CIL CONSERVATION COMMISSION P. O. BOX 871 SANTA FE, NEW MEXICO



July 7, 1959

Pan American Petroleum Corporation P. C. Box 68 Mobbs, New Mexico

Attention: Mr. J. W. Brown

No: Request for Exemption, Deviation Tests

Gentlemen:

Meference is made to your letter of July 2, 1959, wherein you requested exemption to Bale 111 - Deviation Tests, for your U.S.A. Malco Mefimeries "G" Well No. 5, Empire-Abo Field, Eddy County, New Mexico.

Your letter of April 16, 1959, and of May 21, 1959, are also noted at this time, as well as our letter of April 20, 1959. All related to the same general subject - the Bule 111 requirement to run a directional survey on a well when the deviation from the vertical in any 500-foot interval averages more than five degrees.

This office is of the opinion that a directional survey is unnecessary on any well which has such a deviation from the vertical, provided that Totoo or other deviational surveys are made throughout the course of drilling the well, and the cumulative drift according to such deviational surveys, if assumed to be all in one direction and toward the mearest outer boundary of the provation unit on which the well is located, shows conclusively that the bottom of the hole is on the same tract as the surface location.

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