## OIL CONSERVATION COMMISSION

P. O. BOX 871 SANTA FE, NEW MEXICO

February 3, 1961

Mr. Ralph L. Gray 201 Carper Building Artesia, New Mexico

Re: TX-6

Mearburg and Ingram

Midhurst No. 1

Dear Sira

Reference is made to your letter of January 31, 1961, wherein you have requested an exception to the tubing depth requirements of Commission Rule 107 (d) for Mearburg and Ingram's Midhurst Well Bo. 1, located in the BW/4 BW/4 of Section 35, Township 12 South, Range 37 East, BMPM, Lea County, New Mexico.

It is our understanding that this well is perforated in the Pennsylvanian at approximately 11,100 feet but that the Pennsylvanian tubing is set at approximately 8,800 feet, thereby making it necessary to flow the well through some 2,300 feet of casing.

The Oil Conservation Commission does not look with particular favor upon this sort of installation. However, under the circumstances which you enumerate in your letter, we will approve same with the stipulation that this authority may be revoked if at any time it appears that waste may be resulting from inefficient flow.

Very truly yours,

A. L. PORTER, Jr., Secretary-Director

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cc: Oil Conservation Commission - Hobbs

MAIN OFFICE OCC

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RALPH L. GRAY

PETROLEUM ENGINEERING - PRODUCTION
CONSULTANT
201 CARPER BUILDING

ARTESIA, NEW MEXICO

January 31, 1961

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New Mexico Oil Conservation Commission Box 871 Santa Fe, New Mexico

Attention: Mr. A. L. Porter, Jr., Secretary and Director

Dear Mr. Porter:

On November 30, 1960, the Commission heard Case No. 2134, which was an application by Nearburg and Ingram for a dual completion, as well as other items, at their Midhurst Well #1, Lea County, New Mexico.

At the hearing, Mr. Ralph L. Gray gave testimony concerning the mechanics and method to be used in making the dual completion. Exhibit No. 2 was submitted showing a diagrammatic sketch of how the equipment would be installed. It was the operator's belief at the time that this diagram showed that the short string of tubing would be run to approximately 8800 feet with a seating nipple placed in the bottom of tubing string. However, we now find that this was not given in the testimony, and apparently the Commission members did not realize that the operator intended to set the bottom of tubing string at about 8800', which would have been an exception to Rule 107.

The reason for setting the upper packer and bottom of short tubing string at approximately 8800 feet was as follws. The casing program involved setting 17 pound pipe to 8865 feet and 20 pound pipe below this depth. Because of the exceptionally close tolerance, it was not thought advisable to attempt to run two strings of 2-1/16" O. D. tubing into the heavier casing. The running of a smaller string of tubing below this point had undesirable aspects such as a possible paraffin problem later in the life of the well and a possible difficulty in removing the paraffin. The annular space below the top packer is approximately equal to a string of 4" tubing. It is the opinion of the operator that flow through this space from 11,100 feet where the Pennsylvanian is perforated to 8800 feet can be accomplished without waste, and is more desirable than running a small string of tubing below the upper packer. It is also the opinion of the operator that the well can be pumped from approximately 8800 feet for substantially the economic life of the well, since there appears to be abundant gas associated with the oil. This dual installation was completed on January 19, 1961.

We regret that this misunderstanding existed at the hearing.

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We respectfully request the Commission to approve this exception to Rule 107 by administrative order, so that an allowable for the Pennsylvanian zone can be issued as soon as possible.

Respectfully submitted,

NEARBURG AND INGRAM

Registered Petroleum Engineer

RLG:1w