OIL CONSERV ON DIVISION RECE VED

BARBARA FASKEN

FASKEN OIL AND RANCH INTERESTS

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303 WEST WALL AVENUE, SUITE 1900 MIDLAND, TEXAS 79701-5116 (915) 687-1777

February 22, 1991

New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87504-2088

Attn: David R. Catanach

Re: Request for Exception to Rule 303-A Barbara Fasken Feil Federal No. 1 660' FNL & 660' FWL Section 28, T-20-S, R-25-E Cemetery (Morrow) & Undes. (Atoka) Fields

Eddy County, New Mexico

Gentlemen:

Barbara Fasken respectfully requests exception to Rule 303-A to allow downhole commingling of Atoka and Morrow production from the subject well. This well will only produce some 45 mcfpd from both Atoka and Morrow perforations combined and is in the final stages of depletion. Without commingling, neither of these zones are economical to produce and would have to be plugged and abandoned.

The Morrow zone is perforated at 9384-96', 9431-33', 9436-38', 9458-61', 9470-74', 9494'-9504', 9514-24', 9527-32'. Atoka perforations are at 9155-61', 9263-66', 9270-75', 9292-94', 9311-15', 9329-32', 9341'-9345'. This well was originally completed in the Morrow in 1975. In December, 1990 the Atoka zone was perforated and produced only 50 mcfpd. The Morrow zone was producing 25 mcfpd at the time the Atoka was perforated and has a shut in bottom hole pressure of approximately 860 psi. Cross-flow should not occur between the Morrow and Atoka zones due to the low producing wellhead pressure of only 80-100 psi. Both the Atoka and Morrow zones produce only dry gas with no measurable liquid production.

The allocation of production for the commingled zones would include 33.3% attributed to the Morrow zone and 66.7% attributed to the Atoka zone. factors represent the current production tests for each zone as mentioned earlier.

The three offset operators - Chevron U.S.A., Inc., Southern Union Exploration, Inc., and Exxon Company U.S.A., as well as the Bureau of Land Management have each been mailed a copy of this request for downhole commingling. Please call me at 915-687-1777 should you have any questions concerning this request.

Yours truly,

FASKEN OIL AND RANCH INTERESTS

£mmy Da∀is, Jr.

Drilling and Operations

JWD:sb

cc:Well File Read File JWD

Southern Union Exploration Company 1201 Elm Street, Suite 1800 Dallas, Texas 75270-2090

Chevron U.S.A., Inc. P.O. Box 1150 Midland, Texas 79702

Exxon Company, U.S.A. P.O. Box 1600 Midland, Texas 79702

Bureau of Land Management P.O. Box 1778 Carlsbad, New Mexico 88220

N.M.O.C.D. Attn: Darrell Moore P.O. Drawer DD Artesia, NM 88210

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NEW MEXICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

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