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December 17, 1974

Oil Conservation Commission
State of New Mexico
P. O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mr. A. L. Porter

Re: Administrative Approval
Tubingless completion - Penn Federal No. 1
1980' FNL & 1980' FWL of Sec. 31, T-20-S, R-30-E
Lea County, New Mexico

Gentlemen:

The subject well was drilled and subsequently plugged and abandoned by Texas International Petroleum Corporation on September 17, 1974 after testing the Morrow formation at a total depth of 12,590'.

Pennzoil Company plans to re-enter this well and make a completion attempt in the Atoka zone at a total depth of 11,900'. Attached are copies of the U.S.G.S. Forms 9-330 and 9-331 that were submitted by Texas International which shows the casing and cement plugs in the well at the current time.

Pennzoil Company respectfully requests Administrative Approval to set 2 7/8" tubing for production casing and submit following data in support of this request:

1. The Atoka zone does not produce corrosive liquid to the best of our knowledge.
2. The maximum bottom hole pressure expected will not exceed the working pressure of the 2 7/8" tubing (X-line) that will be cemented at approximately 11,900'.
3. The well will be a single completion.
4. There is no known Atoka production within one mile of the proposed re-entry location.

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