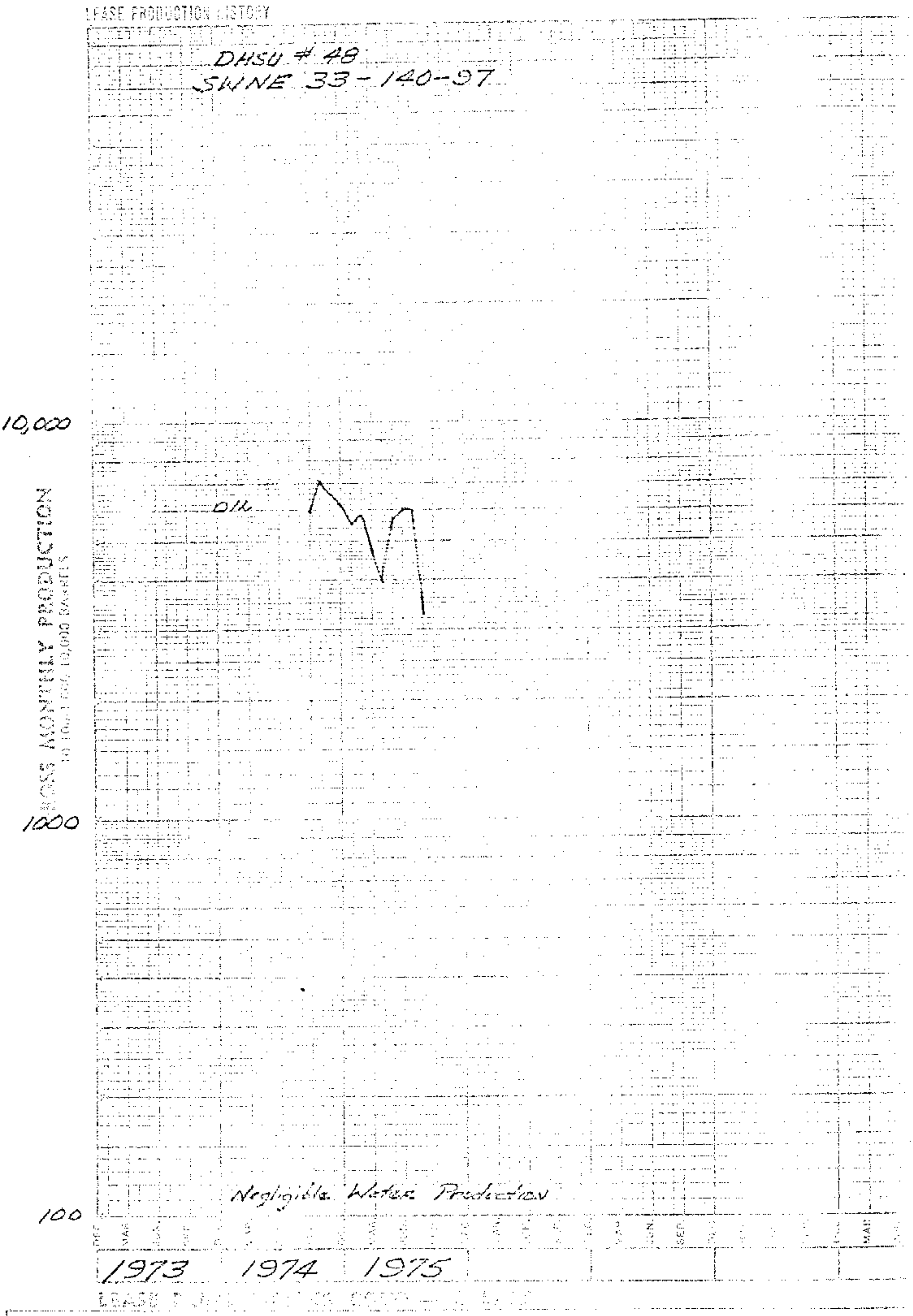
South Heart
Isopach
Net "A" sand Pay
CI = 3' 1" = 1 mile

Oct 14, 1975
INEXCO & NDAKOTA
Bauer & LAND
CASES #1266 & 1283

Exhibit II



South Heart
Isopach
Net "B" Sand Pay
Bauer ½ Land CI = 2'
CASES # 1266 & 9/22/75
1283
Oct. 14, 1975



AMOUNT

PER ...

