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NVS



POGO PRODUCING COMPANY

May 20, 2003

CM RRR 7160 3901 9844 0594 6662
New Mexico Oil Conservation Division
Attn: Mr. David R. Catanach
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: CEDAR CANYON PROSPECT
Eddy County, New Mexico
**APPLICATION FOR ADMINISTRATIVE APPROVAL
FOR DOWNHOLE COMMINGLING**
Harroun 15 № 13 Well
660' FSL and 360' FEL, Unit P,
Section 15, T-24-S, R-29-E
Pogo Lease № L668



Gentlemen:

Pogo Producing Company hereby respectfully submits Form C-107A (in duplicate), along with attachments thereto, in connection with Pogo's request for Administrative Approval to downhole commingle production from the captioned well. A copy of this application, along with all attachments thereto, has been sent to the New Mexico Oil Conservation Division's District Supervisor in Artesia, New Mexico, and the Bureau of Land Management.

Should you have any questions regarding this matter, please contact Mr. Mark Kelley in this office at (432) 685-8100.

Sincerely,

POGO PRODUCING COMPANY

R. Scott McDaniel
District Landman

RSM/dkr

Enclosures

cc (w/enclosures): New Mexico Oil Conservation Division
Attn: District Supervisor
1301 W. Grand Ave.
Artesia, New Mexico 88210-2834

Bureau of Land Management
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

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

District II
1301 West Grand Ave, Artesia, NM 88210

District III
1000 Rio Brazos Road, Aztec, NM 87410

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

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107A
Revised May 15, 2000

OIL CONSERVATION DIVISION

1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

APPLICATION TYPE

Single Well
 Establish Pre-Approved Pools
EXISTING WELLBORE
 Yes No

APPLICATION FOR DOWNHOLE COMMINGLING

Pogo Producing Company P. O. Box 10340 Midland, TX 79702-7340
Operator Harroun 15 Address 13 P, Sec 15, T-24-S, R-29-E Eddy
Lease 017891 Well No. 17565 Unit Letter-Section-Township-Range 30-015-31711 County X
OGRID No. Property Code API No. Lease Type: Federal State Fee

| DATA ELEMENT | UPPER ZONE | INTERMEDIATE ZONE | LOWER ZONE |
|--|--|-------------------|---|
| Pool Name | Cedar Canyon; Delaware ✓ | | Pierce Crossing, East; Bone Spring ✓ |
| Pool Code | 11540 | | 96473 |
| Top and Bottom of Pay Section (Perforated or Open-Hole Interval) | Perforations 5282-5310' | | Perforations 7780-7802' (Proposed) |
| Method of Production (Flowing or Artificial Lift) | Artificial Lift | | Artificial Lift |
| Bottomhole Pressure (Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone) | Current: 500 psi Producing (e) Original: 2100 psi Shut-In (e) | | Current: 2100 psi Initial Completion (e) Original: 2100 psi Partially Depleted (e) |
| Oil Gravity or Gas BTU (Degree API or Gas BTU) | 39.2 degrees API | | 42.8 degrees API |
| Producing, Shut-In or New Zone | Shut-In | | New Zone to be Completed |
| 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.) | Date: 4-19-03 Rates: 3 BO, 20 BW, 11 MCF | Date: Rates: | Date: Estimated Rates: 7 BO, 4 BW, 55 MCF (Based on last test of equivalent SI zone in direct north offset Harroun 15 #4) |
| Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.) | Oil 30 % Gas 17 % | Oil % Gas % | Oil 70 % Gas 83 % |

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones? Yes No
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail? Yes No

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

Will commingling decrease the value of production? Yes No

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

NMOCD Reference Case No. applicable to this well: _____

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 working, royalty and overriding royalty interests for uncommon interest cases.
- Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

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

SIGNATURE Mark V. Kelley TITLE Sr. Petroleum Engineer DATE 5-16-2003
Mark V. Kelley 915 685-8100
TYPE OR PRINT NAME TELEPHONE NO. ()

DISTRICT I
P.O. Box 1888, Hobbs, NM 88241-1888

State of New Mexico

Energy, Minerals and Natural Resources Department

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

DISTRICT II
P.O. Drawer 88, Artesia, NM 88211-0718

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT III
1000 El Estero Rd., Arto, NM 87410

DISTRICT IV
P.O. Box 2088, Santa Fe, N.M. 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

| | | |
|----------------------------|---|---|
| API Number 30-015-31711 | Pool Code 96473 | Pool Name Pierce Crossing, East; Bone Spring |
| Property Code 17565 | Property Name HARROUN "15" | Well Number 13 |
| OGRID No. 017891 | Operator Name POGO PRODUCING COMPANY | Elevation 2942' |

