

DHC 6/30/99
2382



POGO PRODUCING COMPANY

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 4, 1999

New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
Attention: Mr. David R. Catanach

JUN 10 1999
U.S. MAIL
POST OFFICE BOX 10340
MIDLAND, TEXAS 79702-7340

RE: Southeast Red Tank Prospect
Lea County, New Mexico
Application for Administrative Approval
for Downhole Commingling in the
Covington "A" Federal No. 13 Well
located 2310' FSL and 1980' FEL
Section 25, T-22-S, R-32-E
Federal Oil and Gas Lease NM NM2379
Pogo Lease L12

Gentlemen:

Pogo Producing Company respectfully submits Form C-107 (in duplicate), along with attachments thereto, in connection with Pogo's request for Administrative approval to downhole commingle production from the captioned well.

If you have any questions, please give me a call at (915) 685-8120.

Sincerely,

POGO PRODUCING COMPANY


Terry Gant
Division Landman

Enclosure

cc: New Mexico Oil Conservation Division (w/copy of enclosure)
Attn: District Supervisor
P.O. Box 1980
Hobbs, NM 88240

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107-A.
New 3-12-96.

DISTRICT II
811 South First St., Artesia, NM 88210-2835

OIL CONSERVATION DIVISION

APPROVAL PROCESS:

2040 S. Pacheco
Santa Fe, New Mexico 87505-6429

Administrative Hearing

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410-1693

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE.

YES NO.

Pogo Producing Company P.O. Box 10340 Midland, TX 79702-7340

Operator Covington A Federal 13 Address J, Sec 25, T-22-S, R-32-E Lea

Lease Well No. Unit Ltr. - Sec - Twp - Rge County

OGRID NO. 17891 Property Code 9316 API NO. 30-025-33142 Spacing Unit Lease Types: (check 1 or more) Federal X State (and/or) Fee

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	RED TANK: DELAWARE WEST 51689		RED TANK: BONE SPRING 51683
2. Top and Bottom of Pay Section (Perforations)	8366' - 8566'		8838' - 8861'
3. Type of production (Oil or Gas)	OIL		OIL
4. Method of Production (Flowing or Artificial Lift)	ARTIFICIAL LIFT		ARTIFICIAL LIFT
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	a. (Current) 300 psi Producing (estimated)		a. 1000 psi SI (estimated)
	b. (Original) 3218 psi SI	b.	b. 3637 psi SI
6. Oil Gravity (API) or Gas BTU Content	40.8		41.8
7. Producing or Shut-In? Production Marginal? (yes or no) * If Shut-In, give date and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data * If Producing, give date and oil/gas/water rates of recent test (within 60 days)	PRODUCING NO		SHUT IN YES
	Date: 5-23-99 Rates: 49 BO, 175 BW, 37 MCF	Date: Rates:	Date: 2-10-99 Rates: 6 BO, 0 BW, 88 MCF
	Date: Rates:	Date: Rates:	Date: Rates:
8. Fixed Percentage Allocation Formula - % for each zone (total of %'s to equal 100%)	Oil: 89% Gas: 30%	Oil: % Gas: %	Oil: 11% Gas: 70%

9. If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data.

10. Are all working, overriding, and royalty interests identical in all commingled zones? Yes No
If not, have all working, overriding, and royalty interests been notified by certified mail? Yes No
Have all offset operators been given written notice of the proposed downhole commingling? Yes No

11. Will cross-flow occur? Yes No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. Yes No (If No, attach explanation)

12. Are all produced fluids from all commingled zones compatible with each other? Yes No

13. Will the value of production be decreased by commingling? Yes No (If Yes, attach explanation)

14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. Yes No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). _____

16. ATTACHMENTS:

- * C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
- * Production curve for each zone for at least one year. (If not available, attach explanation.)
- * For zones with no production history, estimated production rates and supporting data.
- * Data to support allocation method or formula.
- * Notification list of all offset operators.
- * Notification list of working, overriding, and royalty interests for uncommon interest cases.
- * Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE: Ron D. Gasser TITLE: Div. Petr. Engr. Mgr. DATE: 6-4-99
TYPE OR PRINT NAME: Ron D. Gasser TELEPHONE NO. (915) 685-8100

DISTRICT I
P.O. Box 1980, Hobbs, NM 88240

DISTRICT II
P.O. Drawer DD, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Artec, NM 87410

DISTRICT IV
PO BOX 2088, SANTA FE, NM 87504-2088

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
Instruction on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-33142	Pool Code 51689	Pool Name West Red Tank Delaware
Property Code 9316	Property Name COVINGTON "A" FEDERAL	Well Number 13
OGRD No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 3759

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	25	22 S	32 E		2310	SOUTH	1980	EAST	LEA

