AN OCHSER A DIVISIO REALIND 132 DE 12: AM 8 52 a Division PLAINS PETROLEUM \ominus P F R A L L N G COMPANY

December 18, 1992

Mr. Ben Stone New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504-2088

RE: Application to Commingle Tank Batteries E. C. Hill Federal Lease Sections 34,35 - T23S - R37E Lea County, New Mexico

Dear Ben:

Per our conversation today, the following description is intended to help to clarify the past and current status of the wells to be commingled into one tank battery on the E. C. Hill Federal Lease, operated by Plains Petroleum Operating Company.

Initially, I would like to clarify the Federal lease number discrepancy noticed on the C-115 Forms that I faxed to you on Wednesday, December 16, 1992. The Federal lease numbers listed on the C-115 forms for the Teague-Paddock wells are incorrect, the Federal lease number should be the same as the Teague-Blinebry wells, 71-064118, to indicate a common lease for all E. C. Hill Federal wells.

Please note that the prior operator's naming convention for the E.C. Hill Federal wells was: 'B' for a Blinebry producer as in E. C. Hill 'B' Federal No. 1; and 'D' for a Devonian/Abo producer as in E. C. Hill 'D' Federal No. 1; and 'E' for Ellenburger producer. Subsequent to this naming convention, the E. C. Hill 'B' Nos. 1, 2 and 4 have been recompleted from the Teague-Blinebry zone to the Teague-Paddock zone in October 1990, October 1992, and November 1991, respectively. In addition, the E. C. Hill 'D' Federal No. 6 was recompleted from the Devonian and Abo to the Blinebry in April 1992. Conversely, the E. C. Hill 'B' Federal No. 5 was recompleted from the Blinebry to the Abo in September 1989.

Prior to the recompletion of the E. C. Hill 'B' Federal No. 1 from the Blinebry to the Paddock, the previous operator produced the well to the E. C. Hill 'B' Federal battery. After the recompletion, the well was produced to a separate tank battery, named the E.C. Hill 'B-1' battery. At this time, all of the Blinebry producers along with the E.C. Hill 'B' No. 5 were produced to the E. C. Hill 'B' battery and the remaining Devonian/Abo producers were produced to the E.C. Hill 'D' battery.

After the E. C. Hill Nos. B-4, D-6, and B-2 were recompleted, they wells were produced to the same tank batteries as they produced to before being recompleted, or in other words they were <u>not</u> produced to a different tank battery after being completed in a different zone.

Furthermore, the E.C. Hill 'B' Nos. 7 and 8, which were recently drilled in May and September 1992 respectively, have been produced to the E. C. Hill 'B' battery.

At this time, I believe the above description is an accurate account of the status of the E.C. Hill Federal wells and history of the particular wells producing to each tank battery. The following table summarizes the E.C. Hill Federal wells, their producing zone, well location, and tank battery prior to the consolidation of the E.C. Hill 'B-1', 'B', and 'D' tank batteries into the E.C. Hill Federal Lease tank battery.

Well Name	Producing Zone	Well Location	Tank Battery
E.C. Hill 'B' No. 1	Paddock	Sec. 34A-23S-37E	B-1
E.C. Hill 'B' No. 2	Paddock	Sec. 34H-23S-37E	В
E.C. Hill 'B' No. 3	Blinebry	Sec. 34B-23S-37E	В
E.C. Hill 'B' No. 4	Paddock	Sec. 34G-23S-37E	В
E.C. Hill 'B' No. 5	Abo	Sec. 34B-23S-37E	В
E.C. Hill 'B' No. 6	Blinebry	Sec. 35E-23S-37E	В
E.C. HILL 'B' No. 7	Blinebry	Sec. 34J-23S-37E	В
E.C. Hill 'B' No. 8	Blinebry	Sec. 340-23S-37E	В
E.C. Hill 'D' No. 1	Devonian	Sec. 34H-23S-37E	D
E.C. Hill 'D' No. 3	Abo	Sec. 35D-23S-37E	D
E.C. Hill 'D' No. 4	Devonian	Sec. 34A-23S-37E	D
E.C. Hill 'D' No. 5	Abo	Sec. 35E-23S-37E	D
E.C. Hill 'D' No. 6	Blinebry	Sec. 34I-23S-37E	D

If you should have any questions, please call me at (915)-683-4434.

Sincerely yours, Plains Petroleum Operating Company

a Nueler

Mark A. Nieberding ' Petroleum Engineer

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY December 22, 1992

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87504 (505) 827-5800

Plains Petroleum Operating Company 415 West Wall Street, Suite 1000 Midland, Texas 79701

Attention: Dominic J. Bazile Mark A. Nieberding

> RE: Unacceptable Production Commingling Practices

Dear Sirs:

Reference is made to your company's recent application to commingle production from several pools in the E.C. Hill Federal lease. In the process of my staff's review of the application, it became apparent that production commingling had indeed been implemented prior to applying for such authority. The fact that commingling occurred during the recompletion of several wells in the lease, does not relieve the operator of its responsibility to conduct operations in accordance with Division Rules and Regulations.

