

DATE IN

SUSPENSE

ENGINEER

LOGGED IN

TYPE

APP NO.

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] TYPE OF APPLICATION - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Simultaneous Dedication
☐ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement
☒ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] Other: Specify _____

[2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or ☐ Does Not Apply

[A] ☐ Working, Royalty or Overriding Royalty Interest Owners

[B] ☐ Offset Operators, Leaseholders or Surface Owner

[C] ☐ Application is One Which Requires Published Legal Notice

[D] ☐ Notification and/or Concurrent Approval by BLM or SLO
 U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

[E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ☐ Waivers are Attached

[3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] CERTIFICATION: I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name

Signature

Title

Date

e-mail Address



CERTIFIED MAIL 7003 0500 0003 9295 2704

June 30, 2005

Mr. William Jones
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

**RE: Application for Administrative Approval
Downhole Commingling
Gallegos Gallup & Basin Dakota Pools
Blackrock D No. 1R
Section 20, T26N, R11W
San Juan County, New Mexico**

2005 JUL 5 PM 1 29

Dear Mr. Jones:

Merrion Oil & Gas (Merrion) requests administrative approval for downhole commingling of the Gallegos Gallup and the Basin Dakota in the subject wellbore. The following information is provided in support of this application.

I. History and Justification

The Blackrock D No. 1R APD was approved May 18, 2005. It is a replacement well for the Blackrock D No. 1 that was Plugged in March 2005. We had planned to add the Gallup in that wellbore, but we had problems with a casing repair and abandoned the wellbore.

II. Proposed Spacing Units

Exhibit 1 is the C-102 plat for the Gallegos Gallup Pool with a 320 acre spacing unit in the west half of Section 20. Exhibit 2 is the C-102 plat for the Basin Dakota Pool with a 320 acre spacing unit in the west half of Section 20 as well. The Gallegos Gallup is an associated pool and will be considered a gas well with 320 acre spacing until it is tested and the GOR is determined.

III. Allocation Methodology

Exhibit 3 is the decline curve for the Dakota production in the Blackrock D No. 1. Exhibit 4 is the decline curve for the Blackrock C No. 1. It shows the Dakota initially, then the Gallup and Dakota commingled. In the Blackrock D No. 1R, we project that the Dakota will initially produce about 60 MCFD with little or no oil, and the Gallup will produce about 400 MCFD and 8 BOPD

Merrion proposes to obtain stabilized production tests on each zone separately and use a fixed percentage to allocate future production to each zones. If subsequent data indicate the need, additional testing may be done in the future to adjust the allocation percentages.

IV. Reservoir Fluid Compatibility

Water analyses are not available for wells in the immediate area. However, the waters of the Gallegos Gallup and the Basin Dakota have been generally determined to be compatible across the basin based on other similar applications to the NMOCD.

V. Cross Flow Between Zones

The reservoir pressure of the Dakota is anticipated to be about 1700 psi. The Gallup pressure should be somewhat lower at about 1500 psi. Crossflow should not be a problem with this small pressure differential. If crossflow should occur during a shut in period, the Dakota gas would not harm the Gallup formation, and would quickly be recovered upon returning the well to production.

VI. Well Ownership Notification

The ownership of both zones is identical, so no notification is necessary.

VII. Summary

Projected reserves for either of the zones would be marginal in the economic justification of the project. Commingling the zones will maximize reserves and protect correlative rights. Therefore, we request your approval of this application.

If you have questions or need additional information, please call me at 505.324.5326.

Sincerely,

A handwritten signature in black ink, appearing to read 'Connie S. Dinning', with a stylized, flowing script.

Connie S. Dinning
Production Engineer

Cc: Steve Hayden, Aztec NMOCD
BLM, Farmington Field Office

District I
1625 N. French Dr., Hobbs, NM 88240

District II
1301 W. Grand Avenue, Artesia, NM 88210

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-102
Revised June 10, 2003
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-045-32217	² Pool Code 26980	³ Pool Name Gallegos Gallup
⁴ Property Code	⁵ Property Name Blackrock D	⁶ Well Number 1R
⁷ OGRID No. 14634	⁸ Operator Name Merrion Oil & Gas	⁹ Elevation 6158'

¹⁰ Surface Location

UL or lot no. D	Section 20	Township 26N	Range 11W	Lot Idn nwnw	Feet from the 835'	North/South line north	Feet from the 1235'	East/West line west	County San Juan
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¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Dedicated Acres 320 Ac	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.						

