AMEND MLC 11/29/99

Mid-Continent Region Production United States



P.O. Box 552 Midland, TX 79702-0552 Telephone 915/682-1626

NOV - 5 1999 CONSTRUCTION LAND MY ¥.

November 3, 1999

New Mexico Oil Conservation Division Attn: Mark Ashley 2040 South Pacheco Santa Fe, New Mexico 87505

Dear Mr. Ashley

Marathon Oil Company proposes to amend PLC-124 to allow the production that goes through the MOC Federal Central Tank Battery and the NIBU 11 Satellite Facility to be measured by lease instead of being measured by pool, as currently permitted. This change is being requested to bring these facilities into compliance with Bureau of Land Management regulations.

This will primarily affect the measurement of the North Indian Basin Unit. The current configuration has the North Indian Basin Unit Gas Com #3, Comanche Federal "3" #1, and the Comanche Federal "3" #2 wells producing into the same separator. The production is allocated back to the wells by well test. We propose to reroute the North Indian Basin Unit Gas Com #3 into a separator with other North Indian Basin Unit wells. This will allow the Comanche Federal wells to be measured by lease, and the North Indian Basin Unit wells to be measured by lease. Please find attached a more detailed explanation of the proposed operation, along with maps and drawings to help you understand the changes to be made. Also attached is a copy of the letter being sent by certified mail to all interest owners.

Thank you for your consideration of this matter. If you have questions, or need more information, please call me at 915-687-8449.

Sincerely,

Hinny Larke

Ginny Larke Engineer Technician

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Attachments

Form 3160-5 (November 1994) DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT 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.				FORM APPROVED Budget Bureau No. 1004-0135 Expires November 30 2000 5. Lease Serial No. See attachment 6. If Indian, Allottee or Tribe Name	
SUBMIT IN TRIPLICAT	E - Other instructions on	reverse side		7. If Unit or CA/Agreement, Name and/or N	
I. Type of Well Oil Gas X Other MOC Fe Well Well Name of Operator	ed. Central Batt	. & NIBU 11 Satell	ite Facil.	8. Well Name and No.	
Marathon Oil Company				9. API Well No.	
Ba. Address		3b. Phone No. (include area	code)	3. AFI wen No.	
P.O. Box 552 Midland, TX 79702		915-682-1626		10. Field and Pool, or Exploratory Area	
4. Location of Well (Footage, Sec., T., R., M., or Survey Descrip Section 36, T-20-S, R-24-E, Section 1, 2, 3, 10, 11, and E/2 of 12, T-2	n 36, T·20·1/2·S	, R-23-E, Sections		Indian Basin Upper Penn & <u>S. Dagger Draw Up. Penn As</u> ^{11.} County or Parish, State <u>Eddy</u> NM	
12. CHECK APPROPRI	ATE BOX(ES) TO IN	IDICATE NATURE OF N	OTICE, REPOR	T, OR OTHER DATA	
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CRA BLM FORMAT

APPLICATION FOR SURFACE COMMINGLING OFF LEASE MEASUREMENT, STORAGE AND ALTERNATIVE MEASUREMENT APPROVAL

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

<u>Marathon Oil Company</u> is requesting approval to amend the Surface Commingling and Off Lease Storage permit for the hydrocarbon production from the following State and Federal Lease(s):

Lease		API		
Name	BOPD	<u>Grav.</u>	<u>MCFD</u>	
MOC Federal	297	42	12,916	
North Indian Basin Unit	1,496	43	22,130	
Bone Flats Federal	732	42.3	1,926	
Comanche Federal "3"	17	47	8,876	
Stinking Draw	157	42.2	2,498	
Indian Hills State Com	164	43	2,435	

Lease numbers, locations and pools of these leases are as follows:

North Indian Basin Unit (Including Com #NM-SW 242)

Lease Numbers:	NM-0487-B, NM-05608, NM-05551, NM-05551-B, NM-SW242, & State Leases E-7906
	and E-10170
Description:	Section 2, S/2 Section 3, Section 10 and Section 11, T-21-S, R-23-E
Pool:	South Dagger Draw Upper Penn Associated Pool and (W/2 Sec. 3) Indian Basin Upper Penn
	Gas Pool

Comanche Federal Lease (Including Com # NM-SW 242)

Lease Numbers:	NM-04827-B, NM-34623, and NM-0384623
Description:	N/2 of Section 3, T-21-S, R-23-E
Pool:	South Dagger Draw Upper Penn Associated Pool (E/2 Sec. 3)

Bone Flats Federal "12" Lease

Lease Numbers:	NM-05608, NM-81677, and NM-05551-A
Description:	Section 2, T-21-S, R-23-E
Pool:	South Dagger Draw Upper Penn Associated Pool

MOC Federal Lease

Lease Numbers:	NM-04827-B
Description:	Section 1, T-21-S, R-23-E
Pool:	South Dagger Draw Upper Penn Associated Pool

Stinking Draw Lease

Lease Numbers:	State Leases K-1877 and E-10169-1
Description:	Section 36 T-201/2-S, R-23-E
Pool:	South Dagger Draw Upper Penn Associated Pool

Indian Hills State Com Lease

Lease Numbers:	State Lease E-10083
Description:	Section 36, T-20-E, R-24-E
Pool:	South Dagger Draw Upper Penn Associated Pool

The proposed operation is shown in detail on the attached diagrams. A map is enclosed showing the location of all leases and wells that contribute production to the commingling/common storage facility. Schematic diagrams are also attached which clearly identify all equipment that will be utilized.

