

STATE OF NEW MEXICO ENERGY AND WINERALS DEPARTMENT OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE

GARREY CARRUTHERS GOVERNOR

1000 RIO BRAZOS ROAD AZTEC, NEW MEXICO 87410 (505) 334-6178

Date:
Oil Conservation Division P.O. Box 2088 Santa Fe, NM 87504-2088
Re: Proposed MC Proposed DHC Proposed NSL Proposed SWD Proposed WFX Proposed PMX
Gentlemen:
I have examined the application dated 7/3/83
for the Union Soyn Vet In Com And Val 19 220 Operator Lease & Well No.
Operator Lease & Well No.
$\frac{f-13.78 N-1100}{\text{Unit, S-T-R}}$ and my recommendations are as follows:
- Oppore
Yours truly,



January 30, 1989

Mr. Frank Chavez District Supervisor N. M. Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410 DECEIVE D

OIL CON. DIV.

DIST. 3

Re: Proposed Commingling
Angel Peak B #22E
Section 13, T28N-R11W
San Juan County, NM
Basin Dakota and Armenta Gallup

Dear Frank,

A rig will be moved on this well and the two zone commingled as soon as approval is received. We recommend production allocation as follows:

Gas: Gallup 42%

Dakota 58%

Oil: Gallup 50%

Dakota 50%

This allocation is based on recent production of approximately 18 MCFD and a trace of oil from the Gallup, and an estimated 25 MCFD and a trace of oil from the Dakota when line pressure drops. Historical decline curves also suggest the same allocation percentages.

If there are any questions, please contact me.

Yours truly,

Stergie Katirgis Production Engineer

cc: W. K. Cooper

S. J. Hunter

B. A. Norman

Union Texas Petroleum

Wellfile

January 29, 1989

Mr. W. J. LeMay New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501-2088

Re: Angel Peak B #22E (SF 046017-A) 1750' FNL & 1650' FWL Section 13, T28N-R11W San Juan County, New Mexico JUL 0 3 1989

OIL CON. DIV.

Dear Mr. LeMay:

Union Texas Petroleum is applying for a downhole commingling order for the referenced well in the Basin Dakota/Armenta Gallup fields. Ownership of the two zones to be commingled is common. The Bureau of Land Management and the offset operators indicted in the attached plats will receive notification of this proposed downhole commingling.

The subject well was drilled during December 1982 and completed during March 1983 in the Dakota and Gallup formations. The Dakota formation was fracture stimulated with 87,000# 20/40 sand in 135,417 gallons water and nitrogen. The Gallup formation was fracture stimulated with 303,500# 20/40 sand in 231,000 gallons nitrogen foam in three stages. CAOF of the Dakota zone (4/20/83) was 371 MCFD. Initial production test of the Gallup formation (5/3/83) was 145 MCFD and 10 BOPD. The Gallup zone is currently produced with a plunger lift system, and the Dakota is produced from below a packer. Two tubing strings are utilized. Most recent production from the Gallup formation is 18 MCFD and a trace of oil. The Dakota is not capable of sustained production due to high line pressure, but will produce 25 MCFD at lower line pressure.

This is a very marginal well which can no longer be produced economically. It is proposed to remove the Gallup tubing and Dakota packer and produce both zones using one tubing string only. The proposed commingling will result in recovery of additional hydrocarbons from both the Gallup and Dakota formation, thereby preventing waste, and will not violate correlative rights. Commingling of the two zones will result in a more efficient operation by helping to lift the very small amount of produced liquids from each zone. The Dakota will now be produced into the low pressure Union Texas Petroleum operated gathering system, and the plunger left system currently used to produce the Gallup zone will be eliminated.