This letter will serve as notice that future similar operations by your company, will be conducted in strict compliance with said rules and regulations.

When there is any question as to procedure, please contact the Supervisor of the applicable OCD District Office for assistance.

chicerely, William J. LeMa Director WJL/BES/

cc: OCD - Hobbs



August 18, 1992

New Mexico Oil Conservation Division P. O. Box 1980 Hobbs, New Mexico 88240 Attention: Jerry Sexton

United States Department of Interior Bureau of Land Management P. O. Box 1778 Carlsbad, New Mexico 8820 Attention: Mr. Barry Hunt

Subject: Tank Battery Consolidation E. C. Hill Federal Lease Lea County, New Mexico

Gentlemen:

In regard to my discussion with Mr. Shannon Shaw and Ms. Evelyn Downs of your respective offices, I am attaching a Sundry Notice and supplemental information on the referenced subject.

Construction and modification of the batteries will begin immediately, following your approval.

Should you require additional information, please contact me at 915/683-4434.

Sincerely, PLAINS PETROLEUM OPERATING COMPANY

May 6 1

Dominic J. Bazile Petroleum Engineer

Attachments

Form 3160-5 (Novemi or 1983) (Formeriy 9-331) D	Form approved. Budget Bureau No. 1004-0135 Expires August 31, 1985 5. LEASE DEMIGNATION AND BEALAL NO. LC 064118 6. IP INDIAN, ALLOTTEE OR TRIBE NAME							
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2. NAME OF OFERATOR Plains Petroleur	8. FARM OR LEADE NA E. C. Hill '	B & D' Federal						
3. ADDERES OF OFERATOR			9. WBLL NO.					
415 W. Wall, Su	ite 1000, Midland, Texas 79	701						
4. LOCATION OF WELL (Repor See also space 17 below.) At surface	location clearly and in accordance with any	State requirements.*	11. SBC., T., E. M., OB SURVEY OR ADD	bry, Devonian <u>Paddock, Gl</u> orie BLE. AMD				
			Sec 35, T23S					
14. PERMIT NO.	15. ELEVATIONS (Show whether D	7, RT, GR, etc.)	12. COUNTY ON PARIS					
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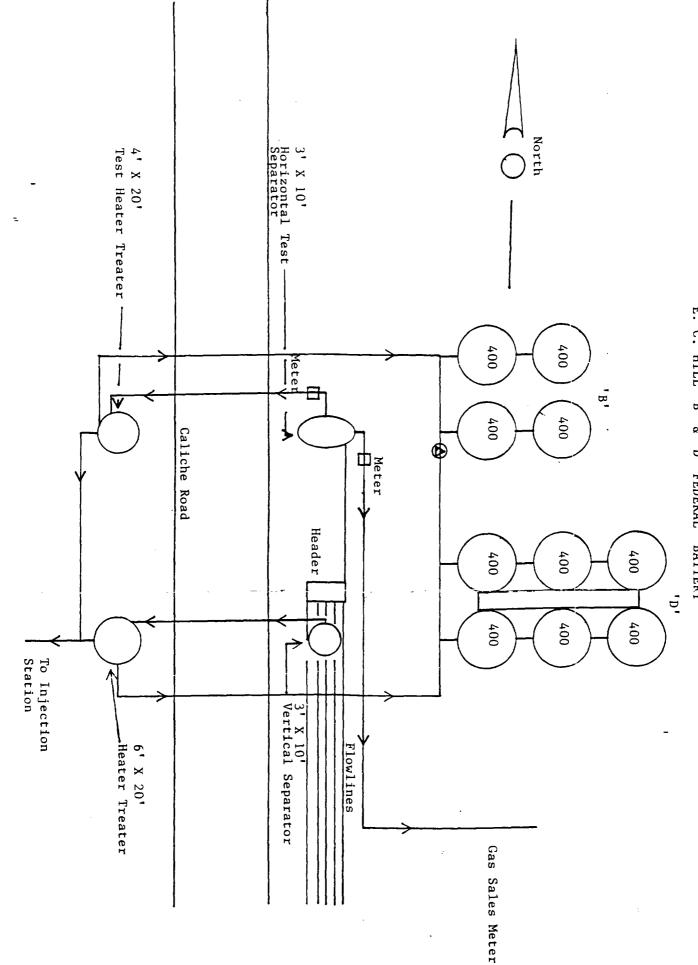
17. DESCRIDE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and gones pertinent to this work.)*

Plains Petroleum Operating Company proposes to commingle the E. C. Hill 'B' Federal and 'D' Federal Batteries to reduce expenses. The 'B' Battery presently receives production from the Blinebry and Paddock formations and the 'D' Battery production is from the Blinebry, ABO and Devonian. The majority of the production is in the 'D' Battery and receives a sour crude posting. By combining batteries and installing a well testing facility, a monthly well test report would be achieved for oil, gas, and water. Also, by blending the crude, the sulfur content may be reduced to receive sweet crude posting. This request is made in the interest of conservation of natural resources because only one pipeline would be in service and eliminate the risk of leaks occurring on two lines.

