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6/30/99

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**POGO PRODUCING COMPANY**

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

JUN 10 1999

June 4, 1999

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

RE: Southeast Red Tank Prospect  
Lea County, New Mexico  
Application for Administrative Approval  
for Downhole Commingling in the  
Covington "A" Federal No. 6 Well  
located 1980' FNL and 2310' FWL  
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

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

APPROVAL PROCESS:

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 6 Address F, 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. 30-025-31851 Spacing Unit Lease Types: (check 1 or more) Federal  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)	7916' - 8484'		8830' - 8850'
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.	a.  1500 psi SI (estimated)
	b. (Original) 3218 psi SI	b.	b. 3637 psi SI
6. Oil Gravity ( API) or Gas BTU Content	41.2		42.1
7. Producing or Shut-In?	PRODUCING		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)	NO		YES
	Date: 5-21-99 Rates: 87 BO, 111 BW, 58 MCF	Date: Rates:	Date: 1-13-96 Rates: 13 BO, 4 BW, 68 MCF
	Date: Rates:	Date: Rates:	Date: Rates:
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: 87% Gas: 46%	Oil: % Gas: %	Oil: 13% Gas: 54%

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)

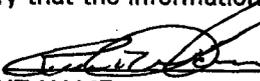
14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application.  Yes \_\_\_ No

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:  FILE: 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

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

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

OIL CONSERVATION DIVISION

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

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-31851	Pool Code 51683	Pool Name RED TANK BONE SPRINGS
Property Code	Property Name COVINGTON "A" FEDERAL	Well Number 6
OGRID No. 17891	Operator Name POGO PRODUCING CO.	Elevation 3771

Surface Location

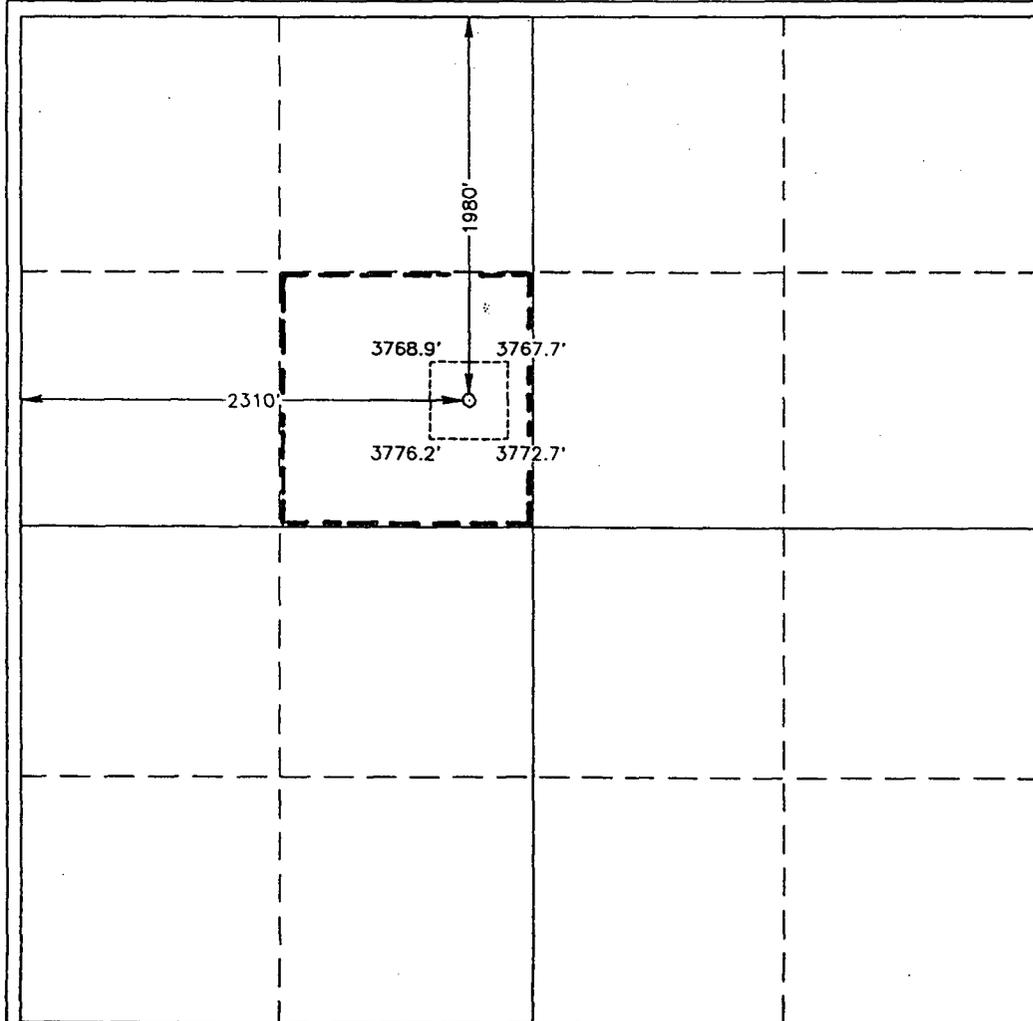
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
F	25	22 S	32 E		1980	NORTH	2310	WEST	LEA

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 40	Joint or Infill N	Consolidation Code	Order No.
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NO ALLOWABLE WILL BE ASSGND 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

April 14, 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.

