

## dugan production corp.

## RECEIVED

DEC 1 1 1986

December 10, 1986

BUREAU OF LAND MANAGEMENT FARMINGTON RESOURCE AREA

Bureau of Land Management Caller Service 4104 Farmington, NM 87499

Attn: Mr. Ron Fellows

Re: Permission to Vent Casinghead Gas

Dugan Production Corp's

Bengal B No. 1

Federal Lease No. NM-16471

SW/4 SE/4 Section 2, T26N, R12W, NMPM

Gallegos Gallup Field San Juan County, NM

Dear Mr. Fellows:

We are writing to request permission to vent (for a temporary period of time) a relatively minor amount of casinghead gas, which is produced in association with oil production from the captioned well. Our request to vent casinghead gas is the result of current gas market conditions and the fact that El Paso Natural Gas Company's (EPNG's) Chaco Plant (which processes gas from the subject well) was shut down on October 31, 1986, and EPNG is unable to give us a date which they plan to resume operations at their Chaco Plant.

The Bengal B No. 1 was completed on July 16, 1973 from perforations in the Gallup formation 4840' - 4966'. As of November 1, 1986 we have produced 6411 BO. During the first 10 months of 1986, production averaged 4.3 BOPD + 18.9 MCFD, of which 3.5 MCFD was utilized for lease fuel and 15.4 MCFD was sold. The Bengal B No. 1 has a history of heavy paraffin deposition and during periods of shut-in, the rods and pump become stuck, requiring that the rods and tubing be pulled and the tubing be cleaned prior to returning the well to production. The road and location for the Bengal B No. 1 are very sandy, and thus, moving equipment in for remedial work is expensive, in addition to the expense of stripping the tubing and rods. Thus, during the shut-in of El Paso's Chaco Plant, rather than shutting-in the Bengal B No. 1, Dugan Production desires to continue producing the Bengal B No. 1 and vent the associated casinghead gas production in lieu of shutting-in the well and risking an expensive work-over prior to returning the well to production at some future date when EPNG resumes operations at their Chaco Plant.

(a: ADO Speraror NMOOD(A) 3/62.7-3 Letter to BLM - Attn. Mr. Ron Fellows December 10, 1986 Bengal B No. 1 Page 2

Your favorable consideration of our request to vent gas will allow not only a continued revenue flow for Dugan Production, but also to the state and federal government in the form of production taxes and royalty. Again, we are requesting permission to vent gas only while El Paso's Chaco Plant is inoperative (or we secure some other market), and upon El Paso's returning their plant to operation, we would resume the sale of casinghead gas from this well.

Should you have any questions regarding this matter, please feel free to contact Barbara Williams or me.

Sincerely,

John D. Roe

Petroleum Engineer

John D. Roe

JDR/cg

APPROVED

El Stelle

EMADEA MANAGER