The attached fluid analysis is from the Gallup and Dakota zones of the Angel Peak B #24E, an offset well in the same section approximately half mile to the southeast. The Gallup and Dakota zones were similarly commingled in this wellbore during October 1986, per Administrative Order No. DHC-602. Also, similarly commingled during May 1989, as per Administrative Order No. DHC-703, is the Congress Lachman #4E, one mile to the east of the subject well. The trace amounts of liquids produced in the subject well will be similar to these two offsets. The analysis indicates the total value of crude will not be reduced by the commingling. The reservoir characteristics of each zone are such that underground waste would not be caused by the proposed downhole commingling. The calculated static bottom hole pressure, based on surface pressure and fluid measurements, is 310 psi in the Gallup and 430 psi in the Dakota in the Congress Lachman #4E; 238 psi in the Gallup and 472 psi in the Dakota in the Angel Peak B #24E; within the limits of Rule 303-C, Section 1(b), Part (6). small amount of liquids from each zone are compatible and no precipitates will be formed as a result of commingling to damage either reservoir. Current flow tests indicate the daily liquid production will not exceed the limit of Rule 303-C, Section 1(a), parts (1) and (3).

The Division Aztec District Office will be notified any time the commingled well is shut-in for seven consecutive days. To allocate the commingled production to each zone, historical production curves and current production volumes have been reviewed and submitted. See attached.

Included with this letter are two plats showing ownership of offsetting leases, a production curve of each zone, Form C-116 (GOR test), a Fluid Analysis Report, and a wellbore diagram showing the proposed downhole configuration after commingling.

Sincerely,

S. G. Katirgiš

Production Engineer

S. D. Katizis

attachments

NEW MEXICO OIL CONSERVATION COMMISSION GAS-OIL RATIO TESTS

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1 . . .

Union Texas Petroleum Corp.	Corp.		Pent	Arme	Armenta	Gallup/Basin		Dakota		a n	Juan	1			
ay 64	Farmington,	I	Σ	87401		7.Y	TYPE OF TEST - (X)		Sette Tablest []	•	mortal, a 13	- Junion		3.	., c : :! [X]
14 24 44 44 44 44	WELL	_	LOC	LOCATION		DATEOF	CHOKE	E TBG	DAILY	12617	40	PROD. DURING	IRING T	EST	GAS - 011
JEC 11011	O Z	כ	s	1	œ		SIZE	uL.	ALLOW- ABLE	1637	WATER BBLS.	GRAV.	01L BBL S.	GAS M.C.F.	RATIO CU.FT.BE
Angel Peak B (Gallup)	22E	14.	13	28N	1 1 N	2/22/89	-	9/		24	0		<u> </u>	22	N/A
Angel Peak B (Dakota)	22E	LL.	13	28N	11W	2/22/89		220		24	0	·	· —	25	N/A
No well will be analigned an allowable greater than the amount of oil produced on the official teat. During gan-oil ratio teat, each well shall be produced at a rate not exceeding the two rate clients.	able greate	er than se produ	the amou	int of oll	l produce	d on the official test.	: B t.				I here	by certi	ify that	the above	I hereby certify that the above information

During gas-oil ratio test, each well shall be produced at a rate not exceeding the top unit allowable for the pool in which well ta located by more than 25 percent. Operator to encouraged to take advantage of this 25 percent tolerance in order that well can be assigned No well will be assigned an allowable greater than the amount of oil produced on the official test, increased allowables when authorized by the Commission,