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

¹⁶ 				¹⁷ OPERATOR CERTIFICATION <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</i> Signature Connie S. Dinning Printed Name Production Engineer/cdinning@merrion.bz Title and E-mail Address June 29, 2005 Date
	SF-078899	SF-078899A		
SF-078899A	SF-078899			¹⁸ SURVEYOR CERTIFICATION <i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i> Date of Survey Signature and Seal of Professional Surveyor: Certificate Number

District I
1625 N. French Dr., Hobbs, NM 88240

District II
1301 W. Grand Avenue, Artesia, NM 88210

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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Santa Fe, NM 87505

Form C-102
Revised June 10, 2003
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-045-32217		² Pool Code 71599		³ Pool Name Basin Dakota	
⁴ Property Code		⁵ Property Name Blackrock D			⁶ Well Number 1R
⁷ OGRID No. 14634		⁸ Operator Name Merrion Oil & Gas			⁹ Elevation 6158'

¹⁰ Surface Location

UL or lot no. D	Section 20	Township 26N	Range 11W	Lot Idn nwnw	Feet from the 835'	North/South line north	Feet from the 1235'	East/West line west	County San Juan
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¹¹ Bottom Hole Location If Different From Surface

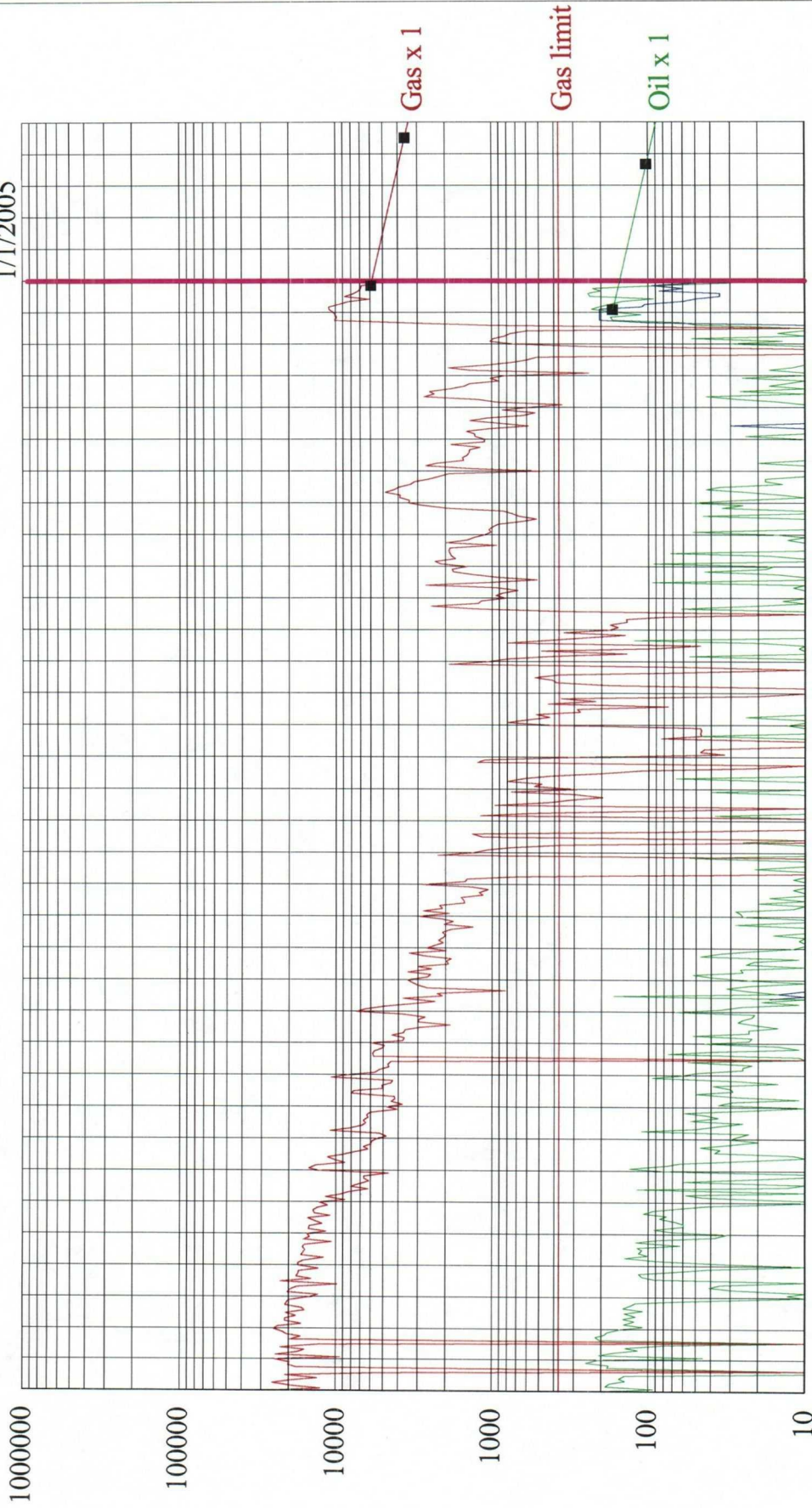
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Dedicated Acres 320 Ac		¹³ Joint or Infill		¹⁴ Consolidation Code		¹⁵ Order No.			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