ACCUMULATED PRODUCTION—BARRELS

GROSS

PER ACRE

ESTIMATED OIL RESERVES—BARRELS

GROSS FUTURE

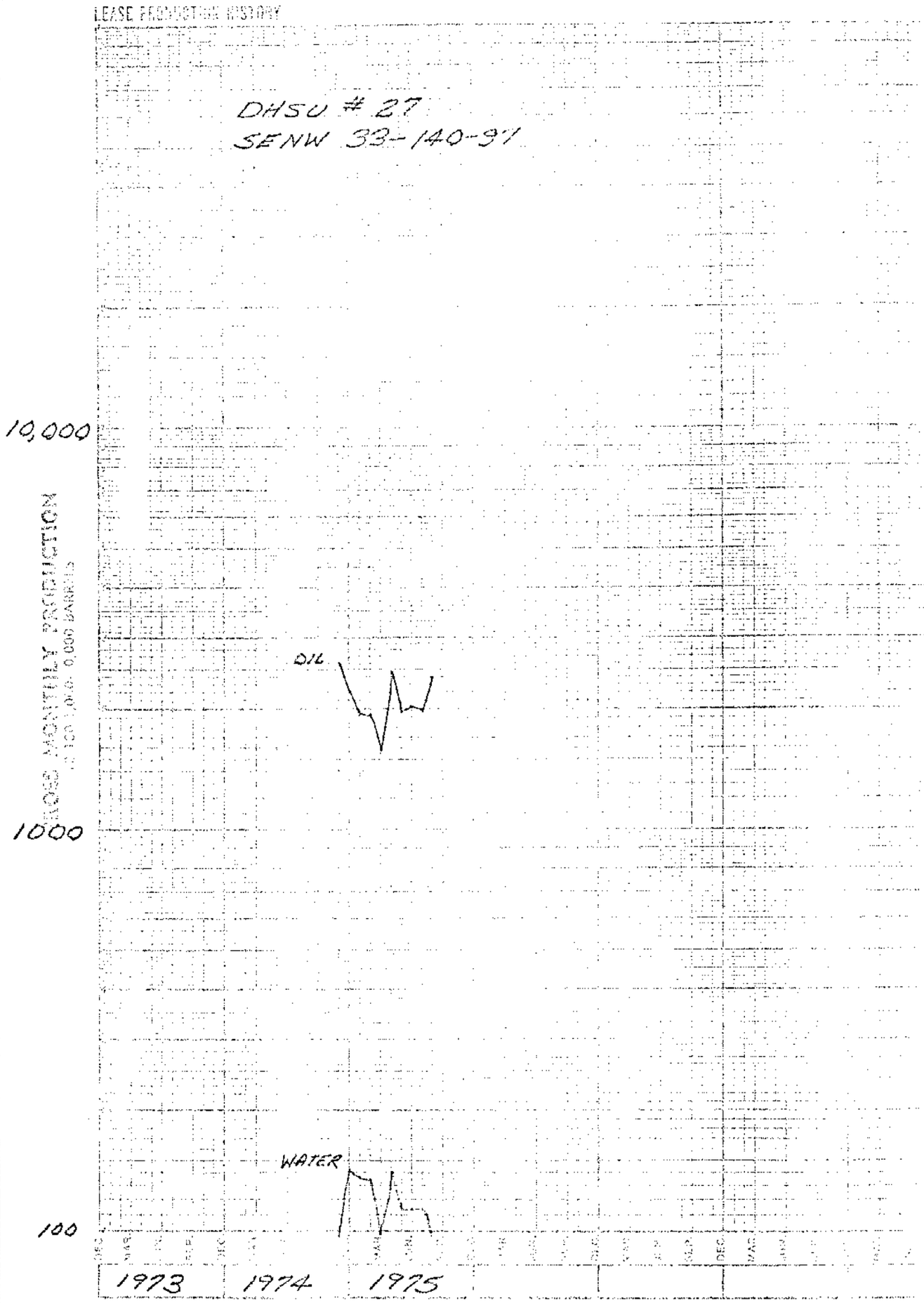
GROSS ULTIMATE

NET FUTURE

BAUER & LAND
EXHIBIT IV
CASES 1266 & 1283
OCT 14, 1975

LEASE PRODUCTION HISTORY

DHSU # 27
SENW 33-140-97



LEASE [illegible]

AMOUNT

PER BBL

ACCUMULATED [illegible]

GROSS

PER ACRE

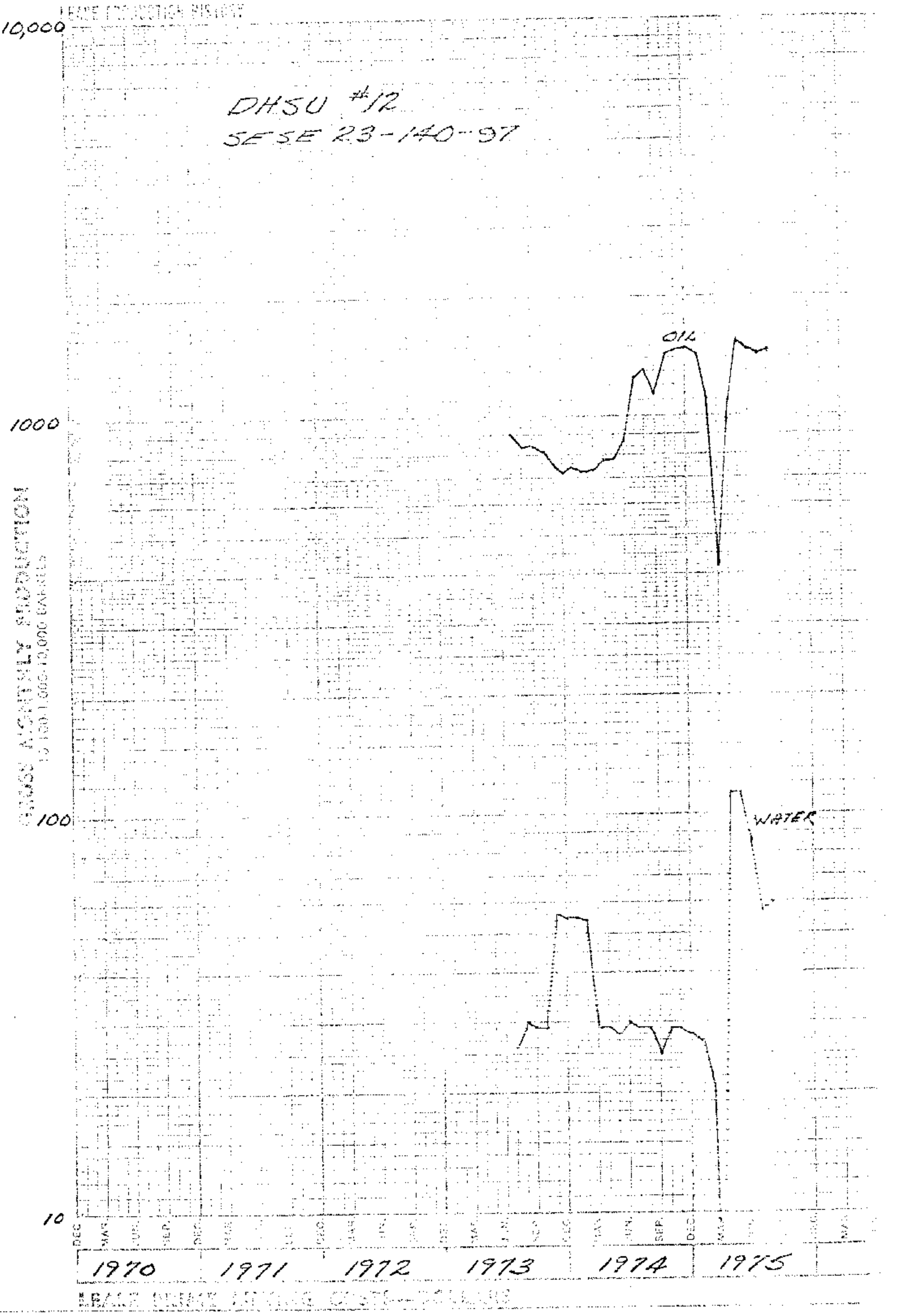
ESTIMATED OIL [illegible]

GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

PRODUCING WELLS



LEASE DIRECT LIFTING COSTS—DOLLARS

AMOUNT	
PER BBL.	