is true and complete to the best of my know-

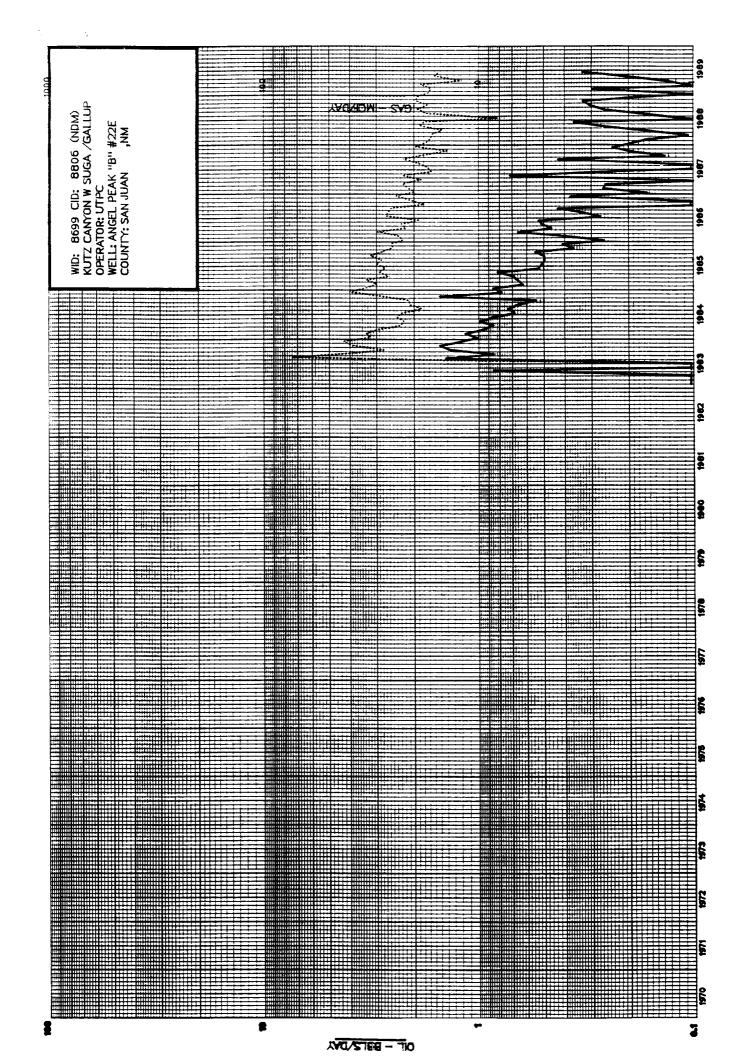
ledge and belief.

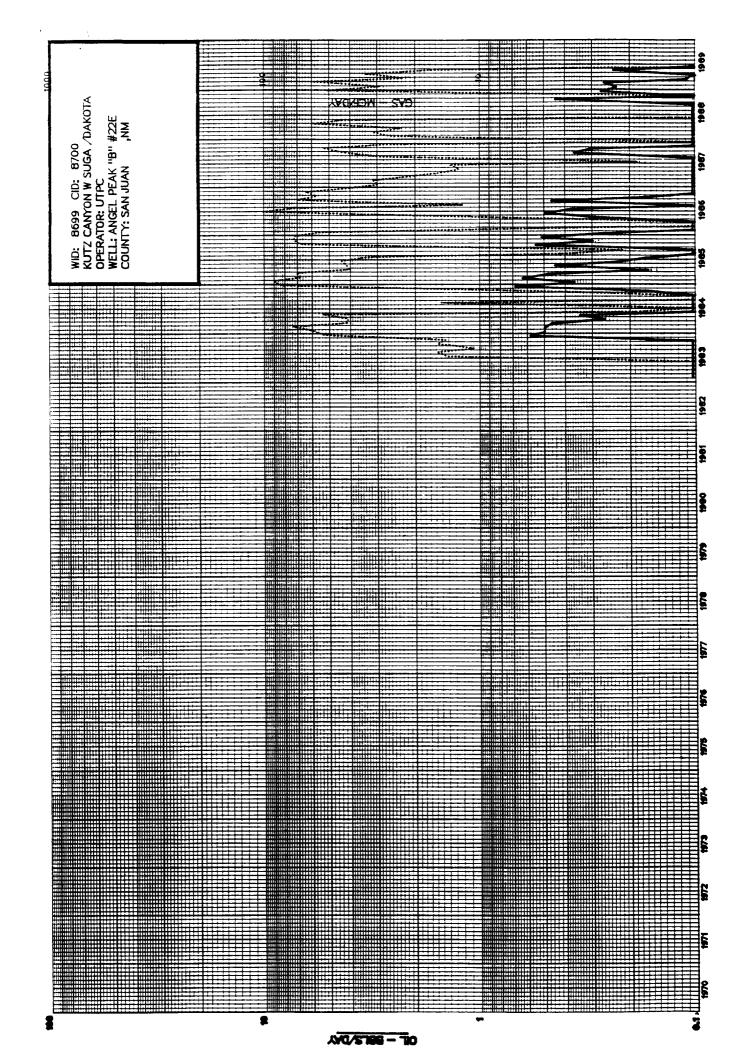
Gas volumes must be reported in MCF measured at a pressure base of 15.025 pale and a temperature of 60° F. Specific gravity buse *111 b. 0.00.