¹⁶ 				¹⁷ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Signature Connie S. Dinning Printed Name Production Engineer/cdinning@merrion.bz Title and E-mail Address June 29, 2005 Date	
SF-078899	SF-078899A				
SF-078899A	SF-078899				¹⁸ SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. Date of Survey Signature and Seal of Professional Surveyor: Certificate Number

Blackrock C1 (1 - 100%), DK/GLP

Effective Date
1/1/2005



7071 7273 7475 7677 7879 8081 8283 8485 8687 8889 9091 9293 9495 9697 9899 0001 0203 0405 0607 0809 10

2300430450578071599
Blackrock C1 (1 - 100%)
OLD
DK/GLP
San Juan, NM

[0]
Basin
21 26N 11W

Cumulative:
Remaining:
Ultimate:

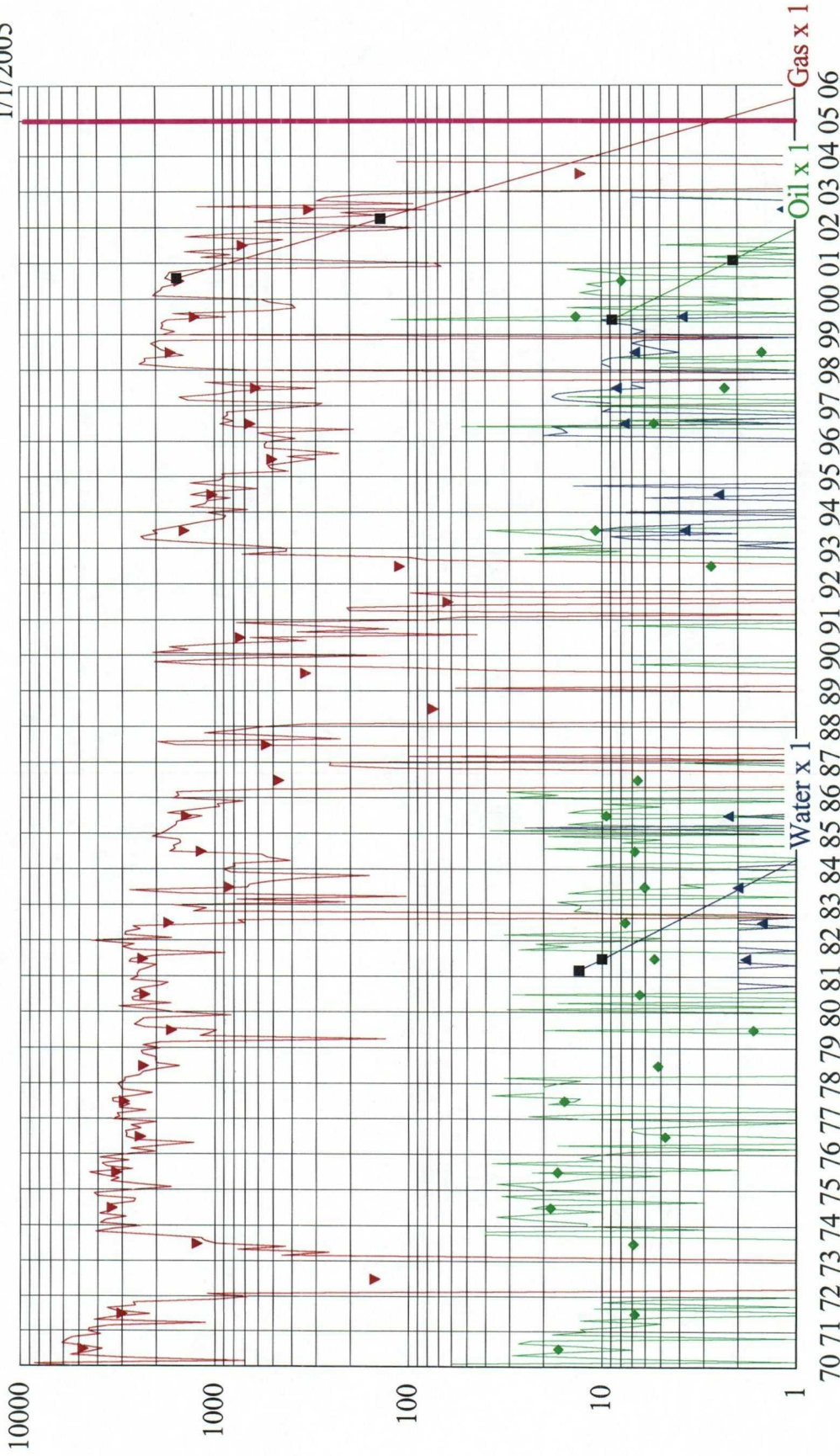
Oil (bbl)
41,632
15,683
57,315

Gas (mcf)
4,375,716
603,918
4,979,634

Water (bbl)
1,996
480
2,476

Blackrock D1 (1 - 100%), Basin DK

Effective Date
1/1/2005



25104526N11W20C00DK
Blackrock D1 (1 - 100%)
OILD
Basin DK
San Juan, NM

[3455776]
Basin DK
20C 26N 11W

Cumulative:
Remaining:
Ultimate:

Oil (bbl)
15,343
0

Gas (mcf)
2,316,873
0

Water (bbl)
518
0
518

**SUPPORTING DATA FOR C-103
BLACKROCK D NO. 1R COMMINGLE
BASIN DAKOTA (71599) AND GALLEGOS GALLUP (26980)**

This supplemental information is attached to the C-103 to commingle the subject well in the Basin Dakota and Gallegos Gallup pools.

1. The Basin Dakota and Gallegos Gallup have been pre-approved for commingling by Order No. R-11363.
2. The well is a new drill through the Dakota. Proposed Dakota perfs are from 5850' – 5950', at various depths. Proposed Gallup perfs are from 4910' – 5200', at various depths. We plan to complete both zones and downhole commingle the two intervals pursuant to the attached procedure.
3. In offset wells, the depleted Dakota is making approximately 30 MCFD as shown on the attached production plot for the Blackrock D1 (P&A). We assume that since the Dakota is depleted in this area that the production will be about 60 MCFD with no oil. We had attempted to complete the Gallup in the Blackrock D1 and lost the wellbore. The nearest Gallup production is from the Blackrock C1. It is making about 270 MCFD and about 3.5 BOPD. We will complete a production test on the Dakota prior to the Gallup completion. A constant percentage will be used to allocate production between the zones after the initial test.
4. The commingling will increase, not reduce, the value of the remaining production because the economics of drilling a well based on either formation alone would be marginal.
5. Ownership of the Dakota and Gallup are identical.
6. A copy of this application will be sent to the Bureau of Land Management attached to a sundry notice.