Surface Location

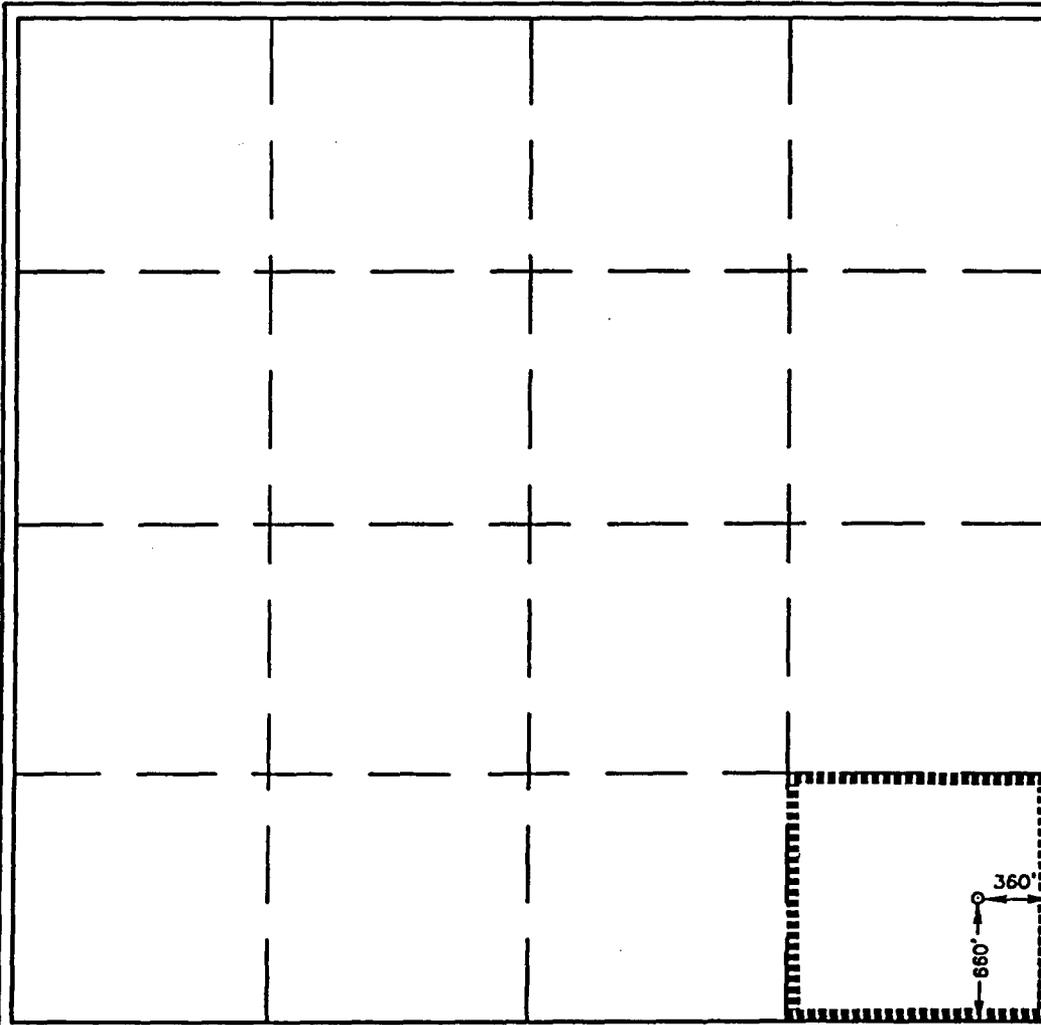
| UL or lot No. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| P | 15 | 24-S | 29-E | | 660 | SOUTH | 360 | EAST | EDDY |

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 40 | Joint or Infill | Consolidation Code | 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



OPERATOR CERTIFICATION

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

Barrett L. Smith
Signature

Barrett L. Smith
Printed Name

Div. Operations Engr.
Title

5-15-2003
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.