Report casing pressure in lieu of tubing pressure for any well producing through casing.

Mail original and one copy of this report to the district office of the New Mexico Oil Conservation Commission in accordance with Nule 101 and appropriate pool rules.

Production Engineer





Union Texas Petroleum

SUBJECT: ANGEL PEAK B #22E

EXISTING Wellbore Diagram

BY: SGK DATE: 6/30/89

PAGE_____ OF ____

		and the second of the second o
121/4" hole 95/8", 40#, K-55@328' circ cmt to surface		1750 FNL \$ 1650 FWL Sec. 13, 728N - RIIW T28N-RIIW San Juan County, NM
		- 238", 4.7 *,8rd, EVE@ 5870' - 238",4,7 *,8rd, EVE @ 6310'
DV tools @ 4438'		Gallup 5435'-6064'
	X X	7" Madel D pkr@ 6207'
3/4" hole ",23", K-55@6630' arc cmt to surface 3rd stage		Dakota 6300'-6418'

TD = 6640'

Union Texas Petroleum

SUBJECT: ANGEL PEAK B #22E

Proposed Wellbore Diagram

BY: SGK DATE: 6/30/89

PAGE OF

1750 FNL & 1650 FNL Sec. 13, 728N-RIIN T28N-RIIN San Juan County, NM 121/4" hole 95/4" csg @ 328' circ cmf to surface ** 2%", 4,7 , 8 rd, EVE @ 6400' DV tools @ 4438' 1996' Gallup 5435'-6064' Dakota 6300'-6418' 83/4" hole 7" csg@ 6633'
circ cmt to surface 3rd
stage

PBTD = 6550'

UNION TEXAS PETROLEUM ANGEL PEAK B24E LEASE FLUIDS

LABORATORY INVESTIGATION

OF

ANGEL PEAK GALLUP AND DAKOTA FLUIDS COMPATABILITY

JANUARY 22, 1986

PREPARED FOR:

UNION TEXAS PETROLEUM Sterg Katirgis Petroleum Engineer PREPARED BY:

PRODUCTION ANALYSTS

SUMMARY OF RESULTS

- 1. No precipitation of materials was observed from either admixture of fluids.
- 2. Emulsion testing was performed. There is no concern over emulsion effects.
- 3. The cloud point of oil mixtures dropped or remained the same upon mixing of fluids.
- 4. According to calculations not enough cool down from gas expansion will occur to alter paraffin deposition significantly.

JAMES C. TERRY PRODUCTION ANALYSTS

Farmington, New Mexico

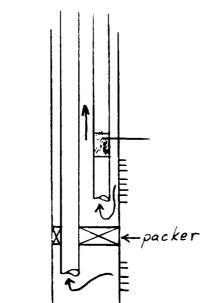
On Monday, January 13, 1986, a request for laboratory work was place by Sterg Katirgis, Petroleum Engineer of Union Texas Petroleum Corporation.

PURPOSE

Two oil samples were received of Mr. Katirgis with the request we investtigate the concern of potentially detrimental effects due to comingling of Gallup and Dakota fluids in the Angel Peak B24E.

