September 30, 2002

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Rd. Aztec, New Mexico 87410

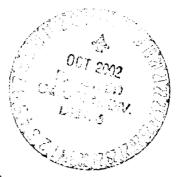
RE:

Allocation for Downhole Commingling

San Juan 28-7 #227G API#30-039-26959

Sec. 36 T28N R7W Unit Letter O

Blanco Mesaverde 72319 Basin Dakota 71599



Mr. Chavez

This well was drilled in July 2002 and completed August, 2002. Initial flow tests as reported by the field operator indicated:

Mesaverde (2 3/8" tubing at 4350')

08/08/02 ½" choke

175 psi tbg. press.

240 psi csg. press.

1155 MCFPD +

0 BOPD + 1 BWPD

Dakota (2 3/8" tubing with packer at 6985')

08/13/02 1/2" choke

85 psi tbg. press.

240 psi csg. press.

561 MCFPD +

0 BOPD + 5 BWPD

Based on these initial inflow tests, calculated DHC allocation percentages are:

Fixed Allocation (Gas) Dakota

33%

Mesaverde

67%

Fixed Allocation (Oil) Dakota

33%

Mesaverde

67%

No significant amounts of oil were produced during the test. Based on production data from offset wells, Dakota and Mesaverde are expected to produce with similar gas to condensate ratios. Therefore oil production is allocated using the same percentage as for gas production.

14-14-74-Z

If you need additional information please give me a call at (832) 486-2326. Thank you for your time.

Sincerely,

Deborah Marberry

Regulatory Analyst

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