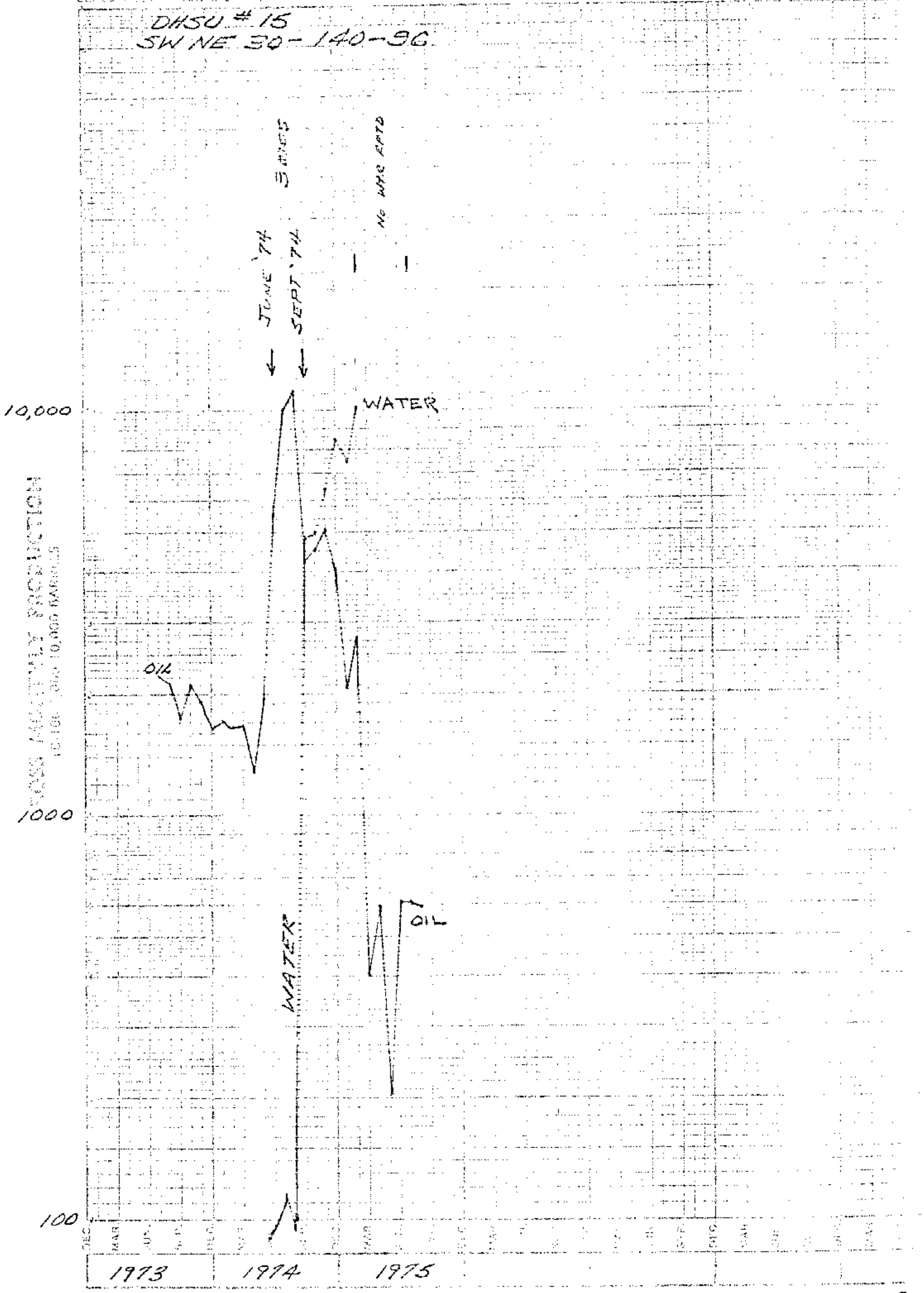
ACCUMULATED PRODUCTION—BARRELS

GROSS	
PER ACRE	

ESTIMATED OIL RESERVES—BARRELS—AS OF

GROSS FUTURE	
GROSS ULTIMATE	
NET FUTURE	

LEASE PRODUCTION HISTORY



AMOUNT

PER BBL

GROSS

PER ACRE

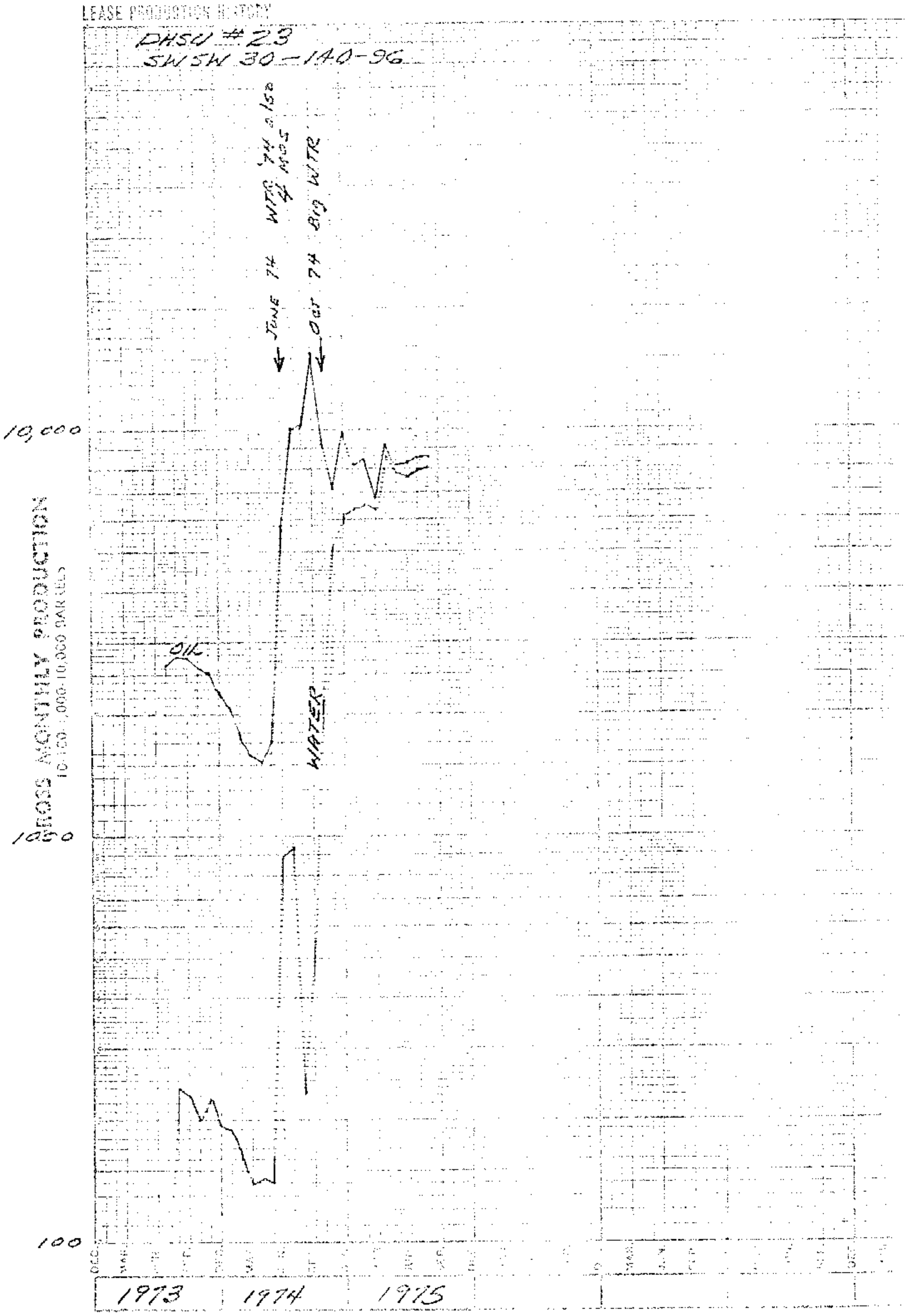
GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