INVESTIGATION

1. Background Information - Current Wellbore a)



Existing Gallup Perforations

Existing Dakota Perforations

- b) BHST Gradient: 1.375° F/100 ft. depth.
- c) Current production problems are primarily due to paraffin deposition from surface down to ≈ 1000 ' depth.

LABORATORY INVESTIGATION ANGEL PEAK B24E LEASE FLUIDS

d) Commingling Order Mixture Requirements:

The commingling requests present the mixing of Angel Peak B24E Dakota oil with Angel Peak B24E Gallup fluids (oil/water).

The tests performed simulated the mixture of fluids that may result from this commingling action. Each oil component was analyzed for API gravity, paraffin, pour point, and cloud point. Each water component was analyzed for dissolved solids, pH, specific gravity and resistivity. The mixture of oils addressed the potential increase in precipitation of materials and the potential increase in paraffin content by a synergistic effect of mixing oils of different constitution. Emulsion tests simulated the mixing environment of the wellbore where the water component of a fluid could by tied up in a resulting emulsion without the ability to break out and allow separation of the oil and water constituents. The emulsion test results present the number of ml (% of mixture) of water breakout at listed time intervals. The volume of test sample (mixture) used in the emulsion tests is 100 ml.

- 2. Concerns to address in analysis.
 - a) The precipitation of materials produced by the admixture of oils of potentially different constitution.
 - b) The creation of emulsions due to the admixture of different fluids.
 - c) Increased paraffin deposition by additive properties of oils.
 - d) Increased paraffin deposition due to the reduction of temperature accompanying gas expansion.
- 3. Steps taken in analysis
 - a) API Analysis of oils including: API Gravity
 Pour Point
 Cloud Point
 Paraffin Content
 B S & W
 - b) Discussion with Mr. Katirgis regarding the well bore production environment; e.g., mode of hydrocarbon production, pump type and operation, water components of production fluids, current paraffin problems, etc.
 - c) Mixing of oils in appropriate cases with additional cloud point testing to determine resulting fluid characteristics.
 - d) API Water Analysis
 - e) Emulsion tendency testing via mixing of fluids in appropriate cases.

LABORATORY INVESTIGATION ANGEL PEAK B24E

LEASE FLUIDS

DATA

Sample #1

Zone: Dakota API Gravity @ 60°F 53.0 22°F Cloud Point -1°F Pour Point 7.98% (weight)

Pafaffin Content

Sample #2

Gallup Zone: API Gravity @ 60°F 44.1 2°F Cloud Point <-12°F Pour Point Paraffin Content 14.19% (weight)

Sample #3

50/50 Mix Zone: API Gravity @ 60° F 48.9 24°F Cloud Point <-10°F Pour Point Paraffin Content 11.89% (weight)

Analysis	No	1
Date	1-22-86	

PRODUCTION ANALYSTS

Oil Analysis

Operator Union Texas Petroleum	Date Sampled	1-10-86
Well Angel Peak B24E	Date Received	1-13-86
Field	Submitted By	Sterg Katirgis
Formation Dakota	Worked By	Clay Terry
Depth	Sample Description	n Brownish, clear oil
County San Juan	sample. No water	phase or emulsion.
State New Mexico	Small bottom soli	ds component.
API Gravity 53.0 ° at 60°F	SAMPLE COMPO	OSITION:
Paraffin Content 7.98 % by weight	н,0	0
Asphaltene Content n/a 7 by weight	Emulsion	0 .
Pour Point1 °F	Oil	780
Cloud Point 22 °F	Total	780 ml
Comments:		
B S & W Test Results:		
Oil 99.9 Water 0 Solids <0.1 Emulsion 0	~ 0.0	· 12
	Analyst	y Um