The production from the North Indian Basin Unit Gas Com Well No. 3 is currently produced into a separator along with the production from the Comanche Federal "3" Wells No. 1 and 2. To bring this facility into compliance with BLM regulations, an amendment to PLC-124 is being requested from the State of New Mexico Oil Conservation Division that will allow the production from the leases mentioned above to be measured by lease before being commingled. The current order requires that the production be measured by pool before being commingled. To accomplish measurement by lease, the production from the North Indian Basin Unit Gas Com Well No. 3 will be rerouted to the separator that measures the North Indian Basin Unit wells at the NIBU 11 Satellite Facility. This will have all Unit wells measured together and all Comanche Federal wells measured together. Production will still be allocated back to each well on the basis of well tests per previous approvals.

The Storage and Measurement facility is located at UNIT Letter "D", Section 1, T-21-S, R-23-E, Eddy County, New Mexico. A satellite separation and measurement facility is located at UL "O", Sec. 2, T-21-S, R-23-E. The BLM will be notified of any change in facility location. Gas is measured using allocation meters. It is then transported to the Indian Basin Gas Plant (SW/NE, Section 23, T-21-S, R-23-E) by pipeline. After processing, the gas and NGLs are metered at the tailgate of the plant and sold. Liquid hydrocarbon production and water will be measured using turbine meters per prior approvals. These meters are proved on a regular schedule. Oil is then sold through a LACT unit. All production will be allocated to wells based on monthly well tests and the previously approved methods of lease allocation. The working interest owners have been notified of this commingling proposal by certified mail.

The proposed commingling of production is in the interest of conservation and will not result in reduced royalty or improper measurement of production. The proposed amendment will not require the purchase of new equipment, it will only require minor changes in the piping from the well's flowline to the separator.

Signature

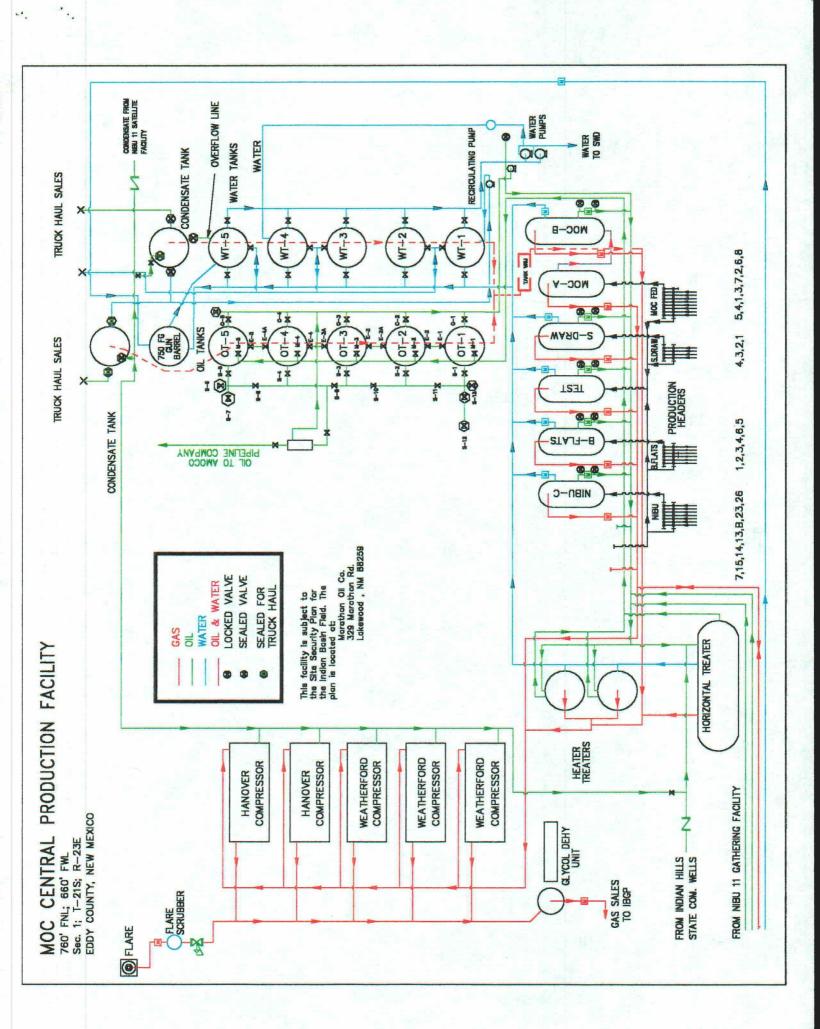
Ginny Larke

Name: Ginny Larke Title: Engineer Technician Date: November 3, 1999

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