LEASE PRODUCTION HISTORY

PRODUCING WELLS



LEASE [illegible]

AMOUNT

PER BBL.

ACCUMULATED [illegible]

GROSS

PER ACRE

ESTIMATED OIL [illegible]

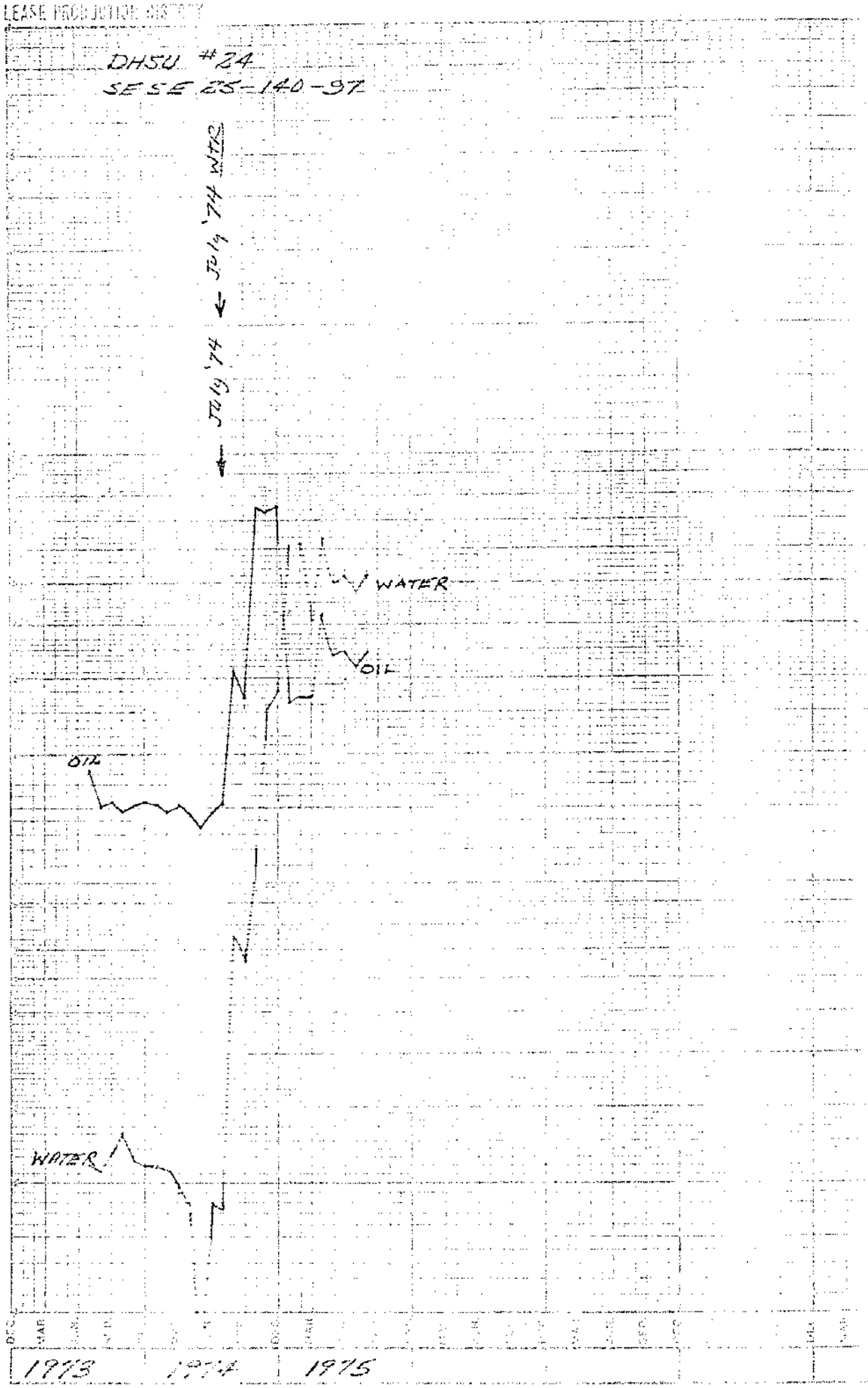
GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

