

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC NM 87410
(505) 334-8178 FAX: (505) 334-6170
http://emnrd.state.nm.us/ocd/District III/3distric.htm

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

August 11, 1999

Ms Yolanda Perez Conoco, Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500

Re:

FC State Com #24, M-36-30N-12W, API # 30-045-28177

Application For Tubingless Exception To Rule 107

Dear Ms Perez:

Your request to pull tubing in the referenced well and install a casing plunger is hereby granted. This action may produce gas and lift oil and water more efficiently that could result in the recovery of additional reserves. If the plunger is removed after installation, tubing must be re-run before the well is allowed to produce.

If you have any questions, please contact this office.

Yours truly,

Ernie Busch

District Geologist/Deputy O&G Inspector

Exing Busel

EB/mk

Xc:

Roy Johnson-Santa Fe

Well File

FCSTATE COM#24. tbx

TECHET WE WAS

CONOCO INC KAY MADDOX 10 DESTA DR STE 100W MIDLAND TX 79705

June 21, 1999

Mr. Ernie Busch New Mexico Oil Conservation Division – Aztec District Office 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Application for Tubingless Exception to Rule 107

Redfern #5 API # 30-045-07554 Section 10, T-28-N, R-11-W, N

Dustin #1 API 30-045-08708 Section 6, T-29-N, R-12-W, J

API # 30-045-28177 Section 36, T-30-N, R-12-W, M

Dear Mr. Busch.

An exception to Rule 107, requiring the above listed wells to be produced with tubing, is requested. It is believed that producing the well tubingless will increase the producing rate efficiency and maximize recovery from this well. The purpose for removing the tubing from this well is to allow the use of the new innovative casing plunger that allows continuos gas flow while at the same time automatically lifting produced oil and water volumes.

Whereas requests and application for tubingless completions have typically been for newer, high rate gas wells in an effort to reduce the flow restrictions of tubing, these three wells are marginal low rate producers whose production has been restricted by fluid loading. Due to overloading and downtime the referenced wells are not producing at their maximum ability.

The discovery of the new innovative casing plunger seems to offer a more efficient producing solution. Conoco, Inc. was granted permission to use this tool on the Ohio #1 By Order TX 278 dated 12/15/97. This new innovative approach (to the San Juan) for increasing the producing efficiency and ultimate recovery of mature depleted gas wells has been extremely successful as evidenced in the Ohio #1.

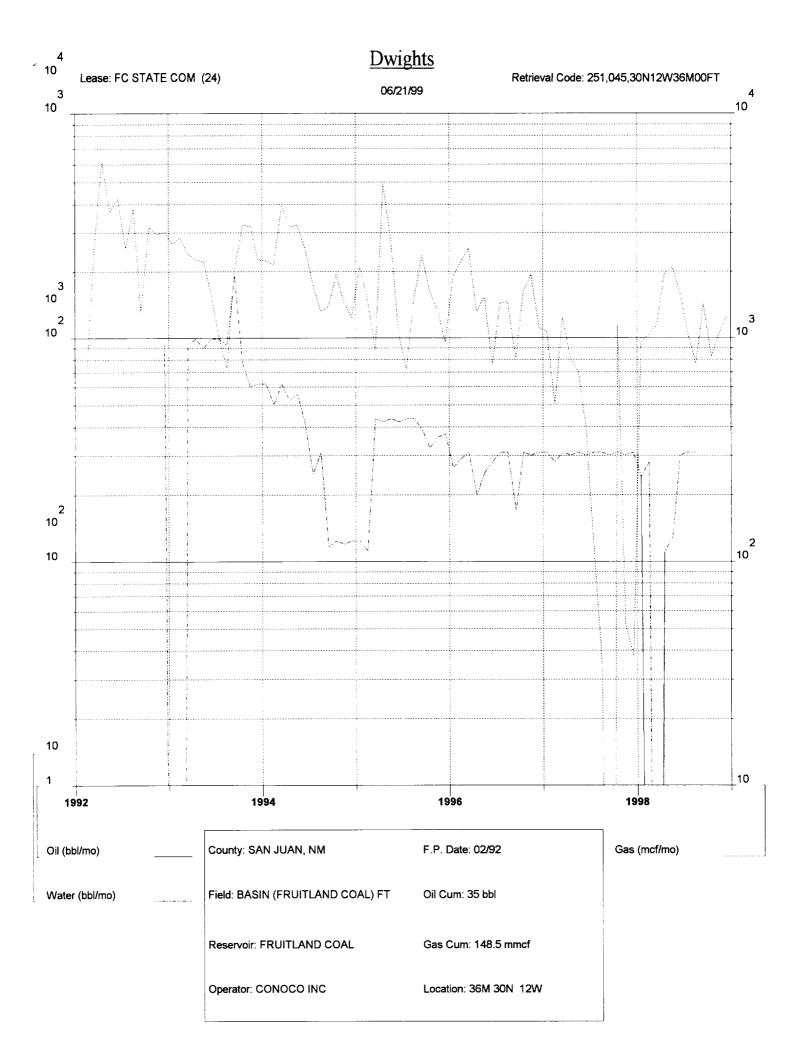
To configure the wellbores for use with the casing plungers the production tubing will be removed and the casing pressure tested for leaks and drift. A casing scraper will be used to clean out the interior casing surface and then re-pressure tested. A downhole collar stop and casing plunger catcher will be installed in the first collar above the top perforation (refer to wellbore schematic). At the surface, the wellhead will be configured with a plunger catcher and a bypass with an automated controller. The plunger is automatically dropped when a fluid loading problem is detected by the surface controller while allowing continuous gas flow through its internal bypass valve.