Submit 3 Copies To Appropriate District
Office
District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Ave., Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources

Form C-103
May 27, 2004

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

WELL API NO. 30-045-32217
5. Indicate Type of Lease Federal STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No. NA
7. Lease Name or Unit Agreement Name Blackrock D
8. Well Number 1R
9. OGRID Number 14634
10. Pool name or Wildcat Basin Dakota/Gallegos Gallup

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	
1. Type of Well: Oil Well <input type="checkbox"/> Gas Well <input checked="" type="checkbox"/> Other	
2. Name of Operator Merrion Oil & Gas	
3. Address of Operator 610 Reilly Ave, Farmington, NM 87401	
4. Well Location Unit Letter <u>D</u> : <u>835</u> feet from the <u>north</u> line and <u>1235</u> feet from the <u>west</u> line Section <u>20</u> Township <u>26N</u> Range <u>11W</u> NMPM County <u>San Juan</u>	
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 6158' GL	
Pit or Below-grade Tank Application <input type="checkbox"/> or Closure <input type="checkbox"/>	
Pit type _____ Depth to Groundwater _____ Distance from nearest fresh water well _____ Distance from nearest surface water _____	
Pit Liner Thickness: _____ mil Below-Grade Tank: Volume _____ bbls; Construction Material _____	

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input checked="" type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Merrion Oil & Gas proposes to complete the subject well in the Basin Dakota and the Gallegos Gallup and downhole commingle the production according to the attached procedure. Please note that the procedure is fairly general, as the well has not been drilled. Supporting commingling data is also attached.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that any pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐ or an (attached) alternative OCD-approved plan ☐.

SIGNATURE [Signature] TITLE Production Engineer DATE 6/27/05

Type or print name Connie S. Dinning E-mail address: cdinning@merrion.bz Telephone No. (505)324-5326
For State Use Only

APPROVED BY: _____ TITLE _____ DATE _____
Conditions of Approval (if any): _____

MERRION OIL & GAS CORPORATION

COMPLETION PROCEDURE (TO BE FINALIZED AFTER DRILLING)

June 30, 2005

Well:	Blackrock D1R	Field:	Gallegos Gallup/B Dakota
Location:	835' fnl & 1235' fwl (nw nw) Sec 20, T26N, R11W, NMPM San Juan County, New Mexico	Elevation:	6171' RKB 6158' GL
By:	Connie Dinning	Lease:	SF-078899
		AFE No.:	20515

Procedure: (Note: This procedure will be adjusted on site based upon actual conditions)

Prior to move-in

1. Clean up location, install tubing head.

Drill out

1. Move in, rig up pulling unit with reverse equipment.
2. Set rental water storage/ test tank.
3. PU & tally casing scraper, 6 1/4" bit, 2 3/8" tubing in hole.
4. RIH, clean out to liner top @ 4000' KB. Drill out cement if necessary.
5. Continue clean out to float collar @ ±6060' w/ 3 7/8" bit.
6. RU acid truck. Load hole, pressure test casing to 4000 psig for 15 minutes
7. Roll hole w/ 5 bbl gel plug and clean 2% KCl water.
8. Spot 100 gal 15% Hcl acid w/ inhibitor, iron sequestering agent and de-emulsifying surfactant from 5850' KB to ~ 5990' KB. Pull up hole and swab fluid level to liner top at 4000'.

Perf & Frac Dakota

1. RU wireline. Run GR-Correlation log from PBTD @ 6060' to top of Gallup @ 4910' or minimum run depth, whichever is greater.
2. Perforate Dakota w/ .34" holes, total 20 shots, per Compensated Neutron Log as follows:

5850' – 5990'	? spf	20 holes	To be determined
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3. MIRU stimulation company. RIH w/ RCP on 2 3/8" tubing. Set RCP @ ±5800'. Break down and ball off w/ 500 gal 15% HCl w/ inhibitor, iron sequestering agent and de-emulsifying surfactant and 30 ball sealers.
4. Run WL junk basket to recover ball sealers.
5. Unload hole w/ N₂ in preparation for frac.
6. Frac the Dakota w/ 70Q N₂ foam w/ low residue 20# crosslink gelled fluid and 100,000# 20/40 Ottawa sand at 30 BPM as per frac schedule.
7. RD frac company, open well to flowback tank. Flow back overnight.