PRODUCING WELLS

LEASE PRODUCTION HISTORY



LEASE TOTAL

AMOUNT

PER BBL

ACCUMULATED PRODUCTION TO DATE

GROSS

PER ACRE

ESTIMATED CAPACITY

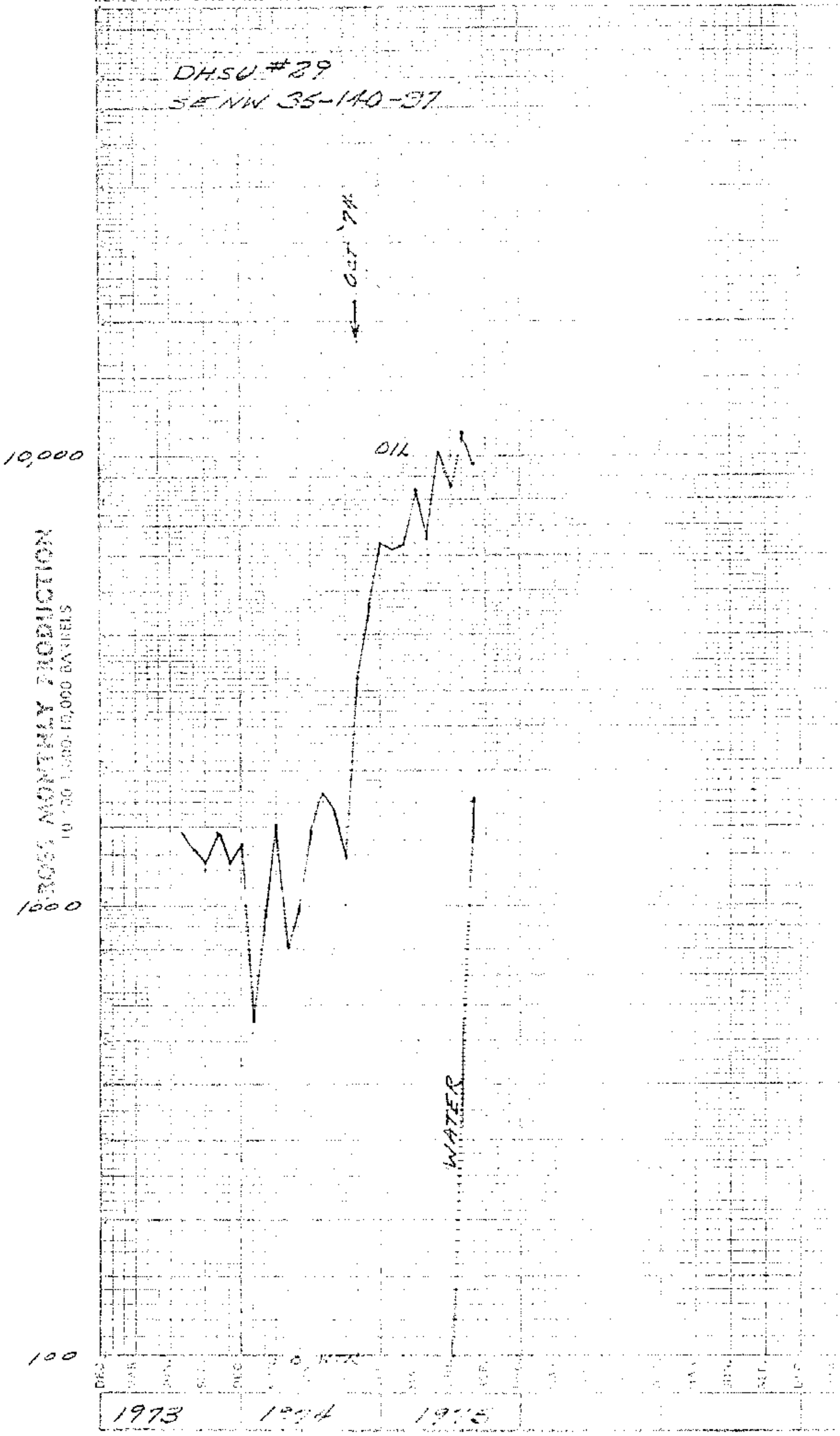
GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

LEASE PRODUCTION HISTORY

PRODUCING WELLS



AMOUNT

PER BBL

GROSS

PER ACRE

GROSS FUTURE

GROSS ULTIMATE

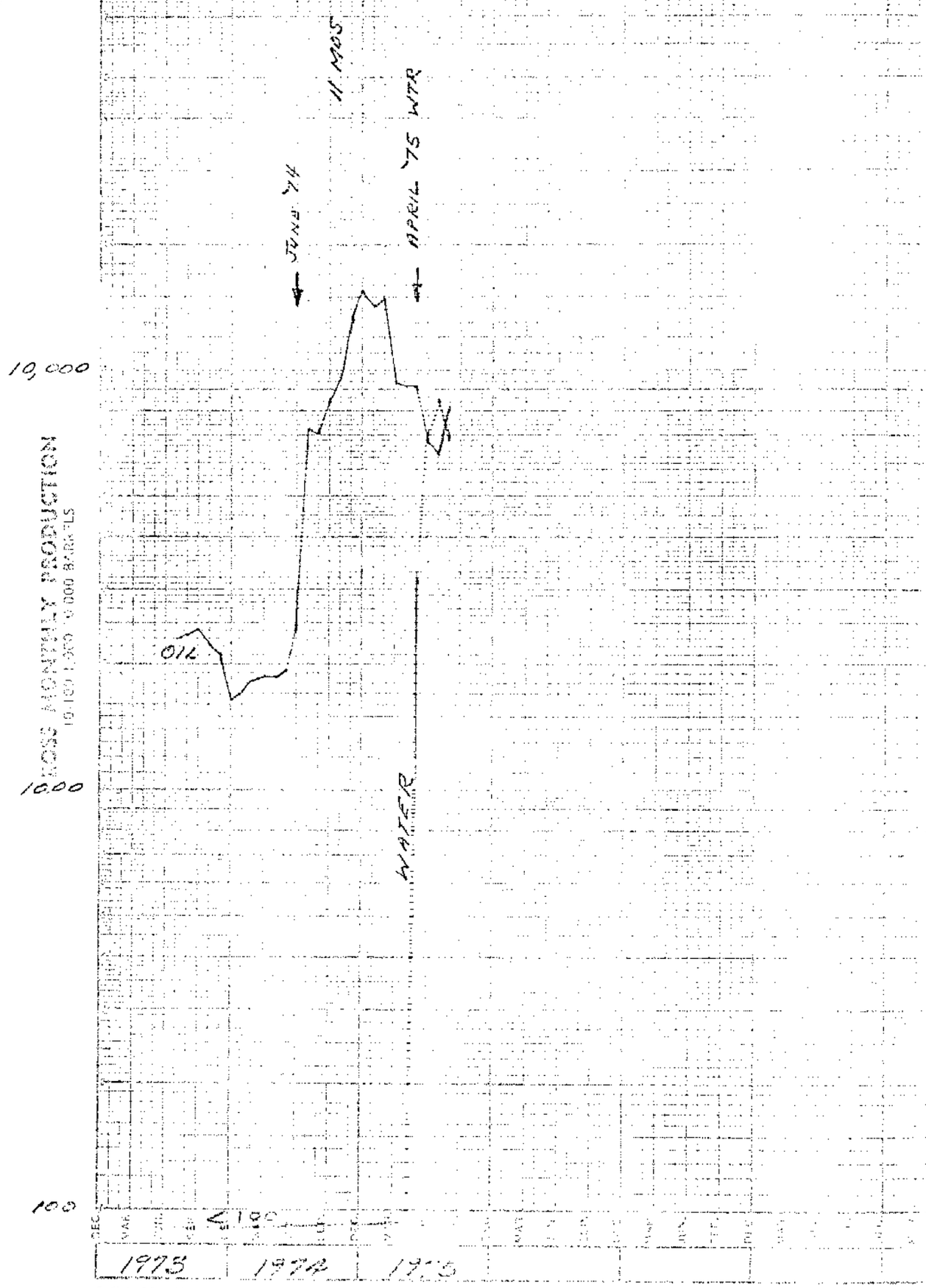
NET FUTURE

PRODUCING WELLS

LEASE PRODUCTION HISTORY

DHSU #38

C SW 36-140-97



LEASE PRODUCTION [illegible]

AMOUNT

PER BBL.