Analysis	No.		2		
Date	1-22-	-86			

PRODUCTION ANALYSTS

Oil Analysis

Operator Union Texas Petroleum	Date	e Sampled 1	-10-86
Well Angel Peak B24E	Date	Received 1	-13-86
Field -	Subi	nitted By	Sterg Katirgis
Formation Gallup	Worl	ked By	Clay Terry
Depth -	Sam	ple Descript	ion <u>Oil/Water/Emulsion</u> sample
County San Juan	<u>0il</u>	phase is ye	llowish-brown, opaque.
State New Mexico	Emu	lsion phase	not serious.
API Gravity 44.1 ° at 60°F		Sample Comp	osition:
Paraffin Content 14.19 % by weight	;	н ₂ 0	103
Asphaltene Content N/A % by weigh	it	Emulsion	16
Pour Point <-12 °F		<u>0i1</u>	807
Cloud Point 2 °F		Total	926ml
Comments:			
B S & W Test Results: 011 95.5%			
Water 0.8% Solids <0.1% Emulsion 3.7%			
•	A	lvet	O) a Has

Analy	sis No	•3	
Date	1-22-	86	

PRODUCTION ANALYSTS

Oil Analysis

Operator Union Texas Petroleum	Date Sampled 1-10-86
Well Angel Peak B24E	Date Received 1-13-86
Field	Submitted By Sterg Katirgis
Formation <u>Gallup/Dakota</u>	Worked By Clay Terry
Depth	Sample Description 50/50 mix of oils from
County San Juan	Gallup and Dakota intervals.
State New Mexico	
API Gravity 48.9 ° at 60°F	
Paraffin Content 11.89% by weight	
Asphaltene Contentn/a_% by weight	t
Pour Point <-10 °F	
Cloud Point 24 °F	
Comments:	
B S & W Test Results:	
0il 96.0% Water 0.4% Solids <0.1% Emulsion 3.6%	
	Analysis (b) or 1/204

REMARKS & RECOMMENDATIONS:

API WATER ANALYSIS REPORT FORM

Company Union Texas Petrole	um		Sample No.	Date Sampled
Field Angel Peak Gal/Dak	Legal Description		County or E San Juan	i i
Lease or Unit Angel Peak B	Well 24E	Depth -	Formation Gallup	Water, B/D H ₂ 0
Type of Water (Produced, S Produced	uppiy, etc.) Sampling Separa			Sampled By SK

			Separator		_
DISSOLVED SOLIDS				OTHER PROPERTIES	
CATIONS	mg/l	me/l		pH _	6.3
Sodium, Na (cale.)	_218	9.5		Specific Gravity, 60/60 F.	1.003
Calcium. Ca	-0-	-0-	•	Resistivity (ohm-meters) 75 F.	000
Magnesium, Mg	29			Total Hardness	120
Barium, Ba					
Potassium, K	180	4.6			
ANIONS			•	WATER PATTERNS - ma/l	
Chloride. Cl	383	10.8		STANDARD	
Sulfate. SO ₄	25	05		20 10 0 10	20
Carbonate, COa				Martinianianianianianianianiania	Turn _{C1}
Bicarbonate, HCO:	319	5.2		Ca ++++ +++ +++ +++ +++ ++ ++ ++ ++ ++ ++	
Hydroxide. OH	0_				1 1 1
	-			M od 1181 1181 1882 1882 1884	111111111111111111111111111111111111111
				e e la company de la compa	ماسساري
				LOSARITHMIC	
Total Dissolved Solids				Menulier Lander & Lander Control of Allian Listania Listania	1 tilimi er
	1154				+ HIIII HCO,
Iron. Fe (total)	0				1 11 11 504
Sulfide. as H2S	0			Folimber Judier Judier Judier II in Judie in Judier in Judier	ممسسم
				00001	000
				<u> </u>	<u> </u>

Fig. 1 EMULSION TESTS DATA SHEET

OFFICIOR: UNION TEXAS SUBMITTED BY: S. KATIRGIS

TYPE & CONC. OF FLUID: 50/50 MIX OF - GALLUP/DAKOTA FLUIDS

WELL: ANGEL PEAK B24E SOURCE OF SAMPLE:

