SUNRAY MUD-CONTINENT OIL COMPANY MAIN OFFICE 1959 JUL (B) AM 8: 1 Hobbs, New Mexico P. O. Box 128

Oil Conservation Commission State of New Mexico 107 Mabry Hall Capitol Building Santa Fe, New Mexico

Re: Exception to Rule 5 (A) of the Special Rules and Regulations for the Blinebry Gas Pool, Lea County, New Mexico

Gentlemen:

Sunray Mid-Continent Oil Company respectfully requests that administrative approval be granted for assignment of an <u>80-acre non standard</u> gas proration unit to its State Lands "15" Well No. 2 in the Blinebry Gas Pool, Lea County, New Mexico, as an exception to Rule 5 (A) of the Special Rules and Regulations for the Blinebry Gas Pool as established under Order R-610.

Sunray's State Land "15" Well No. 2 located 660 feet from the South line and 1980 feet from the West line of Section 16, Township 21 South, Range 37 East, Lea County, was completed on April 24, 1947 as a Drinkard oil well with perforations from 6560 to 6650 feet. 13 3/8" surface casing was set at 334 feet with 300 sacks of cement. 8 5/8" intermediate casing was set at 2864 feet with 1600 sacks of cement. 5 1/2" production casing was set at 6699 feet with 300 sacks of cement. The total depth of the well was 6700 feet. It is planned to dually complete this well with the presently completed Drinkard oil zone flowing through the tubing and the Blinebry gas zone flowing through the casing - tubing annulus. By separate application, administrative approval of such proposed dual completion is being requested. An exception to Rule 5 (A) is requested since this lease does not include 160 acres. Under Rule 5 (B) the Secretary - Director of the Commission shall have authority to grant an exception to Rule 5 (A) without notice and hearing where application has been filed and where certain facts exist and certain provisions are complied with. In compliance with the requirement of this rule, Sunray alleges and states that the following conditions exist.

- The requested 80-acre non-standard gas proration unit consists of two 1. contiguous quarter-quarter sections with a common side between them.
- The requested 80-acre non-standard gas proration unit lies wholly with-2. in a single governmental quarter section.



3. The entire 80-acre unit may be reasonably presumed to be productive of gas from the Blinebry Gas Pool.

4. The length or width of this 80-acre unit does not exceed 2640 feet.

In accordance with the provision of Paragraph 6 of Rule 5 (B) it is hereby certified that the following operators have been notified by registered mail. Waivers have been requested and will be forward upon receipt. Upon receipt of the waivers we will forward same and elect the provisions of Paragraph 5 of Rule 5 (B):

Amerada Petroleum Corporation	N. B. Hunt
Drawer "D"	Andrews Highway
Monument, New Mexico	Odessa, Texas

Sunray asks that this request for administrative approval be granted, as such approval by the Commission will prevent waste, will protect correlative rights of all concerned and will serve the best interests of conservation. I hereby certify that the information contained in this application is true and complete to the best of my knowledge.

Yours very truly,

SUNRAY MID-CONTINENT OIL COMPANY

Statton

District Engineer

Subscribed and sworn to before me this 6th day of July, 1959.

for

Notary Public in and for Lea County, New Mexico

MY COMMISSION EXPIRES OCTOBER 8, 1961

Encl. CC: Amerada Petroleum Corp. N. B. Hunt NMOCC (2) Midland File

PLAT

SHOWING DRINKARD AND BLINEBRY WELLS IN VICINITY OF SUNRAY MID-CONTINENT - STATE LAND "15" LEASE LEA COUNTY, NEW MEXICO

DRINKARD WELL BLINERY WELL SCALE : 1"= 1500

OR # (DUAL COMPLETION) GAS WELLS GIRCLED IN RED OIL WELLS CIRCLED IN BLUE