ACCUMULATIVE [illegible]

GROSS

PER ACRE

ESTIMATED OIL [illegible]

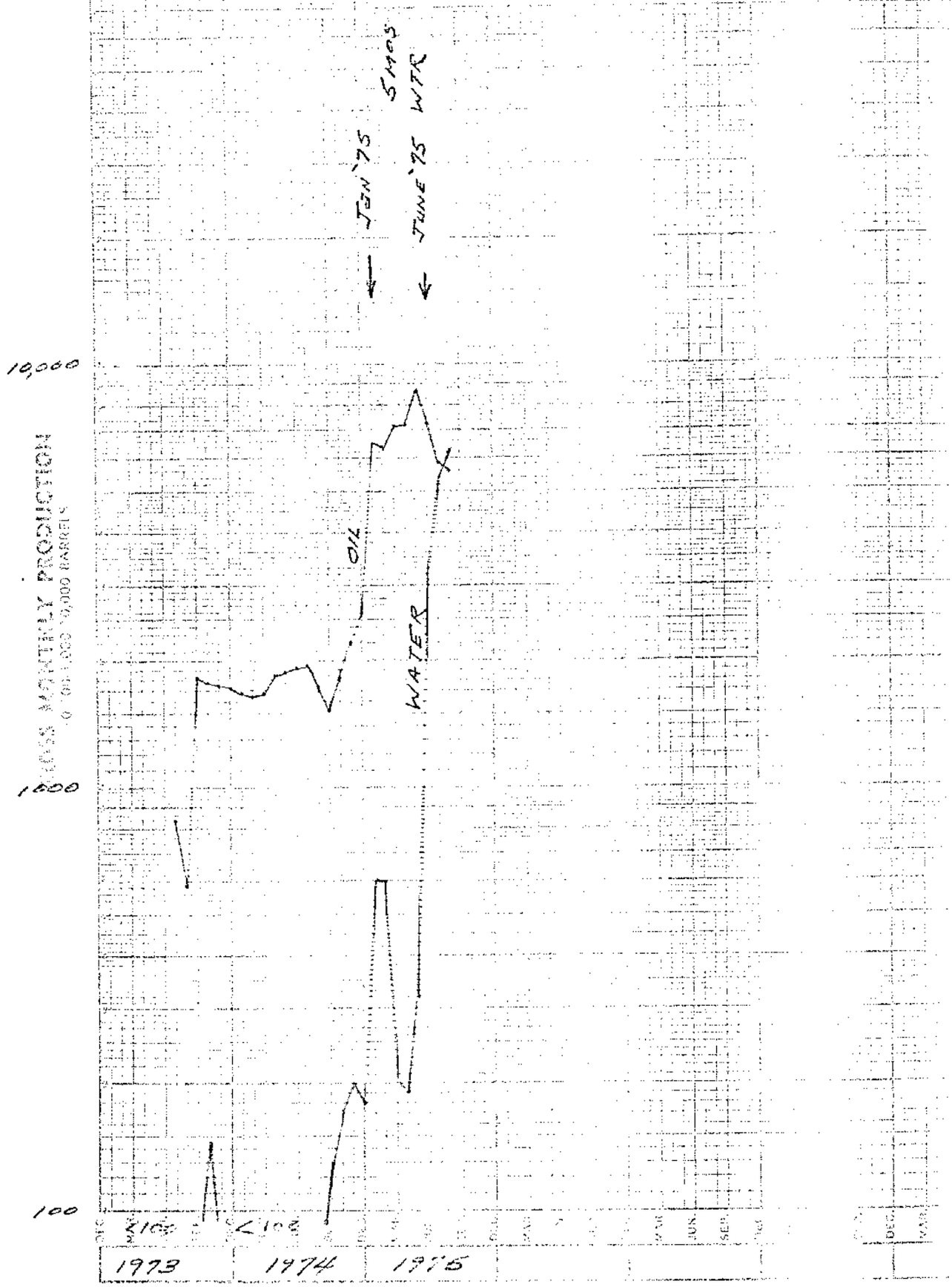
GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

LEASE PRODUCTION HISTORY

DASU #39
SESE 35-140-97



LEASE [illegible]

