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**POGO PRODUCING COMPANY**

March 20, 2001

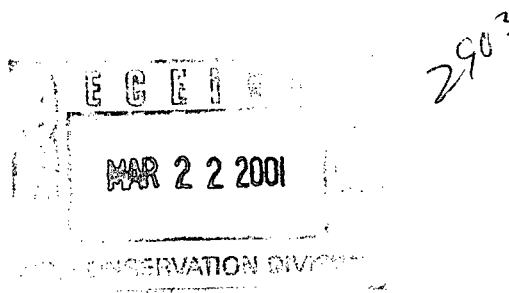
Via CM RRR 7099 3220 0005 5521 1209

New Mexico Oil Conservation Division

Attn: Mr. David R. Catanach

2040 South Pacheco Street

Santa Fe, New Mexico 87505



Re: RED TANK, SE PROSPECT

Lea County, New Mexico

APPLICATION FOR ADMINISTRATIVE APPROVAL FOR DOWNHOLE COMMINGLING

Covington "A" Federal No 37 Well

1,575' FSL and 1,950' FEL, Section 25, T-22-S, R-32-E, N.M.P.M.

Federal Oil and Gas Lease NM-2379

Pogo Lease L12

Gentlemen:

Pogo Producing Company respectfully submits Form C-107A (in duplicate), along with attachments thereto, in connection with Pogo's request for Administrative Approval to downhole commingle production from the captioned well.

Should you have any questions regarding this matter, please give me a call at (915) 685-8120.

Sincerely,

POGO PRODUCING COMPANY


Terry Gant
Division Landman

Enclosures

cc (w/enclosure): New Mexico Oil Conservation Division
Attn: District Supervisor
P.O. Box 1980
Hobbs, New Mexico 88240

Bureau of Land Management
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

District I
1625 N. French Drive, Hobbs, NM 88240

District II
811 South First Street, Artesia, NM 88210

District III
Well
1000 Rio Brazos Road, Aztec, NM 87410

District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107A
Revised May 15, 2000

OIL CONSERVATION DIVISION
2040 South Pacheco

APPLICATION TYPE
 X Single

Santa Fe, New Mexico 87505

 Establish Pre-Approved Pools
EXISTING WELLBORE
 X Yes No

APPLICATION FOR DOWNHOLE COMMINGLING

Pogo Producing Company	P. O. Box 10340	Midland, TX 79702-7340	
Operator Covington A Federal	37	Address J, Sec 25, T-22-S, R-32-E	Lea
Lease 017891	Well No. 9316	Unit Letter-Section-Township-Range 30-025-34455	County X
OGRID No. _____	Property Code _____	API No. _____	Lease Type: <u> </u> Federal <u> </u> State <u> </u> Fee

DATA ELEMENT	UPPER ZONE	INTERMEDIATE ZONE	LOWER ZONE
Pool Name	Red Tank; Delaware, West		Red Tank; Bone Spring
Pool Code	51689		51683
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	8608' – 8628'		8821' – 8841'
Method of Production (Flowing or Artificial Lift)	Artificial Lift		Artificial Lift
Bottomhole Pressure (Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone)	Current: 300 psi Producing (e) Original: 3218 psi Shut-In		Current: 1800 psi Shut-In (e) Original: 3637 psi Shut-In
Oil Gravity or Gas BTU (Degree API or Gas BTU)	40.8 degrees API		41.6 degrees API
Producing, Shut-In or New Zone	Producing		Shut-In
Date and Oil/Gas/Water Rates of Last Production. (Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data.)	Date: 1-20-01 Rates: 11 BO, 32 BW, 14 MCF	Date: Rates:	Date: 10-28-99 Rates: 40 BO, 15 BW, 244 MCF
Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)	Oil Gas 22 % 5 %	Oil Gas % %	Oil Gas 78 % 95 %

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones?	Yes <u> X </u> No <u> </u>
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail?	Yes <u> </u> No <u> </u>
Are all produced fluids from all commingled zones compatible with each other?	Yes <u> X </u> No <u> </u>
Will commingling decrease the value of production?	Yes <u> </u> No <u> X </u>
If this well is on, or communitized with, state or federal lands, has either the Commissioner of Public Lands or the United States Bureau of Land Management been notified in writing of this application?	Yes <u> X </u> No <u> </u>
NMOCD Reference Case No. applicable to this well: _____	


- Attachments:
- C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
 - Production curve for each zone for at least one year. (If not available, attach explanation.)
 - For zones with no production history, estimated production rates and supporting data.
 - Data to support allocation method or formula.
 - Notification list of working, royalty and overriding royalty interests for uncommon interest cases.
 - Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE 	TITLE <u>Div. Petroleum Engineering Mgr.</u>	DATE <u>3-20-2001</u>
TYPE OR PRINT NAME <u>Ron D. Gasser</u>	TELEPHONE NO. <u>915 685-8100</u>	

DISTRICT I

P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico

Energy, Minerals and Natural Resources Department

Form C-102

Revised February 10, 1994

Submit to Appropriate District Office

State Lease - 4 Copies

Fee Lease - 3 Copies

DISTRICT II

P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV

P.O. BOX 2088, SANTA FE, N.M. 87504-2088

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-34455	Pool Code 51683	Pool Name Red Tank; Bone Spring
Property Code 9316	Property Name COVINGTON "A" FEDERAL	Well Number 37
OGRID No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 3762

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
K	25	22 S	32 E		1575	SOUTH	1950	EAST	LEA

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres 40	Joint or Infill	Consolidation Code	Order No.						

