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**EXXON COMPANY, U.S.A.**  
POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

PRODUCTION DEPARTMENT  
SOUTHWESTERN DIVISION

May 16, 1988

Downhole Commingling  
Simultaneous Dedication  
N. G. Penrose Well No. 1  
Unit B, Section 13, T22S, R37E  
Lea County, New Mexico

New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, NM 87501

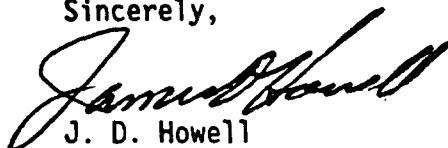
Attention: Mr. David R. Catanach

Exxon Corporation requests an exception to New Mexico Oil Conservation Division Rule 303-A to permit downhole commingling of production from the Blinebry Oil & Gas, Drinkard and Tubb Oil & Gas Pools in the captioned wellbore. Since we expect the Tubb Oil & Gas Pool completion to be gas, we also request simultaneous dedication of a 160 acre gas proration unit in the northeast quarter of Section 13 to N.G. Penrose Wells 1, 2 and 4. Please set this matter for consideration at the June 8, 1988 examiner hearing.

Well No. 1 is currently a marginal multiple completion in the Blinebry and Tubb. The Blinebry last tested 8 mcfgpd, but has not produced since 1977. The Tubb last tested 17 mcfgpd and appears to be loading with condensate. Exxon proposes to pull the current dual production equipment, add the Drinkard and install artificial lift to produce the remaining reserves in all three zones. Since separate testing of the zones before commingling would make the proposal prohibitively expensive, we ask that no such requirement be imposed.

A completed NMOCD Form C-102 for the Tubb is attached, as is the data described in Rule 303 (C)(2). All offset operators have been notified by copy of this letter and its attachments.

Sincerely,



J. D. Howell

JDH:jr  
Attachments

Certified Mail - w/attachments

c: Mr. James Bruce  
Offset Operators  
Mr. Jerry Sexton, NMOCD, Hobbs, NM  
2 copies to addressee

Exxon Corporation  
Exhibit No. 2A  
Cases 9398 & 9399  
June 8, 1988 docket

OFFSET OPERATORS TO  
EXXON'S N. G. PENROSE LEASE

Mabee Petroleum Corp.  
400 W. Illinois, Ste. 1500  
Midland, Texas 79701

Zachary Oil Operating Co.  
1212 Commerce Bldg.  
Fort Worth, Texas 76102

Marathon Oil Company  
Box 522  
125 W. Missouri St.  
Midland, Texas 79702

Fina Oil & Chemical Company  
6 Desta Drive  
Midland, Texas 79705

Texaco Producing, Inc.  
Box 3109  
500 N. Lorraine  
Midland, Texas 79701

Sun Exploration & Production Co.  
Box 1861  
Midland, Texas 79702

Sohio Petroleum Company  
10 Desta Drive, Ste. 600 West  
Midland, Texas 79705

J. H. Hendrix Corp.  
223 W. Wall  
525 Midland Tower Bldg.  
Midland, Texas 79701

Exxon Lse. No. 53159NEW MEXICO OIL CONSERVATION COMMISSION  
WELL LOCATION AND ACREAGE DEDICATION PLATForm C-102  
Supersedes C-128  
Effective 1-1-65

Federal Lse. No. \_\_\_\_\_

All distances must be from the outer boundaries of the Section.

Operator <b>Exxon Corporation</b>		Lessee <b>N. G. Penrose</b>		Well No. <b>1</b>
Unit Letter <b>B</b>	Section <b>13</b>	Township <b>22 South</b>	Range <b>37 East</b>	County <b>Lea</b>
<b>Actual Footage Location of Well:</b>				
660	feet from the <b>North</b>	line and	1,980	feet from the <b>East</b>