AMOUNT

PER BBL

ACCUMULATIVE PRODUCTION

GROSS

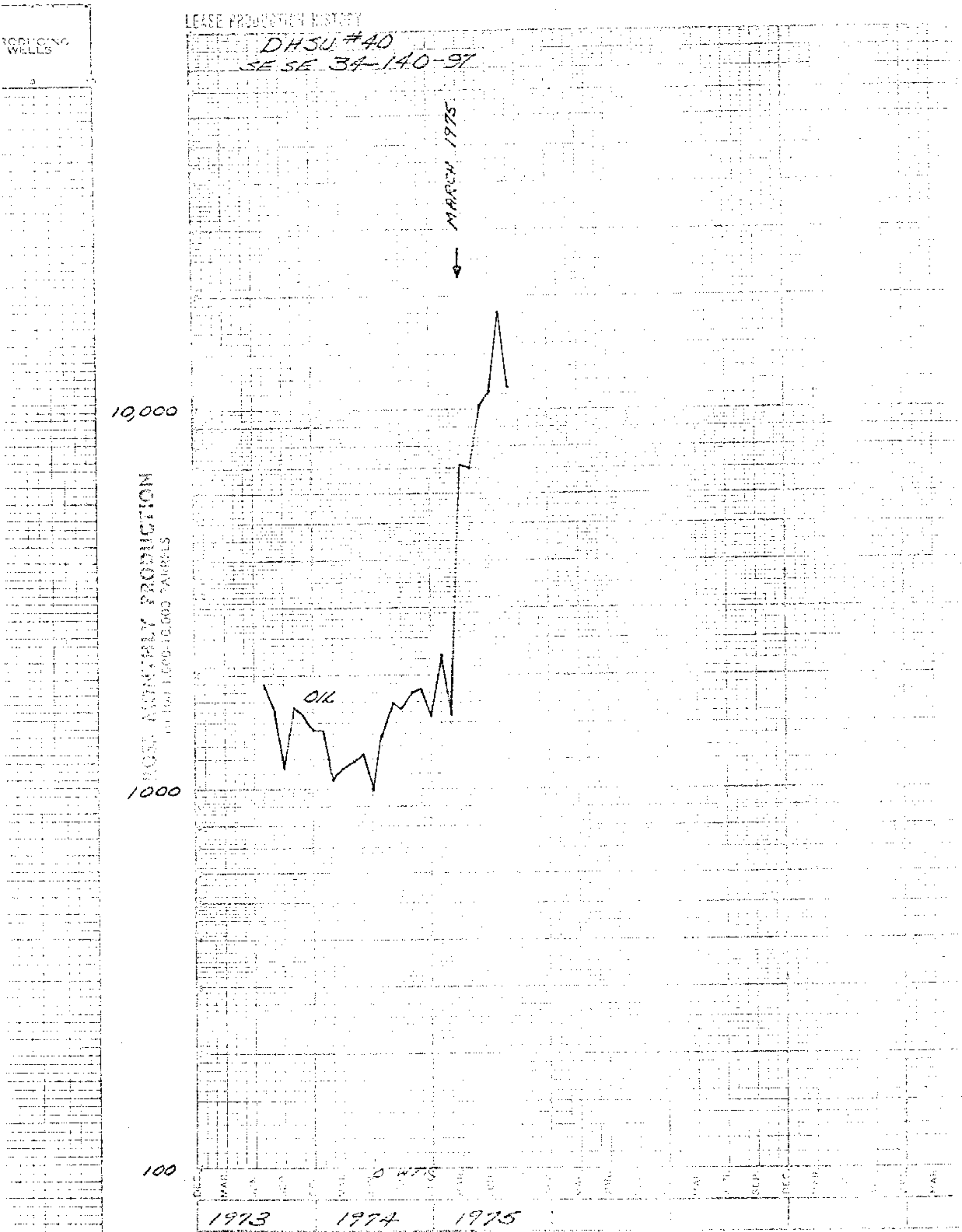
PER ACRE

ESTIMATED [illegible]

GROSS FUTURE

GROSS ULTIMATE

NET FUTURE



AMOUNT

PER BBL

GROSS

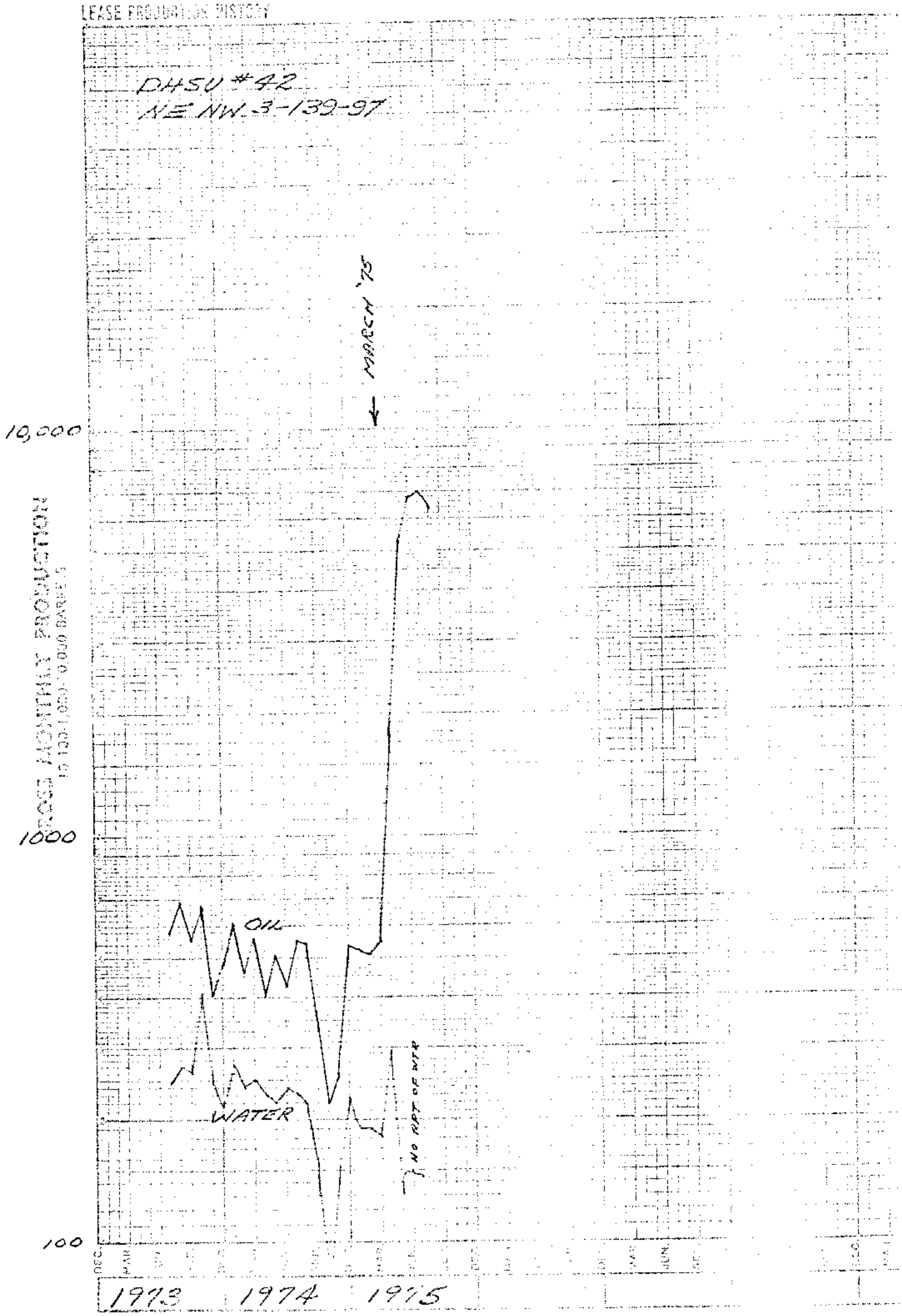
PER ACRE

GROSS FUTURE

GROSS ULTIMATE

PRODUCING WELLS

LEASE PRODUCTION HISTORY



AMOUNT

PER BBL.

ACCUMULAT...

GROSS

PER ACRE

ESTIMATED OIL ...

