



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 7, 2000

Conoco Inc.
P.O. Box 2197
Houston, Texas 77252-2197

Attention: Ms. Deborah Moore

Re: Form C-107-A
San Juan 28-7 Unit No. 48
Unit L, Section 21, T-28N, R-7W
Rio Arriba County, New Mexico



Dear Ms. Moore:

Upon review of the C-107-A for the San Juan 28-7 Unit No. 48, it was determined that Conoco Inc. did not provide sufficient information with regards to the proposed allocation of production from each of the commingled zones. I assume that the Mesaverde production will be determined by the production forecast, however, there is no indication of how production will be determined and allocated between the Fruitland Coal and Pictured Cliffs formations.

Please provide additional information regarding the allocation of production between the Fruitland Coal and Pictured Cliffs formations, and an explanation of how this proposed allocation will protect the correlative rights of the interest owners within the San Juan 28-7 Unit.

Your application will be processed upon receipt of the requested data.

Sincerely,

David Catanach
Engineer

Xc: OCD-Aztec
Bureau of Land Management-Farmington