TYPE & CONC. OF SOLIDS:

FIFLD: Angel Peak Gal/B DATE SAMPLED: 1-10-86 FORMATION: Gallup/Dakota DATE RECEIVED: 1-13-86

TEST TEMPERATURE: 75°F

arrin: Unknown

API CRAVITY OF OIL: 48.9

FLUID RATIO:

50/50

county: San Juan

ANALYSIS BY:

C. Terry

PERCENTAGE OF ORIGINAL Had SEPARATED AT VARIOUS TIME INTERVALS AFTER EMULSIFYING

Test Number	1			*												
•••				•									:			
Impred Time	Time	Vol	Time	Vol	Time	Vol	Time	Vp1	Time	Vol	Time	Vol	Time	Vol	Time	Vol
l min	1	4	ž		3		4	'	5		6		7		8	
2	2	6	3		4		5		6		7		8		9	
3	3	7	4		5		6		7		8		9		10	
4	4	7	5		6		7		8		9		10		11	
5	5	7	6		7		8		9		10		11		12	
6	6	7	7		8		9		10		11	•.	12		13	
7	7	7	8		9		10		11		12		13		14	
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ý	9	7	13		11		12		13	4	14		15		16	
10	10	7	11		12		13		14		15		16		17	<u> </u>
:0	20	7	21		22		23		24		25		26		27	
.:0	30	7	31		32		33		34		35		36		37	
oral Vol (ml)		100														ļ
Col. Trailsion / Studge		0														
\$51 #45 *														 	J	ļ
Interface**											<u> </u>				<u> </u>	
OIL		93												<u> </u>		

* Preferential vetting of solids: OB=oil-wet bottom; OO=oil-wet oil phase; Whater-wet bottom; WO=water-wet oil phase
Ol=oil-wet interface; WI=water-wet interface
Interface: F=Fluid: S=Solid: V=Viscous

** Interface: F=Fluid; S=Solid; V=Viscous

**The mixture of fluids was constructed to reflect proper proportions of the various fluids within each sample. Therefore, the mix was 50 ml Dakota oil, 43 ml Gallup oil, 6 ml Gallup H₂0, 1 ml Gallup Emulsion

LABORATORY INVESTIGATION ANGEL PEAK B24E LEASE FLUIDS

CALCULATIONS

Cool down effects due to gas expansion:

Reference: Perry's Handbook of Chemical Engineering

RE: Adiabatic Expansion of Ethane, Methane

$$T_s = T_r \begin{pmatrix} P \\ (-s) \\ P_r \end{pmatrix} \qquad (\frac{K-1}{K})$$
, where

 $T_s = Surface Temperature$

 $T_r = Reservoir Temperature$

P_s = Surface Pressure

P_r = Reservoir Pressure

K = Specific heat at constant pressure
Specific heat at constant volume

Assumed values for maximum cool down due to gas expansion:

$$T_r = 160^{\circ} F$$

$$P_s = 500 \text{ psi}$$

$$P_{r} = 2000 \text{ psi}$$

$$K = 1.2$$

$$T_s = 160 \left(\frac{500}{2000}\right)^{0.1667}$$

$$T_s = 127^{\circ} F$$

NOTE:

