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(CAC 731,110)



Carbon Energy Corporation Bonneville Fuels Corporation CEC Resources Ltd.

May 11, 2000

New Mexico Oil Conservation Division Attn: Mark Ashley 2040 South Pacheco Santa Fe, NM 87505 Phone (505) 827-8183

RE:

APPLICATION FOR ADMINISTRATIVE APPROVAL: SURFACE COMMINGLING

Lakeshore Fed. S. C. 10-2

Dear Mr. Ashley:

Bonneville Fuels Corporation is seeking Administrative Approval to commingle gas and oil production AT THE SURFACE from the Avalon Upper Penn Pool (9336'-9546' OA) with West Burton Flat Strawn/Avalon Morrow Pools (9724'-10848' OA) for the:

Lakeshore Fed. S. C. 10-2 Unit I @ 1750' FSL & 660' FEL, Section 10, T. 21S, R. 26E, Eddy Co., New Mexico.

The Burton Flat Strawn/ Avalon Morrow Pools will be commingled downhole before being commingled with the Avalon Upper Penn Pool (Cisco/Canyon formations) at the surface.

All gas, oil and water production from the Avalon Upper Penn Pool (producing up the casing/tubing annulus) shall be daily and separately metered and recorded. All combined Avalon Upper Penn/West Burton Flat/ Avalon Morrow oil, gas, and water production will then be metered and gauged. The Strawn/Morrow production (producing up the tubing) for gas, oil, and water shall then be determined by subtracting metered Avalon Upper Penn production from gross metered and gauged Upper Penn/ Strawn/Morrow production. See Exhibit #1 and Exhibit #2 for surface facility diagrams.

The oil and gas physical properties are listed below:

Pool	Oil Gravity (Deg. API)	Gas BTU Value
Avalon Upper Penn	60 (est.)	1100 BTU/SCF (est.)
W. Burton Flat Strawn	63	1100 BTU/SCF
Avaion Morrow	52	1075 BTU/SCF

The oil from all zones will be sold for the same per barrel price. The price for gas from different zones will vary slightly according to the BTU content.