APRIL 6, 1995

Date Surveyed: APRIL 6, 1995  
Signature & Seal of Professional Surveyor

*Richard L. Wright*  
WFO. Num. 95-114-0529

Certified by JOHN W. WEST 676  
PROFESSOR R. EIDSON 3239  
EIDSON 12641

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, 1994  
Instruction on back  
Submit to Appropriate District Office  
State Lease - 4 Copies  
Fee Lease - 3 Copies

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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

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-31851	Pool Code 51689	Pool Name Red Tank West Delaware
Property Code 9316	Property Name COVINGTON "A" FEDERAL	Well Number 6
OGRD No. 017891	Operator Name POGO PRODUCING CO.	Elevation 3771

Surface Location

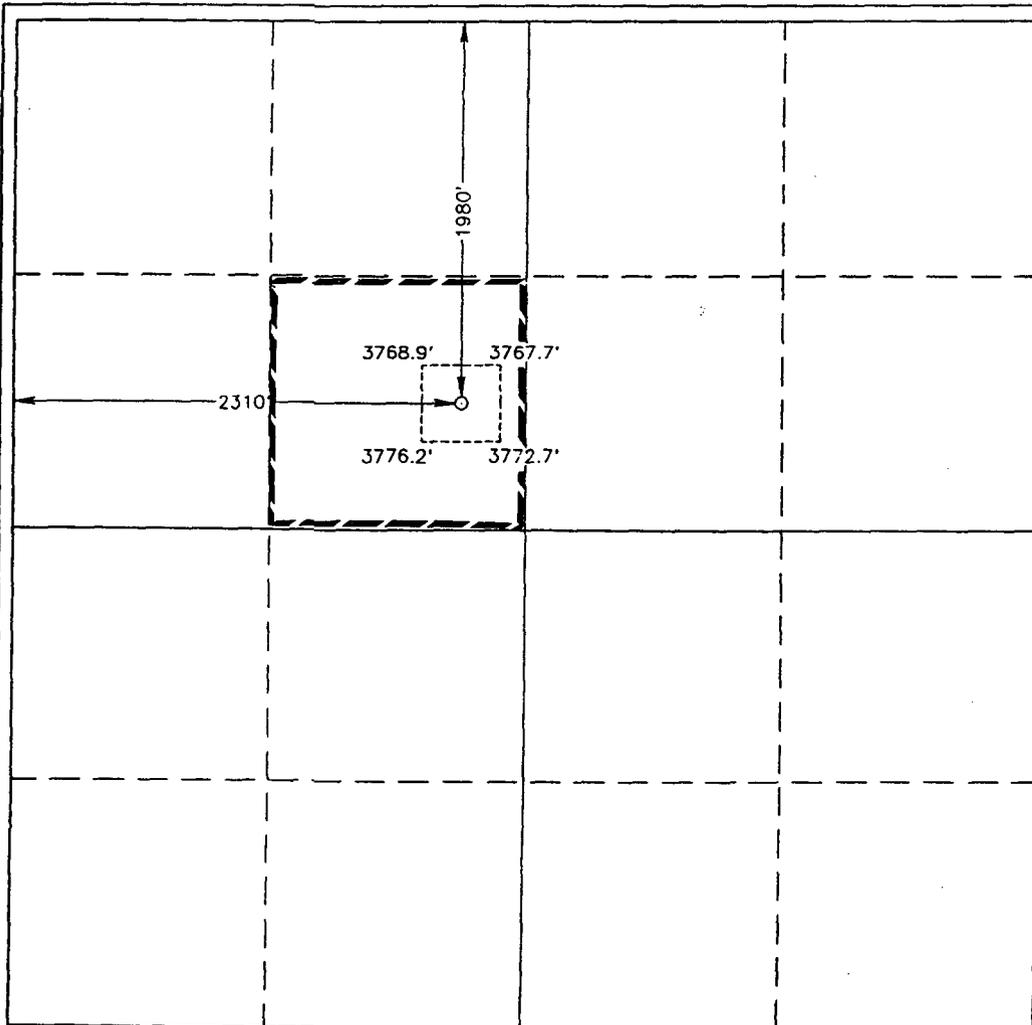
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UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres 40	Joint or Infill	Consolidation Code	Order No.
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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

Senior Operations Engineer  
Title

3/14/96  
Date

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**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 6, 1995  
Date Surveyed

Signature & Seal of Professional Surveyor  
*John W. West*

W.O. Num. 95-11-0529

Certified to: JOHN W. WEST 676  
RONALD J. EIDSON 3239  
CARY EIDSON 12641