> 82.0 - 12.5 sem 5% AMEN CARTER FARMEN 82.5 - 12.5 Ben

18.	I hereby certify that the foregoing is true and correct SIGNED	TITLE _	Petroleum Engineer	DATE	8-18-92
	(This space for Federal or State office use)				
	APPROVED BY CONDITIONS OF APPROVAL, IF ANY:	TITLE _	·····	DATE _	

*See Instructions on Reverse Side



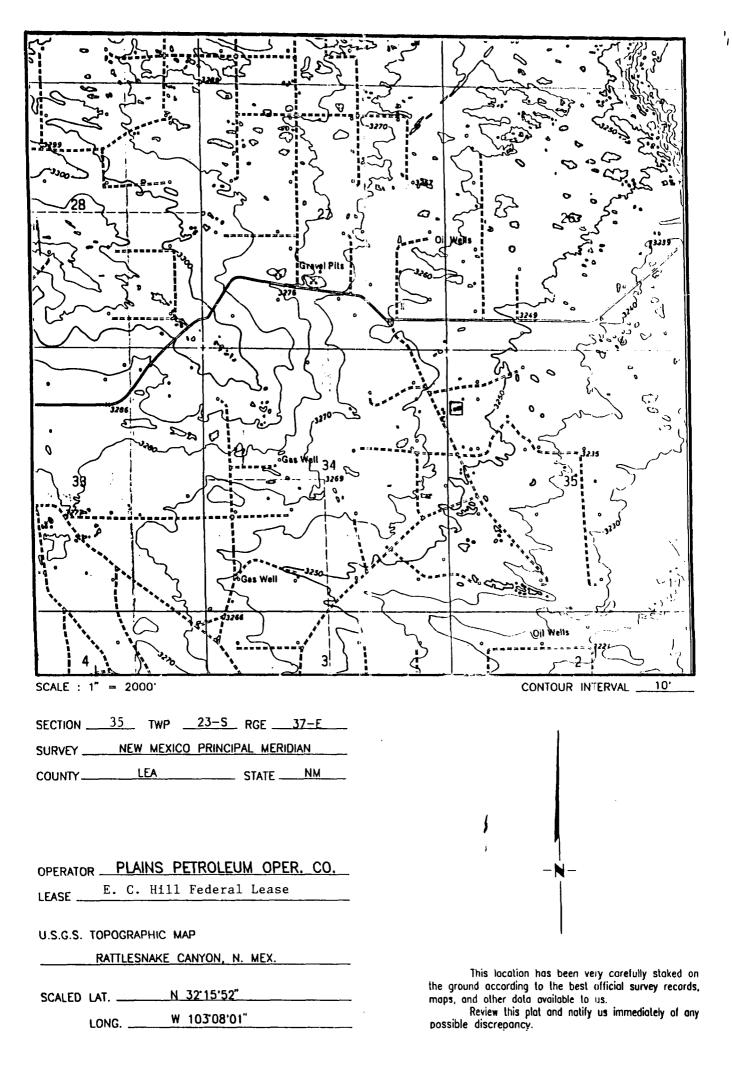
E. C. HILL 'B' & 'D' FEDERAL BATTERY

LOCATION & ELEVATION VERIFICATION MAP

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TOPOGRAPHIC LAND SURVEYORS

Surveying & Mapping for the Oil & Gas Industry

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EXHIBIT
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Property Attached to and made a part of that certain Assignment, Bill of Sale and Conveyance between Arch Petroleum Inc., as Assignor and Plains Petroleum Operating Company, as Assignee, dated $A_{V/VST} = 0.24$ (1991) but effective September 1, 1991 for all purposes. Field(s) Legal Description Lea County, New Mexico Book/Page Recorded Working Interest Net Revenue

FEDERAL E.C. HILL Paddock Teague Blinebry, Devonian and Teague S., Teague Teague Abo Section 34: feet subsurface and below in and beneath the covers those rights and formations from 3,800 Township 23 South, Range Carter Foundation Production Company, as entered into January 1, 1960 by and between Mexico: following described lands in Lea County, New Lessee insofar and only insofar as said lease the United States of America, as Lessor and That certain Oil and Gas Lease made and E/2 37 East, N.M.P.M. Serial No. Office, Las U.S. Land 064118 Mexico Cruces, New Filed at the 1.0000000 .8250000 Interest

Section 35: NW/4 and SW/4SW/4

Being 520 acres, more or less.

SUBJECT TO:

as Seller and Sid Richardson Carbon &That certain Gas Purchase Agreement made and entared into November 8, 1990 between Arch Petroleum Inc., isoline -pany, as Buyer.

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