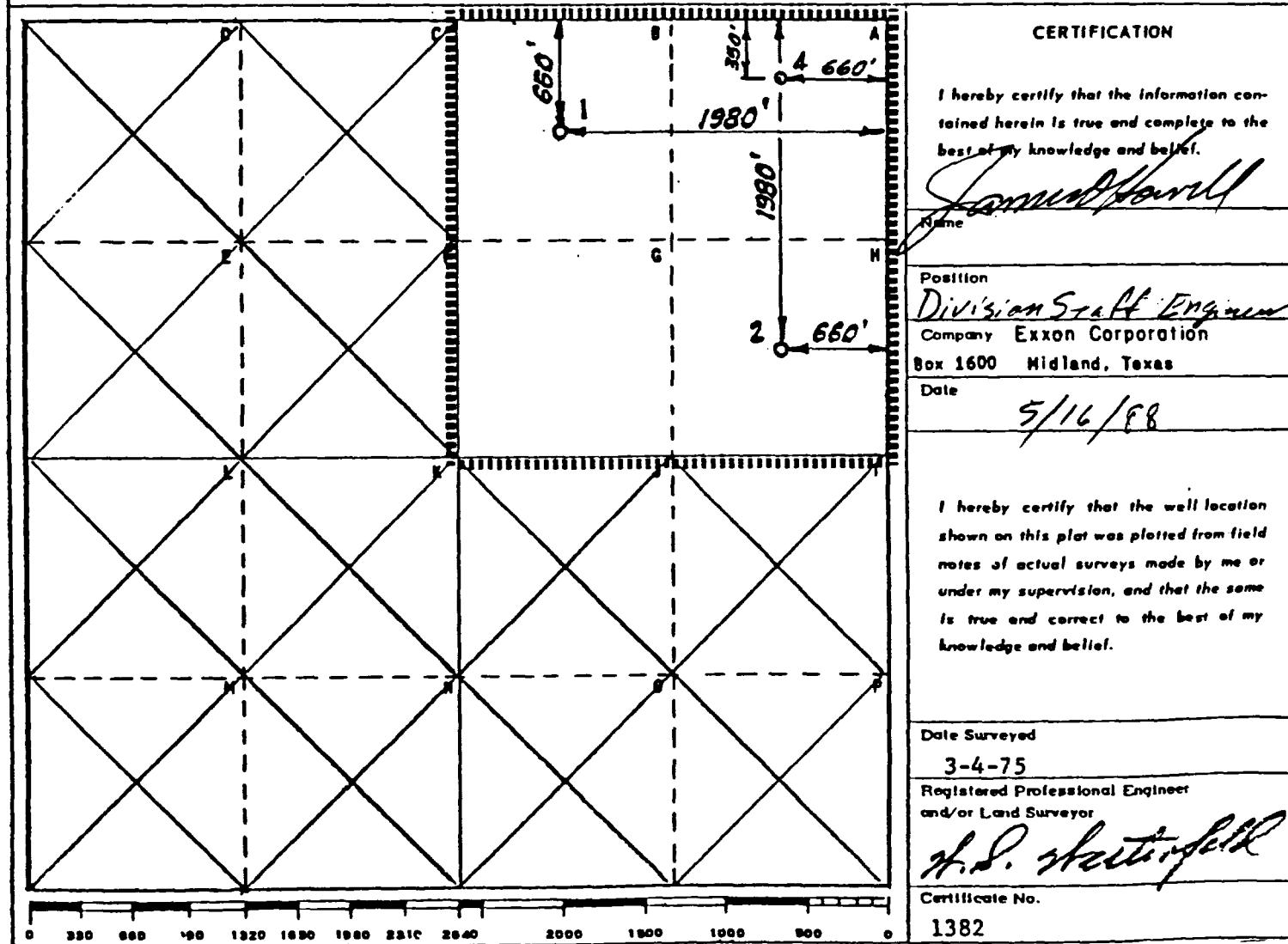
Ground Level Elev: <b>3,349' DF</b>	Producing Formation <b>Tubb</b>	Pool <b>Tubb Oil &amp; Gas</b>	Dedicated Acreage: <b>160</b>
			Acres

- Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
- If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
- If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communization, unitization, forced-pooling, etc?

Yes     No    If answer is "yes," type of consolidation \_\_\_\_\_

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.)

No allowable will be assigned to the well until all interests have been consolidated (by communization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.

Folio No. **1382**File No. **A-6858**

Attachment 2  
N. G. Penrose Well No. 1  
Downhole Commingling - Data Required

To obtain approval for downhole commingling, we have enclosed the following data pursuant to Rule 303 (C) (2) (a through j):

1. Exxon's name and address:

Exxon Corporation  
P. O. Box 1600  
Midland, TX 79702

2. Lease name, well number, well location, and name of pools to be commingled:

N. G. Penrose Well No. 1, Unit B, Section 13, T-22-S, R37-E, Lea County, New Mexico. Pools to be commingled: Blinebry Oil & Gas, Drinkard, and Tubb Oil & Gas.

3. A plat of the area showing the acreage dedicated to the well and the ownership of all offsetting leases:

Attached.

4. A 24-hour productivity test on Division Form C-116 showing the amount of oil, gas, and water produced from each zone:

Tests for the Blinebry and Tubb on Form C-116 are attached. The Drinkard has not yet been perforated. Expected Drinkard production is 3.5 BOPD and 68.3 mcfpd.