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

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
40			

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

	<p>OPERATOR CERTIFICATION</p> <p>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Cathy Tomberlin</i> Signature</p> <p>Cathy Tomberlin Printed Name</p> <p>Operations Technician Title</p> <p>03/30/99 Date</p>
	<p>SURVEYOR CERTIFICATION</p> <p>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.</p> <p>JULY 17, 1995 Date Surveyed</p> <p>SJA</p> <p>Signature & Seal of Professional Surveyor <i>[Signature]</i> 7-2795</p> <p>PROF. No. 95-1122</p> <p>Certified by JOHN M. WEST 676 PROFESSIONAL SURVEYOR J. EIDSON 3239 GARY EIDSON 12641</p>

DISTRICT I
P.O. Box 1980, Hobbs, NM 88240

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1984
Instruction on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

DISTRICT II
P.O. Drawer DD, Artesia, NM 88210

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

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

AMENDED REPORT

DISTRICT IV
PO BOX 2088, SANTA FE, NM 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code 51683	Pool Name UNDES. RED TANK BONE SPRINGS
Property Code 009316	Property Name COVINGTON "A" FEDERAL	Well Number 13
OGRID No. 17891	Operator Name POGO PRODUCING COMPANY	Elevation 3759

Surface Location

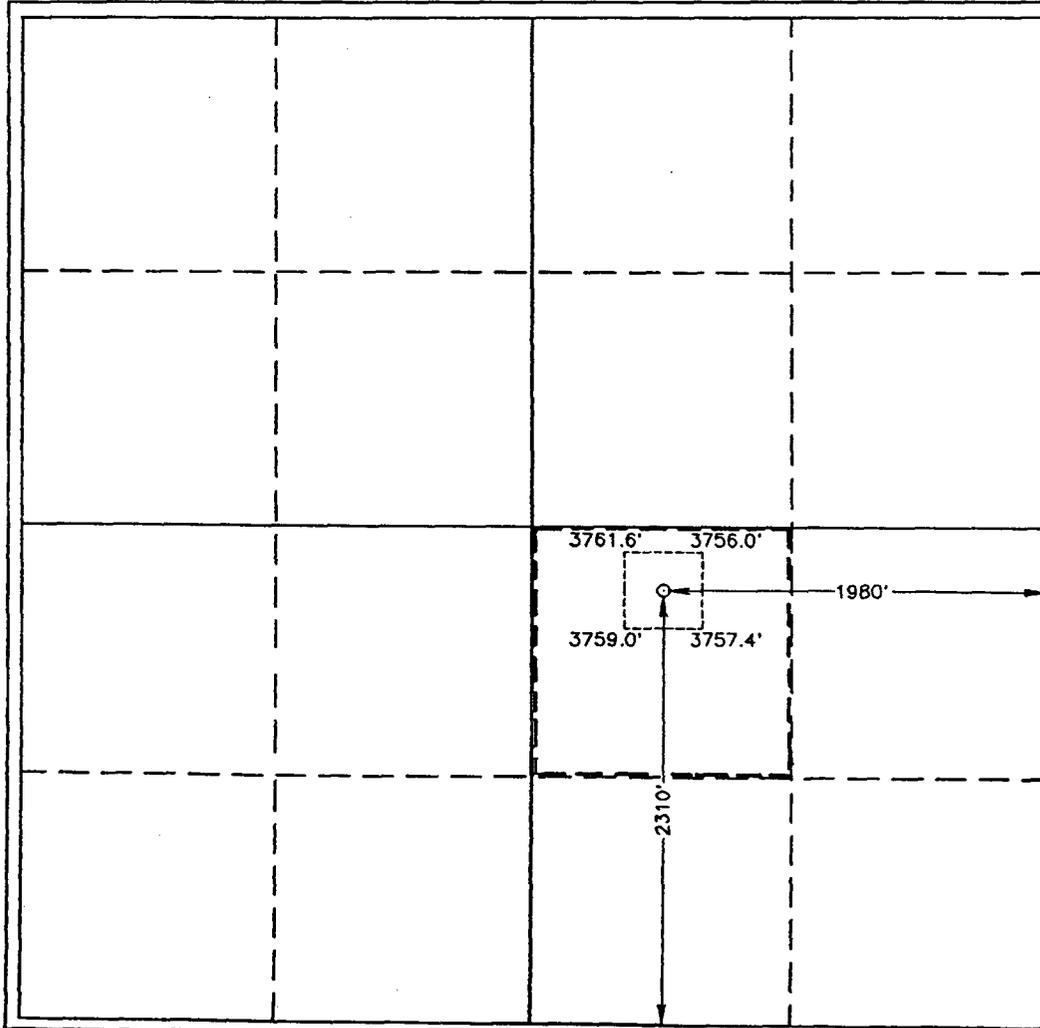
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	25	22 S	32 E		2310	SOUTH	1980	EAST	LEA

Bottom Hole Location If Different From Surface

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Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
40	N		

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



OPERATOR CERTIFICATION

I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.

Richard L. Wright
Signature

Richard L. Wright
Printed Name

Division Operations Mgr.
Title

August 31, 1995
Date

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.

July 17, 1995
Date

Richard L. Edson
Signature

Richard L. Edson
Professional Surveyor

7-2795
Num. 95-1122

Certified by
RONALD J. EDSON
676
3239
12641