



May 23, 1994

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
State Land Office Building
P. O. Box 2088
Santa Fe, NM 87504

File: WGW-460-988.LR72

Dear Mr. LeMay

Rule 112 -A- Multiple Completions / Operation & Testing
Thurston Com A 1E
Sec. 31- T31N-R11W
San Juan, New Mexico

Amoco Production Company requests an exception to Rule 112-A which requires a packer leakage test commence not later than fifteen (15) days after multiple completion of a well.

The subject well was completed May 4, 1994 in the Blanco Mesavéde as a dual completion with the existing Dakota formation. Your District Office will not grant approval because of the fifteen (15) day period. We therefore request your approval to conduct a packer leakage test with the first 90 days after the well has first delivered so we can minimize gas vented to the atmosphere.

Additionally, we would like to request waiver of the stipulated 15 day period for conducting packer leakage test on all future dual completions and instead have the option to complete this requirement within the first 90 days after the well has first delivered. We believe this would be in the best interest of conservation by minimizing gas vented to the atmosphere and is also more economically sound for Amoco as the operator.

If you have questions, please contact Dallas Kalahar at (303) 830-5129.

Sincerely,

Dallas Kalahar
Business Analyst

cc: State of New Mexico
Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

Southern

Rockies

Business

Unit

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MAY 25 1994
OIL CON. DIV.
DIST. 3