APRIL 10, 2001
Date Surveyed

AWB

Signature & Seal of Professional Surveyor
Ronald G. Eidson

RONALD G. EIDSON
GARY EIDSON
Certificate No. 3239 12641

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

State of New Mexico

Energy, Minerals and Natural Resources Department

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

DISTRICT II
P.O. Drawer 50, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

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

DISTRICT IV
P.O. BOX 2088, SANTA FE, N.M. 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

| | | |
|----------------------------|---|-------------------------------------|
| API Number 30-015-31711 | Pool Code 11540 | Pool Name Cedar Canyon, Delaware |
| Property Code 17565 | Property Name HARROUN "15" | Well Number 13 |
| OGRID No. 017891 | Operator Name POGO PRODUCING COMPANY | Elevation 2942' |

Surface Location

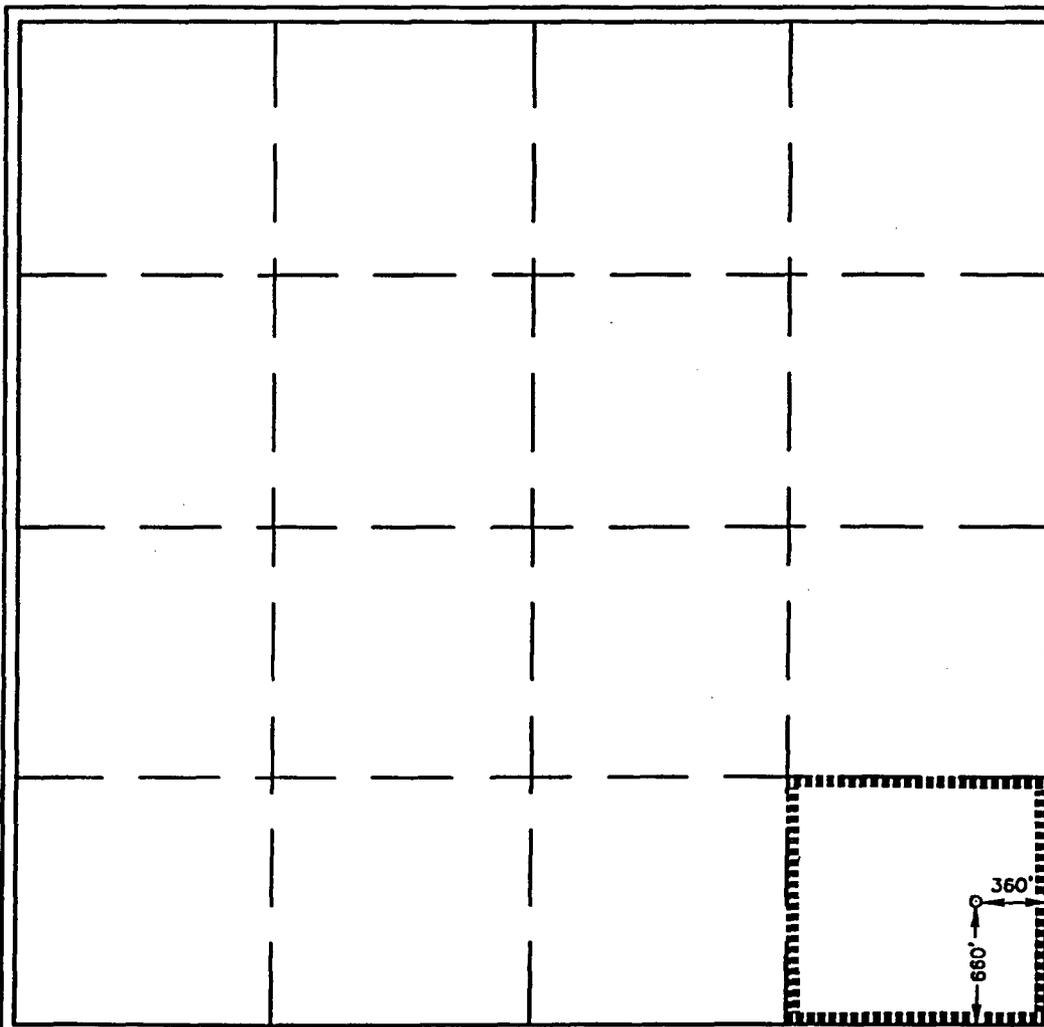
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|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
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I hereby certify that the information contained herein is true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

Barrett L. Smith
Signature

Barrett L. Smith
Printed Name
Div. Operations Engr.

5-15-2003
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.

APRIL 10, 2001

Date Surveyed AWB
Signature & Seal of Professional Surveyor

Certificate No. RONALD G. EDSON 3239
GARY EDSON 12841

Lease Name: HARROUN 15
County, State: EDDY, NM
Operator: POGO PRODUCING COMPANY
Field: CEDAR CANYON
Reservoir: DELAWARE
Location: 15 24S 29E E2 SE SE

WELL #13 - CUM PROD FROM 09/2001: 2,493 bbl OIL, 5,813 mcf GAS, 16,670 bbl WTR LOC: 15 24S 29E E2 SE SE