A total cooldown of 33°F would be expected

R-11-W

R-10-W

12 W 888888888888888888888888888888888888					N 00 F	1-20-IN I. CORP.			LAND PLAT-DAKOTA FORMATION	WELLYAME	FIRST PRODUCTION DATE (YEAR-MONTH-DAY)	88 AVG. OIL(BOPD)/BAS(MCFOPD) (STATUS) Cum Oil(MBO)/Bas(MMCFU)— Through 8/30/85	60000000000000000000000000000000000000
12 W			******	AMOCO	O 892/€;	CROWN CENTRAL PET	KUTZ EEDERAL #10				NEW AND SERVICE OF SER		C WEST
MII.	ELATE A COL # 5 - 2 1 10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	STATE COUNTY 520E	MESA PET.	(a) (b) (b) (c) (c) (c) (d) (d) (d) (d) (d) (d) (d) (d) (d) (d	ANY SASSESSION OF THE PROPERTY	O VICAC.	*******	e execute	SCOCCOCCOCCOCCCCCCCCCCCCCCCCCCCCCCCCCC	O WHAT	MERIDIAN	(BI)	
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80000000000000000000000000000000000000	22) MARINE S	CONJUNE 47	20000000000000000000000000000000000000	800000	***************************************	{						u	



January 30, 1989

Mr. Charles W. Gleeson Vice President - Production Damson Oil Corporation P. O. Box 4391 Houston, TX 77210

Gentlemen:

Union Texas Petroleum Corporation is in the process of applying for a downhole commingling order for our Angel Peak B #22E well located 1750' FNL & 1650' FWL, Section 13, T28N-R11W, NMPM, San Juan County, New Mexico, in the Armenta Gallup and Basin Dakota.

This is to notify you of such action as our records indicate you are owner and operator of acreage which adjoins the area in which the downhole commingling is requested. If you have no objections to the proposed downhole commingling order, we would appreciate your signing the attached copy of this letter and returning it to our office.

Your prompt attention to this matter would be appreciated.

Sincerely,

S. G. Katirgis

Production Engineer

The above downhole commingling request is hereby approved:

Date		



January 30, 1989

Meridian Oil Corporation Attn: Land Department P. O. Box 4289 Farmington, NM 87401

Gentlemen:

Union Texas Petroleum Corporation is in the process of applying for a downhole commingling order for our Angel Peak B #22E well located 1750' FNL & 1650' FWL, Section 13, T28N-R11W, NMPM, San Juan County, New Mexico, in the Armenta Gallup and Basin Dakota.

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Sincerely,

S. G. Katirgis
Production Engineer

The above downhole commingling request is hereby approved:

Date



January 30, 1989

Crown Central Petroleum Corp. Attn: Land Department 4747 Bellaire Boulevard Bellaire, TX 77401

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Sincerely,

S. G. Katirgis

S. G. Katerys

Production Engineer

The above downhole commingling request is hereby approved:

Date		



January 30, 1989

Amoco Production Company Attn: Land Department 2325 East 30th Farmington, NM 87401

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Your prompt attention to this matter would be appreciated.

Sincerely,

S. G. Katingis
Production Engineer

The above downhole commingling request is hereby approved:

Date		



January 30, 1989

Mesa Limited Partnership Attn: Land Department P. O. Box 579 Flora Vista, NM 87415

Gentlemen:

Union Texas Petroleum Corporation is in the process of applying for a downhole commingling order for our Angel Peak B #22E well located 1750' FNL & 1650' FWL, Section 13, T28N-R11W, NMPM, San Juan County, New Mexico, in the Armenta Gallup and Basin Dakota.

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Sincerely,

S. G. Katirgis Production Engineer

S. G. Katingio

The above downhole commingling request is hereby approved:

Date



January 30, 1989

Marathon Oil Company Attn: Land Department P. O. Box 1439 Farmington, NM 87401

Gentlemen:

Union Texas Petroleum Corporation is in the process of applying for a downhole commingling order for our Angel Peak B #22E well located 1750' FNL & 1650' FWL, Section 13, T28N-R11W, NMPM, San Juan County, New Mexico, in the Armenta Gallup and Basin Dakota.

This is to notify you of such action as our records indicate you are owner and operator of acreage which adjoins the area in which the downhole commingling is requested. If you have no objections to the proposed downhole commingling order, we would appreciate your signing the attached copy of this letter and returning it to our office.

Your prompt attention to this matter would be appreciated.

Sincerely,

S. G. Katirgis Production Engineer

The above downhole commingling request is hereby approved:

Date