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DEC 0 4 1995

OIL CON. DIV. DIST. 2

MIDLAND PRODUCTION ORGANIZATION
OPERATIONS INTEGRITY

December 1, 1995

Avalon (Delaware) Unit Variance to OCD Rule 107

State of New Mexico
Oil Conservation Division
P.O. Box DD
Artesia, New Mexico 88210

Attention: Mr. Tim Gum

Exxon requests a variance to the Oil Conservation Division Rule 107 - Casing and Tubing Requirements, Item G.(1) which states, "Option 1 - Allow all casing strings to stand cemented a minimum of eighteen (18) hours prior to commencing tests." The requested variance will authorize a minimum cement standing time of twelve (12) hours prior to commencing tests on our Avalon (Delaware) Unit drill wells.

The attached test results clearly demonstrate that both the zones of interest for surface casing ($\pm 300^{\circ}$) to 600°) and for intermediate/production casing ($\pm 1960^{\circ}$) to 2450°) are adequately protected by each tail slurry attaining a compressive strength far in excess of 500 psi in the requested twelve (12) hour time period (962 psi and 1022 psi respectively).

If you are in agreement with this request, please complete the approval block provided below and return this letter to me. Please contact me at (915) 688-7876 if you would like to discuss this request further.

Sincerely,

Joe R. Glass

Approval Signature

Title

Date

JRG:mym

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A DIVISION OF EXXON CORPORATION