

April 7, 1998

P.O. Box 2409 Hobbs, NM 88241-2409 Telephone 505/393-7106

Ms. Lori Wrotenbery, Director State of New Mexico Oil Conservation Division PO Box 2088 Santa Fe NM 87504-2088

Re: Request for Exemption to Rule 309-A

Surface Lease Commingling

Henry Courtman '4' St. Lease E 1/2, Sec. 4, T-19-S, R-28-E Eddy County Travis - Upper Penn James Buchanan '33' St. Lease E 1/2, Sec. 33, T-18-S, R-28-E David Crockett '27' St. Lease S 1/2, Sec. 27, T-18-S, R-28-E

Travis - Upper Penn Order No. CTB-467

Ms. Lori Wrotenbery:

Marathon Oil Company respectfully requests the State of New Mexico Oil Conservation Division to grant administrative approval for exemption to Rule 309-A for the above mentioned leases.

Marathon Oil Company proposes to produce the three leases to a common stock tank battery with separate metering facilities prior to commingling. The common battery will be at the James Buchanan '33' St. No. 1 location. It should be noted that there is a diversity of ownership between the leases. However, the proposed production operation is in accordance with the applicable provisions and all necessary parties have been notified by certified mail.

Please find attached a lease commingling plat and a production facility schematic. Please note that the value of the oil will not be adversely effected.

If you have any questions or comments, please advise.

Sincerely,

Bryan L. Williams
Production Engineer
(505) 393-7106 ext. 212

(303) 373-7100 CXI. 212

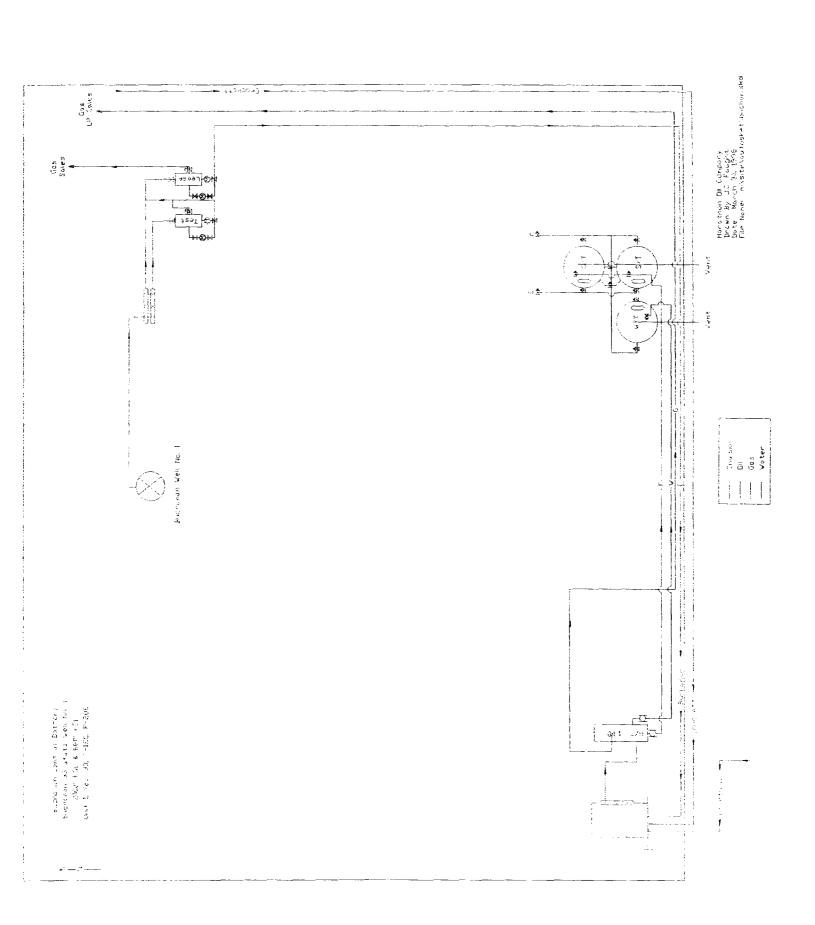
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David Crockett State 27 Lease Unit C.D.E.F.K.L.M&N W 172, Sec. 27, T-18S, R-28E James Buchanan State 33 Lease Unit A.B.G.H.L.J.D&P E 1/2, Sec. 33, T-185, R28E

Henry Courtman State 4 Lease Unit A.B.G.H.L.JD&P E 1/2 Sec. 4, Г-195, R-28E

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