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BEFORE THE  
OIL CONSERVATION COMMISSION  
STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF  
EL PASO NATURAL GAS COMPANY FOR AN  
ORDER REVISING AND AMENDING SUBSECTIONS  
II(d) AND V(d) OF RULE 112-A OF THE  
RULES AND REGULATIONS, NEW MEXICO OIL  
CONSERVATION COMMISSION, RELATING TO  
THE TYPE OF PRODUCTION PACKER REQUIRED  
FOR ADMINISTRATIVE APPROVAL OF MULTIPLE  
COMPLETIONS.

CASE NO. 1755

A P P L I C A T I O N

TO THE HONORABLE COMMISSION:

Comes now El Paso Natural Gas Company, hereinafter  
referred to as "Applicant," and alleges and states:

I.

Applicant is a Delaware corporation with a permit to do  
business in the State of New Mexico;

II.

Applicant has developed and will continue to develop  
various lands and leases by the drilling of wells in the State of  
New Mexico and in many instances, multiple completions have been,  
and will continue to be, desirable in order to prevent waste and  
the unnecessary drilling of wells;

III.

At present, Rule 112-A II(d) provides that dual comple-  
tions may be granted administratively without notice and hearing  
by the Secretary-Director of the Commission if, among other things,  
"The packer used to segregate the separate producing zones of the  
dual completion will be a permanent type production packer." Said  
subsection should be revised and amended so that it will hereafter  
read:

"The packer used to segregate the separate producing

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zones of the multiple completion shall be effective to prevent communication between all producing zones and may be either a permanent or a retrievable type production packer which shall be certified as adequate by the manufacturer or representative thereof as provided in Subsection V(d) of this rule."

#### IV.

At present, Rule 112-A V(d) is as follows:

"A packer setting affidavit shall accompany the report of the initial segregation test and packer leakage test."

This subsection should be revised and amended so that it will hereafter read:

"A packer setting affidavit shall accompany the report of the initial segregation test and packer leakage test and shall include a certification by the manufacturer of such packer or authorized representative thereof that the type of production packer to be used is adequate to satisfy the provisions of this rule with regard to the proposed completion."

#### V.

The granting of the relief sought in this application will prevent waste and will not violate or prejudice correlative rights, and will relieve all interested operators and the Commission of the time and expense that would otherwise result in holding unnecessary hearings;

#### VI.

The Commission has jurisdiction to hear and determine this cause, and said Rule 112-A II(d) and 112-A V(d) should be amended as set out above;

WHEREFORE, Applicant respectfully requests this matter

be set for hearing before this Commission as prescribed by law, and that upon due notice and hearing, the Commission issue its order amending Rule 112-A as above set out to effectuate the granting of multiple completions without notice and hearing when the requirements of Rule 112-A II and 112-A V, as so amended, are satisfied, and for such other and further relief either at law or in equity to which Applicant may show itself justly entitled.

Garrett C. Whitworth  
Attorney for Applicant

SETH, MONTGOMERY, FEDERICI & ANDREWS

By: Chun Shih  
Attorneys for Applicant