Put on to Production:

1. RIH w/ 2 3/8" tubing and CO w/ hydrostatic bailer if necessary. Run 2 3/8" production tubing w/ SN on bottom to ~6150'KB.
2. ND BOPs. NUWH.
3. Flow test well 48 hrs. to establish Dakota production for commingling allocation.

Perf & Frac Gallup:

1. MIRU pulling unit. TOH w/ 2 3/8" tbg.
2. RIH w/ RCP and RBP on 2 3/8" tubing, set RBP @ ±5800' and RCP @ ± 5850'. Dump 5' sand on top of RBP.

3. Load hole w/ 2% KCl and pressure test to 4000 psi. Release RCP, pull up and swab fluid level down to $\pm 3200'$.
4. TOH w/ tbg and RCP.
5. Perforate Gallup w/ .34" holes, 1 spf, total 26? shots, per Compensated Neutron Log as follows:

5103', 5107', 5120', 5125', 5133', 5161', 5214' **Example, to be determined**

6. THI w/ RCP on tbg and set @ $\pm 4850'$.
7. MIRU stimulation company. Break down and ball off w/ 500 gal 15% HCl w/ inhibitor, iron sequestering agent and de-emulsifying surfactant and ball sealers.
8. TOH w/ RCP.
9. Run WL junk basket to recover ball sealers.
10. Frac the Gallup w/ 70Q N₂ foam w/ low residue 20# crosslink gelled fluid and 20/40 Brady sand as per frac schedule.
11. RD frac company, open well to flowback tank. Flow back overnight

Put on to Production:

1. RIH w/ 2 3/8" tubing and CO to RBP @ 6000'.
2. RIH w/ retrieving head and latch onto RBP. TOH, LD RBP.
3. Run 2 3/8" production tubing w/ SN, PS and MA to $\pm 6000'$ KB. Check for fill, and CO to PBTD @ 6060'.
4. RIH w/ 1 1/4" insert pump and rods
5. RDMOL. Put well on to production and report daily.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0137
Expires March 31, 2007

SUNDRY NOTICES AND REPORTS ON WELLS
*Do not use this form for proposals to drill or to re-enter an
abandoned well. Use Form 3160-3 (APD) for such proposals.*

SUBMIT IN TRIPLICATE – Other Instructions on reverse side.

1. Type of Well

☐ Oil Well ☒ Gas Well ☐ Other _____

2. Name of Operator

Merrion Oil & Gas Corporation

3a. Address

610 Reilly Avenue, Farmington, NM 87401

3b. Phone No. (include area code)

505.324.5300

4b. Location of Well (Footage, Sec. T., R., M., or Survey Description)

880' fml & 1235' fwl

Sec 20, T26N, R12W

5. Lease Serial No.

SF-78899

6. If Indian, Allottee or Tribe Name

7. If Unit or CA/Agreement, Name and/or No.

8. Well Name and No.

Blackrock D No. 1R

9. API Well No.

30-045-32217

10. Field and Pool, or Exploratory Area

Gallegos Gallup/Basin Dakota

11. County or Parish, State

San Juan

12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Report	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug & Abandon	<input type="checkbox"/> Temporarily Abandon	<u>Downhole Commingle</u>
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation (clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleat horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports shall be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompleat in a new interval, a Form 3160-4 shall be filed once testing has been completed. Final Abandonment Notices shall be filed only after all requirements, including reclamation, have been completed, and the operator has determined that the site is ready for final inspection.)

Merrion Oil and Gas proposes to downhole commingle production from the Gallegos Gallup and the Basin Dakota formations in the subject wellbore as per the attached general procedure. The well has not yet been drilled, so the the exact completion details are not available at the present time. A state downhole commingling application is attached.

14. I hereby certify that the foregoing is true and correct
Name (Printed/Typed)

Connie S. Dinning

Title **Production Engineer**

Signature

Date **June 30, 2005**

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved by

Title

Date

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office

Title 18 USC Section 1001 and Title 43 USC Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.