



September 8, 2020

Mr. Dean McClure  
New Mexico Oil Conservation Division  
Engineering Bureau  
1220 South St Francis Drive  
Santa Fe, NM 87505

RE: Amend Administrative Order PLC-644  
Black and Tan 27 Federal Central Tank Battery  
Sec 27 T20S R34E  
Lea County, New Mexico

Dear Mr. McClure:

Apache would like to amend Administrative Surface Commingling Order PLC-644 to remove the verbiage regarding quarterly testing, as listed in Item 8 of the Order, stated as follows:

"8. Applicant shall submit a Form C-103 each quarter to the Engineering Bureau in Santa Fe that identifies the following information for each well: (a) the allocation method; (b) the current decline rate; (c) the minimum number of well tests per month required by Paragraphs 6 or 7, as applicable; and (d) the number of well tests conducted each month."

Apache currently more than meets the minimum testing requirements, as well as Federal Standards. There is also a voluntary Joint Operating Agreement in effect to cover any variances in ownership, as provided in the original surface commingle application.

If you need additional information or have any questions, please give me a call at (432) 818-1062 or send an e-mail to [Reesa.Fisher@apachecorp.com](mailto:Reesa.Fisher@apachecorp.com).

Sincerely,

*Reesa Fisher*

Reesa Fisher  
Sr. Staff Regulatory Analyst