Conoco, Inc. requests that they be granted an exception to Rule 107 for the above referenced wells to continue this tubingless operation to fully optimize and economically produce the three mature and depleted Dakota gas wells. If there are additional questions regarding this application please call me at (915) 686-5798.

Sincerely yours,

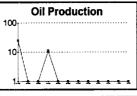
Kay Maddox

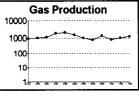
Regulatory Agent - Conoco, Inc.

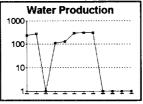


Lease:	FC STATE COM	Well #:	24	FP Date:	92-02
Field:	BASIN (FRUITLAND COAL) FT	Location:	36M 30N 12W	LP Date:	98-12
Operator:	CONOCO INC	Liquid Cum:	35 bbls	Liq Since:	FPDATE
RCI#:	251,045,30N12W36M00FT	Gas Cum:	148,540 mcf	Gas Since:	FPDATE
API#:	30-045-28177-00	Status:	ACT GAS		

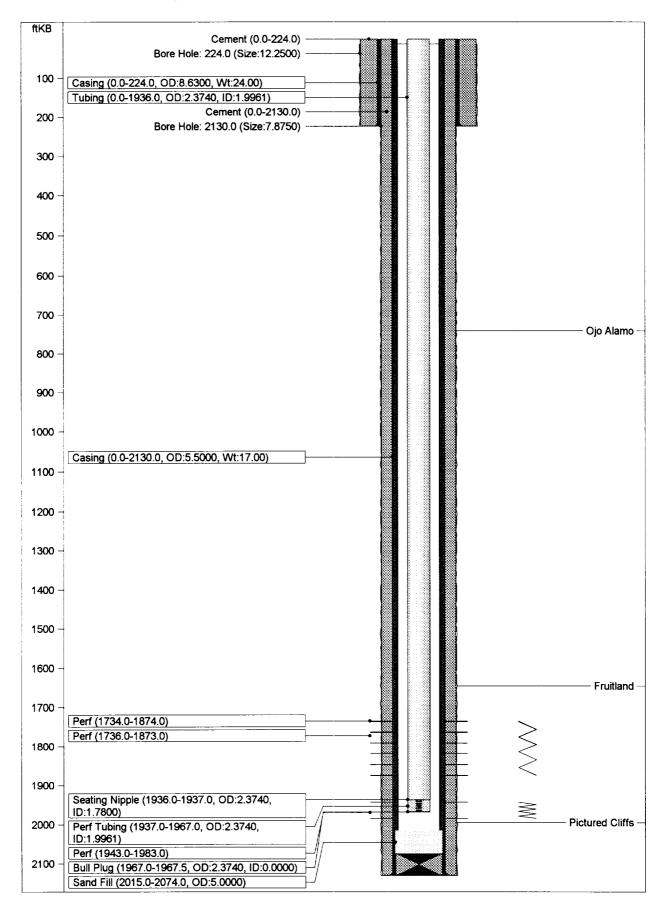
WELLS	WATER, BBLs	GAS, MCF	OIL, BBLs	DATE
1	240	954	24	01/1998
1	280	1,035	0	02/1998
1	0	1,141	0	03/1998
1	110	1,963	11	04/1998
1	130	2,092	0	05/1998
1	300	1,600	0	06/1998
1	310	1,053	0	07/1998
1	310	769	0	08/1998
1	0	1,418	0	09/1998
1	0	823	0	10/1998
1	0	1,050	0	11/1998
1	0	1,248	0	12/1998
	1,680	15,146	35	Total







FC STATE COM 24 (LFW 10/24/97)



FC STATE COM 24 (LFW 10/24/97)