5. A production decline curve for zones showing that for a period of at least one year a steady rate of decline has been established for each zone which will permit a reasonable allocation of the commingled production to each zone for statistical purposes:

Decline curves for the Blinebry and Tubb zones are attached. Note that the Blinebry has not produced since 1977. Test data indicates that this zone is capable of producing 8 mcfpd. Allocations shown in Item 9 are based on actual production where available and appropriate or on 1986 average per well production within the immediate area.

6. A current bottom hole pressure for each zone capable of flowing:

The well currently flows small amounts of gas from the Tubb but appears to be logged up with condensate and most probably will require artificial lift to properly produce. Measured shut-in bottomhole pressure is 487 psia for the Tubb, 488 psia for the Blinebry (estimated from static fluid level in the N. G. Penrose #1) and 1416 psia for the Drinkard (estimated from the static fluid level in the N.G. Penrose #3). When adjusted to a common average datum of 2776 feet subsea, the Blinebry pressure is 668

psia, the Tubb pressure is 474 psia, and the Drinkard pressure is 1246 psia. Although the lowest pressured zone is less than 50% of the pressure in the highest pressured zone, no crossflow will occur since the fluids will be artificially lifted.

7. A description of the fluid characteristics of each zone showing that the fluids will not be incompatible in the wellbore:

Produced fluids are already surface commingled with no compatibility problems.

8. A computation showing that the value of the commingled production will not be less than the sum of the values of the individual streams:

All of the crude and condensate currently produced from the Blinebry Oil & Gas, Tubb Oil and Gas, Drinkard and Granite Wash pools on this lease is already being surface commingled into one common stock tank, and sold as a mixture. Although unrelated to downhole commingling, increased gas production rates expected from artificial lifting the fluids may disqualify these completions from stripper gas classification.

9. A formula for the allocation of production to each of the commingled zones and a description of the factors or data used in determining such a formula:

The following allocation percentages are suggested based upon the ratio of production from each zone:

	Expected Oil Production Oil (BOPD)	Expected Gas Production Gas (MCFPD)
Blinebry Oil & Gas	4.6 (52%)	84.9 (41%)
Drinkard	3.5 (39%)	68.3 (33%)
Tubb Oil & Gas	0.8 (9%)	54.8 (26%)
Commingled Total	8.9 (100%)	208.0 (100%)

10. A statement that all offset operators and, in case of a well on Federal land, the United States Geological Survey, has been notified in writing of the proposed commingling:

By copy of this letter, we are notifying the offset operators of this proposed commingling.

11. In addition, working interest and royalty interest ownership in all zones are the same.

N. G. Penrose Well No. 1  
Unit B, Section 13, T22S, R37E  
Lea County, New Mexico

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STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT

SANTA FE, NEW MEXICO 87501

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Form C-116  
Revised 10-1-74

GAS - OIL RATIO TESTS TEST PERIOD - AUG. 5-9, 1974

Operator: Exxon Corporation  
Address: P. O. Box 1600 Midland, Texas 79702

LEASE NAME	WELL NO.	LOCATION			TYPE OF TEST - (X)	SCHEDULED	DAILY ALLOWABLE PRESSURE	CHOOSE TEST SIZE PRESS.	TEST	DATE OF TEST	GAS - OIL RATIO	CURT/BBL	SPECIFIC GRAV.	WATER IN OIL	PROD. DURING TEST	GAS - OIL RATIO
		E	N	S												
NEW MEXICO 'V' STATE	11	K	10	21	37	10/1/87	A				24	21	35.0	5	21	5600
	5	M	10	21	37	10/11/87	F				24	21	35.0	5	21	5600
NEW MEXICO 'S' STATE	20	E	2	22	37	8/5/87	F				24	21	35.0	5	21	5600
	13	B	2	22	37	10/28/87	F				24	21	35.0	5	21	5600
	23	P	2	22	37	10/28/87	F				24	21	35.0	5	21	5600
N. G. PENROSE	1	B	13	22	37	10/1/87	F				24	21	35.0	5	21	5600
N.G. PENROSE	2	H	13	22	37	10/29/87	F				24	21	35.0	5	21	5600
TUBB GAS. COM.	1	/	0	10	21	10/9/87	F				24	21	35.0	5	21	5600

