

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

- [1] **TYPE OF APPLICATION - Check Those Which Apply for [A]**
 [A] Location - Spacing Unit - Simultaneous Dedication
 NSL NSP SD

 Check One Only for [B] or [C]
 [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM

 [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

 [D] Other: Specify _____
- [2] **NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply**
 [A] Working, Royalty or Overriding Royalty Interest Owners
 [B] Offset Operators, Leaseholders or Surface Owner
 [C] Application is One Which Requires Published Legal Notice
 [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
 [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
 [F] Waivers are Attached

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[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Kem E. McCready Print or Type Name	<u>Kem E McCready</u> Signature	NM Operations Manager Title	08/12/2008 Date
		kem@naguss.com e-mail Address	

NADEL AND GUSSMAN PERMIAN, L.L.C.

601 N. Marienfeld, Suite #508
Midland, Texas 79701
(432) 682-4429
Fax (432) 682-4325

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Oil Conservation Division
Attn: William Jones
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Downhole Commingling and Measurement of
Hydrocarbon Production for:
Cebo State #1
Section 10, T16S, R33E
Lea County, New Mexico

Nadel and Gussman Permian L.L.C as operator of the referenced well respectfully requests administrative approval for downhole commingling and measurement of production.

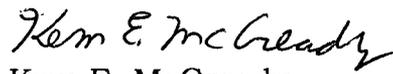
Nadel and Gussman Permian proposes to commingle Hume Queen West and Hume Grayburg West production in the Cebo State #1 API 30-025-38954 (Property Code 37182). Production of both pools will be measured at the Cebo State Tank Battery.

Nadel and Gussman has notified to all parties owning an interest in this lease of the intent to commingle.

Nadel and Gussman Permian is respectfully requesting administrative approval of this application to downhole commingle. Several downhole commingling orders have been approved for these two zones. The approved orders are DHC - 3442, 3466, 3497, 3498, 3499 and 3599. In addition, our existing Angler State #1 and #2 wells are producing from both zones under DHC Orders 3628 and 3752.

NGP also requests that we be allowed 60 days following completion to submit the allocation percentages. A 60 day time period is necessary to allow us to adequately test all intervals to be commingled.

Yours truly,


Kem E. McCready
Operations Manager
Nadel and Gussman Permian
kemm@naguss.com

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

District II
1301 W. Grand Avenue, Artesia, NM 88210

District III
1000 Rio Brazos Road, Aztec, NM 87410

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

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107A
Revised June 10, 2003

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

DAC-4078

Operator Nadel and Gussman Permain Address 601 N. Marienfeld Suite 508 Midland Texas 79701

Lease Cebo State Well No. 1 Unit Letter-Section-Township-Range P S10 T16S R 33E County LEA

OGRID No. 155615 Property Code 37182 API No. 30-025-38954 Lease Type: Federal State Fee

DATA ELEMENT	UPPER ZONE <i>UNDER</i>	INTERMEDIATE ZONE	LOWER ZONE <i>UNDER</i>
Pool Name	Hume Queen West <i>012</i>		Hume Grayburg West <i>011</i>
Pool Code	33560		97444
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	3649-3937 OH		3968-4381 OH
Method of Production (Flowing or Artificial Lift)	Artificial		Artificial
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)			
Oil Gravity or Gas BTU (Degree API or Gas BTU)	36.8		36.8
Producing, Shut-In or New Zone	New Zone		New Zone
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: Rates:	Date: Rates:	Date: Rates:
Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)	Oil Gas %	Oil Gas %	Oil Gas %

allocation later (60 DAYS)

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones?
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: DHC 3762

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.