	M 24 (LFW 10/24/9					
API Code		0452817700	Field Code	676394377		
TD		130.0 ftKB	Basin	SAN JUAN BASIN		
<u> </u>		074.0 ftKB	Basin Code	580		
State		ew Mexico	Permit	27-Aug-90		
County		AN JUAN	Spud	09-Oct-90		
		n Juan O.U.	Finish Drl	11-Oct-90		
Permit No.		Coal	Completion	30-Oct-90		
TD Measured 2		2130 ftKB	Abandon			
Reservoir	Fr	uitland Coal				
Field	BASIN F	RUITLAND COAL				
Event History						
Date	Event	Description				
31-Aug-93	Tub Run		ig ID: 0.0000in 2.3740 in P	erf Tubing, Jnts: 1, ID: 1.9961in, 2.374		
or mag co	1 40 1 (41)	in Seating Nipple	in Seating Nipple, ID: 1.7800in, 2.3740 in Tubing, Jnts: 62, ID: 1.9961in			
30-Aug-93	Cas Run		5.0000 in Sand Fill, ID: 5.0000in			
20-Nov-90	Note	Initial Potential: P	Initial Potential: P 78 MCFGPD on 1 1/2 ck, 0 B/O, 105 BWPD, TP 110 CP110			
22-Oct-90	Stim/Treat	Fracture, 1734.0	Fracture, 1734.0 - 1874.0ftKB			
22-Oct-90	Perf	1734.0 - 1874.0f	1734.0 - 1874.0ftKB, 4.0/ft			
21-Oct-90 Stim/Treat		Fracture, 1736.0	Fracture, 1736.0 - 1873.0ftKB			
			1736.0 - 1873.0ftKB, 4.0/ft			
21-Oct-90	Perf	1736.0 - 1873.0f	tKB, 4.0/ft			
		1736.0 - 1873.0f Fracture, 1943.0				
21-Oct-90	Perf		- 1983.0ftKB			
21-Oct-90 20-Oct-90	Perf Stim/Treat	Fracture, 1943.0 1943.0 - 1983.0f	- 1983.0ftKB tKB, 4.0/ft	00in, 8/30/83 TOF @ 2015' (59' Fill)		
21-Oct-90 20-Oct-90 20-Oct-90	Perf Stim/Treat Perf	Fracture, 1943.0 1943.0 - 1983.0f Cement Plug, 20 GR-CBL, 30.0 - 2	- 1983.0ftKB IKB, 4.0/ft 74.0 - 2130.0ftKB, OD: 5.00 2073.0ftKB, Petro			
21-Oct-90 20-Oct-90 20-Oct-90 14-Oct-90	Perf Stim/Treat Perf Other Run	Fracture, 1943.0 1943.0 - 1983.0f Cement Plug, 20 GR-CBL, 30.0 - 2	- 1983.0ftKB tKB, 4.0/ft 74.0 - 2130.0ftKB, OD: 5.00			
21-Oct-90 20-Oct-90 20-Oct-90 14-Oct-90 14-Oct-90	Perf Stim/Treat Perf Other Run Log	Fracture, 1943.0 1943.0 - 1983.0f Cement Plug, 20 GR-CBL, 30.0 - Production Casin 5.5000 in Casing	- 1983.0ftKB tKB, 4.0/ft 74.0 - 2130.0ftKB, OD: 5.00 2073.0ftKB, Petro ig, Top Found At 0.0ftKB, W i, Jnts: 49, ID: 4.8900in	ith 525sx		
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21-Oct-90 20-Oct-90 20-Oct-90 14-Oct-90 14-Oct-90 12-Oct-90 11-Oct-90	Perf Stim/Treat Perf Other Run Log Cas Cmnt Cas Run Log	Fracture, 1943.0 1943.0 - 1983.0f Cement Plug, 20 GR-CBL, 30.0 - 2 Production Casing 5.5000 in Casing GR-C, 224.0 - 2 2128.0ftKB, Atlat 7.8750in, Depth Surface Casing,	- 1983.0ftKB tKB, 4.0/ft 74.0 - 2130.0ftKB, OD: 5.00 2073.0ftKB, Petro 19, Top Found At 0.0ftKB, W 1, Jnts: 49, ID: 4.8900in 129.0ftKB, Atlas, DEN/NEU, 5 2130.0ftKB Top Found At 0.0ftKB, With	224.0 - 2129.0ftKB, Atlas, IND, 224.0		
21-Oct-90 20-Oct-90 20-Oct-90 14-Oct-90 12-Oct-90 12-Oct-90 11-Oct-90	Perf Stim/Treat Perf Other Run Log Cas Cmnt Cas Run Log Bore Hole	Fracture, 1943.0 1943.0 - 1983.0f Cement Plug, 20 GR-CBL, 30.0 - 2 Production Casing 5.5000 in Casing GR-C, 224.0 - 2 2128.0ftKB, Atlat 7.8750in, Depth Surface Casing,	- 1983.0ftKB tKB, 4.0/ft 74.0 - 2130.0ftKB, OD: 5.00 2073.0ftKB, Petro rg, Top Found At 0.0ftKB, W I, Jnts: 49, ID: 4.8900in 129.0ftKB, Atlas, DEN/NEU, s 2130.0ftKB	224.0 - 2129.0ftKB, Atlas, IND, 224.0		