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature Barrett L. Smith Printed Name Sr. Operations Engineer Title March 9, 2001 Date
	SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. JUNE 3, 1998 Date Surveyed Signature & Seal of Professional Surveyor No. RONALD J. EIDSON 3239 12641 12185

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

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P.O. Drawer DD, Artesia, NM 88211-0719

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State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
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Fee Lease - 3 Copies

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-34455	Pool Code 51689	Pool Name Red Tank; Delaware, West
Property Code 9316	Property Name COVINGTON "A" FEDERAL	Well Number 37
OGRID No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 3762

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
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Bottom Hole Location If Different From Surface

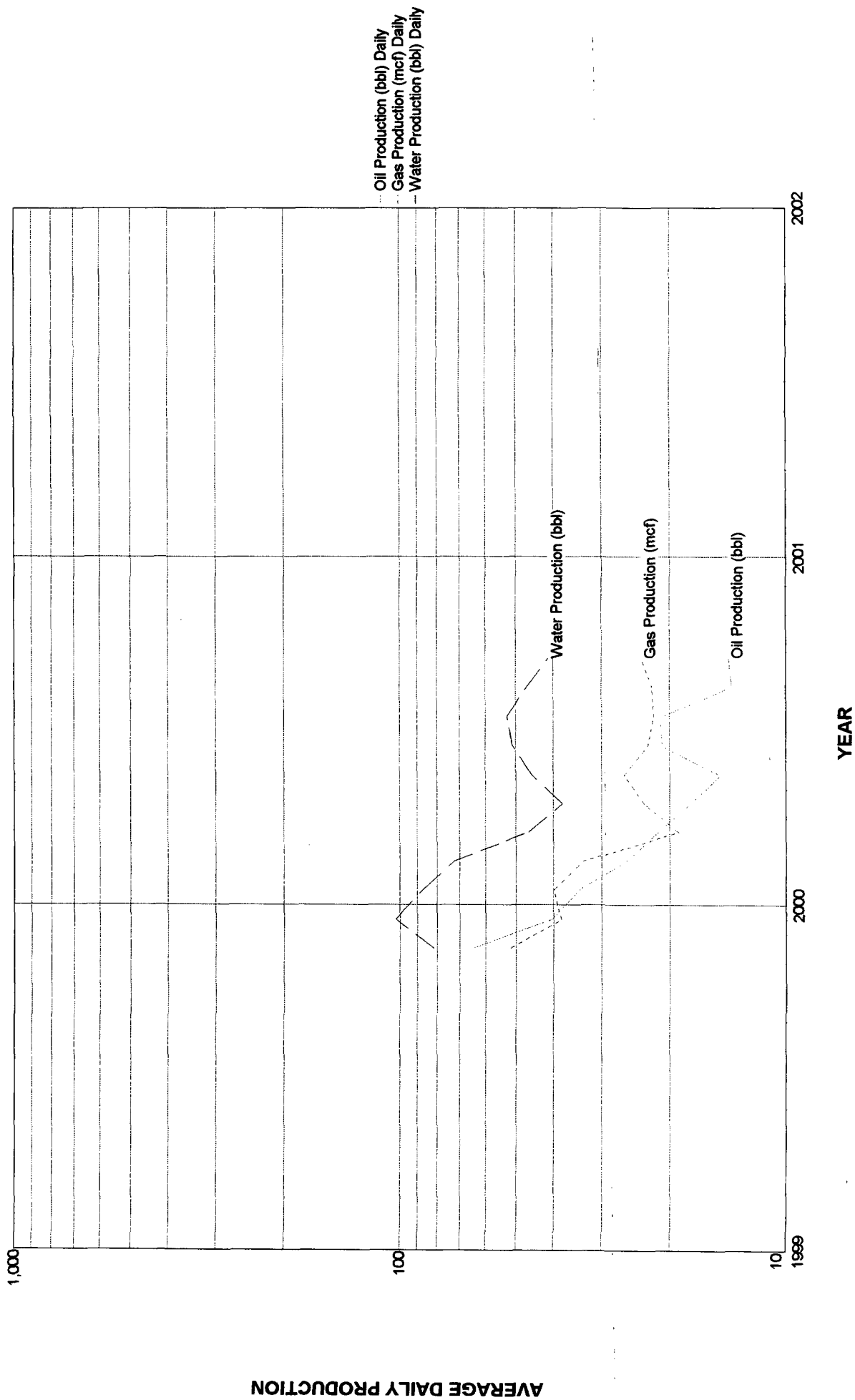
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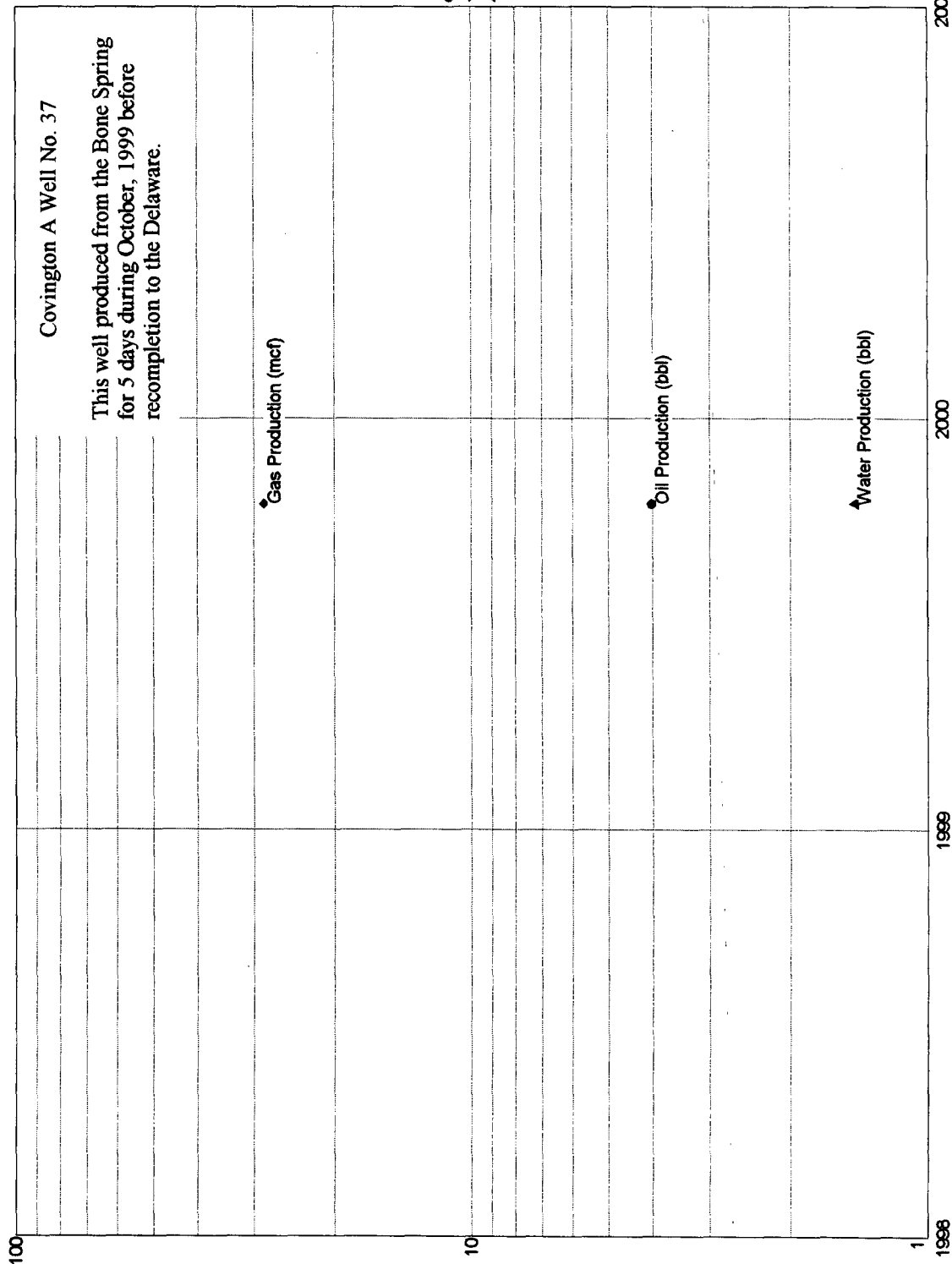
Lease Name: COVINGTON A FEDERAL
 County, State: LEA, NM
 Operator: POGO PRODUCING COMPANY
 Field: RED TANK WEST
 Reservoir: DELAWARE
 Location: 25 22S 32E NW SE

WELL NUMBER 37



Lease Name: COVINGTON A FEDERAL
 County, State: LEA, NM
 Operator: POGO PRODUCING COMPANY
 Field: RED TANK
 Reservoir: BONE SPRING
 Location: 25 22S 32E NW SE

WELL NUMBER 37



AVERAGE DAILY PRODUCTION

● Oil Production (bbl) Daily
 ◆ Gas Production (mcf) Daily
 ▲ Water Production (bbl) Daily