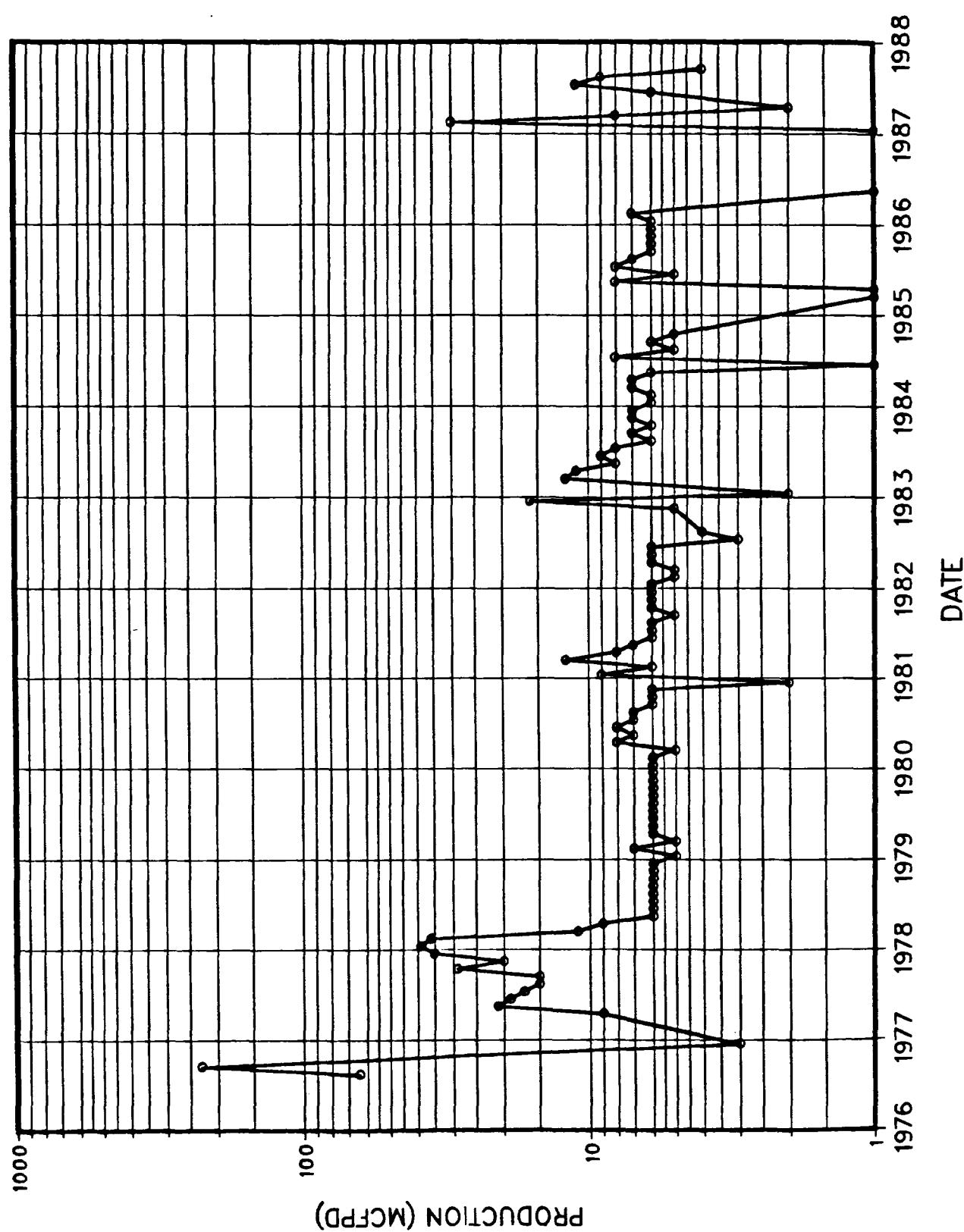
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No well will be assigned an allowable greater than the amount of oil produced on the previous test. During general ratio test, each well shall be treated as a ratio and according the law will affect the oil produced by more than 25 percent. Operator is encouraged to take advantage of this 25 percent tolerance in order that wells can be assigned to different allowable when authorized by the Division.  
Gas volumes must be reported in NCP measured at a pressure base of 15,000 psia and a temperature of 60° F. Specific gravity base will be 0.60.  
Report existing pressure in bars of testing pressure for any well producing through casing.  
Well original and any copy of this report to the director office of the New Mexico Oil Conservation Division in accordance with Rule 201 and appropriate pool rules.

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

*Charles J. O'Conor*  
(Signature)  
Oil Steward Officer Gas  
11-3-87  
915/696-4491

N G PENROSE #1  
TUBB PRODUCTION



N G PENROSE #1  
BLINBRY PRODUCTION

