COMMISSIONER'S OFFICE Phone (505) 827-5760 Fax (505) 827-5766

ADMINISTRATION Phone (505) 827-5700 Fax (505) 827-5853

GENERAL COUNSEL Phone (505) 827-5713 Fax (505) 827-4262

PUBLIC AFFAIRS Phone (505) 827-1245 Fax (505) 827-5766

December 8, 1999

Phillips Petroleum Company 5525 Hwy. 64 Farmington, New Mexico 87401

Attn: Mr. Mark Stodola

Re: Downhole Commingling Allocation Method (San Juan 29-5 Unit Well Nos. 32M, 57M and 67M Blanco Mesaverde and South Blanco Pictured Cliffs Pools Rio Arriba County, New Mexico

Dear Mr. Stodola:

This office is in receipt of your letter of November 12, 1999, wherein due to a change of plans, you are requesting to change the allocation method of your previous commingling application regarding the above-captioned wells.

It is our understanding that you will now use the subtraction method between 6 and 12 months and then utilize the ratio method which will give the Mesaverde time to stabilize.

Your request is hereby approved. Any deviation from the substance of your request will be sufficient grounds for rescinding our approval. Our approval is subject to like approval by the New Mexico Oil Conservation Division and the Bureau of Land Management.

If you have any questions or if we may be of further help, please contact Pete Martinez at (505) 827-5791.

Very truly yours,

RAY POWELL, M.S., D.V.M. COMMISSIONER OF PUBLIC LANDS

BY:

JAMI BAILEY, Director Oil, Gas and Minerals Division (505) 827-5744

RP/JB/cpm Enclosure xc: Reader File

OCD=Attention: David Catanach, Ben Stone

BLM

COMMERCIAL RESOURCES Phone (505) 827-5724 Fax (505) 827-6157

MINERAL RESOURCES Phone (505) 827-5744 Fax (505) 827-4739

ROYALTY MANAGEMENT Phone (505) 827-5772 Fax (505) 827-4739

SURFACE RESOURCES Phone (505) 827-5793 Fax (505) 827-5711



DHC-2132

New Mexico State Land Office Commissioner of Public Lands Ray Powell, M.S., D.V.M.

"WE WORK FOR EDUCATION" 310 Old Santa Fe Trail, P. O. Box 1148 Santa Fe, New Mexico 87504-1148