GROSS FUTURE

GROSS ULTIMATE

NET FUTURE

LAW OFFICES OF
FLECK, MATHER, STRUTZ & MAYER, LTD.
SUITE 200 PROFESSIONAL BUILDING
P. O. BOX 1436
BISMARCK, NORTH DAKOTA 58501

ERNEST R. FLECK
RUSSELL R. MATHER
WILLIAM A. STRUTZ
THOMAS A. MAYER
WARREN H. ALBRECHT, JR.

TELEPHONE
701-223-6585

1283

September 22, 1975

Mr. Gerald VandeWalle
First Assistant Attorney General
State Capitol Building
Bismarck, North Dakota 58505

Dear Mr. VandeWalle:

In re Continental Oil Company
Our File No. 11818

We enclose herewith Application for the above captioned company. We trust that the matter can be set for hearing before the Industrial Commission.

Very truly yours,

Ernest R. Fleck

ERNEST R. FLECK

bs

Enclosure

cc Dr. A. E. Noble w/Enclosure

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

IN THE MATTER OF THE APPLICATION OF CONTINENTAL OIL COMPANY FOR AN ORDER PERMITTING THE DRILLING OF CERTAIN INJECTION WELLS ALONG THE DICKINSON HEATH SAND UNIT BOUNDARY IN STARK COUNTY, NORTH DAKOTA.	)	A P P L I C A T I O N

****

COMES NOW the Applicant, Continental Oil Company, and respectfully alleges:

I.

That Continental Oil Company, a Delaware corporation, authorized to do business in the State of North Dakota, is the Unit Operator for the Dickinson Heath Sand Unit, Stark County, North Dakota.

II.

That Commission Order 1202 approved a statutory type Unit and established administrative procedures and special operating rules for the Dickinson Heath Sand Unit lands on March 13, 1973.

III.

That the unitized lands are being waterflooded successfully. The injected water increases the pressure in the reservoir sands and forces oil to move to low pressure points in the reservoir which are the producing wells.

IV.

That on the west end of the Unit the reservoir pressure has increased at Well No. 27 because of water injection. In time this increased pressure will force oil to migrate further to the west and off of the unitized lands.

V.

That the entire Heath Sand reservoir was not included in the Dickinson Heath Sand Unit as a result of lack of information. Present

FLECK, MATHER,
STRUTZ, MAYER, LTD.
BISMARCK, NORTH DAKOTA

information indicates the oil saturated Heath sands extended beyond the areas mapped by the Dickinson Heath Sand Unit Engineering Committee.

VI.

That Article I, Paragraph 1.7 of Part II of the Plan of Unitization for the Dickinson Heath Sand Unit and the stated and implied convenants of the underlying leases require the Unit Operator to protect the Unit Area from drainage by offset operators.

VII.

That because of the secondary recovery operations through waterflooding and the resulting increase in reservoir pressures, oil cannot migrate onto the unitized lands but, in fact, can only migrate off of unitized lands.

VIII.

That lands immediately outside the Dickinson Heath Sand Unit have been, or are, subject to Commission Orders 1218, 1224, 1260, 1262, 1264, 1301, 1302, and perhaps others.

IX.

That by Commission Order 1365, Continental Oil Company, the Unit Operator, was prevented from drilling a well inside the Unit boundary, as authorized by Order 1202, which well was located to protect the Unit from drainage by wells directly offsetting the Unit boundary.

X.

That subsequent to issuance of Commission Order 1365, two meetings between representatives of the Unit Operator and the working interest owners of leases to the west of the Unit were held in Denver on August 19 and September 10, 1975. At the meetings there were discussions concerning expansion of the Unit Area or methods of protecting the Unit Area from migration of oil from the unitized lands.

XI.

That at the two meetings of the working interest owners, information was exchanged on the reservoir volumes, reserves, current

rates of production and other items. The information exchanged indicated that by using the existing Dickinson Heath Sand Unit unitization formula, the lands outside the Unit Area might not receive their equitable share of Unit participation. Hence, an immediate Unit expansion to the west does not appear to be a solution to the current problem of oil migration.

XII.

At the second meeting it was tentatively agreed that two injection wells should be located along the north boundary of the Unit in Section 33, Township 140 North, Range 97 West. The wells would be located approximately 400 feet from the west line and 10 feet from the north line; and 3640 feet from the west line and 10 feet from the north line of Section 33, Township 140 North, Range 97 West. The two wells would effectively halt migration of oil from the Unit Area. They will be beneficial in recovering oil by waterflooding which would otherwise remain unrecoverable on the lands outside the Unit boundary.

XIII.

That the major working interest owners outside the western part of the Unit Area will consider forming a new Unit (South Hart Unit) to include the productive lands outside the Dickinson Heath Sand Unit Area and joining in the drilling of the above two injection wells. In return, Unit Operator will attempt to negotiate a lease line injection agreement, a water sales agreement for pressured water to be injected on other parts of South Hart Unit, and attempt to negotiate a produced water disposal agreement whereby the Dickinson Heath Sand Unit would dispose of produced South Hart Unit water. The above agreements will be dependent upon the approval of the working interest owners in the two areas.

XIV.

Wherefore, to avoid subsurface waste, and to maximize the efficient recovery of oil from the two producing areas, Continental Oil Company, as Unit Operator of the Dickinson Heath Sand Unit, respectfully requests that the North Dakota Industrial Commission

authorize the State Geologist to issue permits for two line injection wells at the approximate location stated above. The water injection rates into the two wells will be at rates agreed to by the Operators as conditions require, but initially will not exceed the combined production rates from wells presently located in Sections 27, 28, 32, and 33, Township 140 North, Range 97 West, Stark County, North Dakota.

Dated this 22nd day of September, 1975.

CONTINENTAL OIL COMPANY

FLECK, MATHER, STRUTZ & MAYER, Ltd.
Attorneys for the Applicant
Sutie 200, Professional Bldg.
P.O. Box 1436
Bismarck, ND 58501

STATE OF NORTH DAKOTA)
)ss
COUNTY OF BURLEIGH)

ERNEST R. FLECK, being first duly sworn on oath, deposes and says that he is the attorney for the Applicant herein named, that he has read the above and foregoing Application, knows the contents thereof and is within the knowledge of the affiant, and that the same is true to the best of his knowledge, information and belief.

ERNEST R. FLECK

Subscribed and sworn to before me this 22nd day of September, 1975.

Carol Solberg
Carol Solberg, Notary Public
Burleigh County, North Dakota
My Commission Expires: 6-25-81