

CASE 3621: Application of MOBIL
for an amendment to COMMISSION
RULE 1103 A.

Case Number

3621

Application
Transcripts.

Small Exhibits

ETC.

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION OF NEW MEXICO FOR
THE PURPOSE OF CONSIDERING:

CASE No. 3621
Order No. R-3292

APPLICATION OF MOBIL OIL CORPORATION
FOR AN AMENDMENT TO COMMISSION RULE
1103 A.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on July 26, 1967, at Santa Fe, New Mexico, before Examiner Elvis A. Utz.

NOW, on this 7th day of August, 1967, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant, Mobil Oil Corporation, seeks the amendment of Rule 1103 A of the Commission Rules and Regulations to eliminate the requirement for filing Form C-103 as a notice of intention to acidize, fracture, or clean out previously completed wells.

(3) That the information needed by the Commission concerning acidizing, fracturing, or cleaning out previously completed wells can be obtained from Form C-103 filed as a subsequent report.

(4) That in order to ease the administrative burden upon operators and the Commission, thereby preventing economic waste, Rule 1103 A of the Commission Rules and Regulations should be amended to eliminate the requirement for filing Form C-103 as a notice of intention to acidize, fracture, or clean out previously completed wells.

-2-

CASE No. 3621
Order No. R-3292

IT IS THEREFORE ORDERED:

(1) That subsection (6) of Rule 1103 A, Form C-103 as a Notice of Intention, of the Commission Rules and Regulations is hereby abolished.

(2) That subsection (5) of Rule 1103 A, Form C-103 as a Notice of Intention, of the Commission Rules and Regulations is hereby amended to read in its entirety as follows:

"(5) Performing remedial work on a well which, when completed, will affect the original status of the well. (This shall include making new perforations in existing wells or squeezing old perforations in existing wells, but is not applicable to new wells in the process of being completed nor to old wells being deepened or plugged back to another zone when such recompletion has been authorized by an approved Form C-101, Application for Permit to Drill, Deepen, or Plug Back, nor to acidizing, fracturing, or cleaning out previously completed wells, nor to installing artificial lift equipment.)"

(3) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION


DAVID F. CARGO, Chairman


GUYTON B. HAYS, Member


A. L. PORTER, Jr., Member & Secretary



esr/

GOVERNOR
DAVID F. CARGO
CHAIRMAN

State of New Mexico
Oil Conservation Commission



LAND COMMISSIONER
GUYTON B. HAYS
MEMBER

P. O. BOX 2088
SANTA FE

STATE GEOLOGIST
A. L. PORTER, JR.
SECRETARY - DIRECTOR

August 7, 1967

Mr. James Sperling
Modrall, Seymour, Sperling, Roehl
and Harris
Attorneys at Law
Post Office Box 466
Albuquerque, New Mexico

Re: Case No. 3621
Order No. R-3292
Applicant: MOBIL OIL CORPORATION

Dear Sir:

Enclosed herewith are two copies of the above-referenced Commission order recently entered in the subject case.

Very truly yours,

A. L. Porter, Jr.
A. L. PORTER, Jr.
Secretary-Director

ALP/ir

Carbon copy of order also sent to:

Hobbs OCC x

Artesia OCC x

Aztec OCC x

Other: _____

Case 3621

Hearings 7-26-67

Res. 7-28-67

1. Grant Mobil their request for
a rule change of General Rule 1103A

5 + 6

2. Delete Para 5 + 6 of 1103A. and insert
(5) as marked on Exhibit 1 (attached).

The effect of this change will be to
~~eliminate~~ ^{it} ~~require~~ eliminate the
requirement for notice of intention
on old wells for. Clean out, fracture
treatments, acidizing, & artificial lift.

Thos. J. [Signature]

PAN AMERICAN PETROLEUM CORPORATION

OIL AND GAS BUILDING P. O. BOX 1410

FORT WORTH, TEXAS—76101

July 21, 1967

D. L. RAY
DIVISION ENGINEER

File: GHF-368-986.510.1

Subject: Case 3621, Examiner Hearing Docket
July 26, 1967

New Mexico Oil Conservation Commission
Mr. A. L. Porter, Jr.
Secretary-Director
Post Office Box 2088
Santa Fe, New Mexico

Dear Sir:

Mobil Oil Corporation has made application for an amendment to Commission Rule 1103A. This application is scheduled for the July 26, 1967, examiner hearing as Case 3621. Mobil will seek to amend Rule 1103A to eliminate the requirement for filing Form C-103 as a notice of intention to acidize, fracture, or clean out previously completed wells. Pan American Petroleum Corporation supports Mobil in their application since it is felt that the elimination of the above requirement will in no way weaken the intent of Rule 1103A but will eliminate a considerable amount of paper work for both the Commission and operators in New Mexico.

Yours very truly,

D. L. Ray

BHB:kkh

cc: Mobil Oil Corporation
Box 663
Midland, Texas
Attn: Mr. Pat Kelly

TEXACO
INC.

PETROLEUM PRODUCTS

DOMESTIC PRODUCING DEPARTMENT
MIDLAND DIVISION



P. O. BOX 3109
MIDLAND, TEXAS 79704

July 20, 1967

CASE NO. 3621
EXAMINER HEARING WEDNESDAY, JULY 26, 1967
COMMISSION RULE 1103 A

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

Attention: Mr. A. L. Porter, Jr.

Gentlemen:

Texaco Inc. concurs with the recommendations made by Mobil Oil Corporation at Case 3621, Docket No. 22-67 for an amendment to Commission Rule 1103 A that will provide for the elimination of the present requirement for filing form C-103 as a notice of intention to acidize, fracture or clean out previously completed wells. Texaco Inc. respectfully requests your approval of this application for Mobil Oil Corporation.

Yours very truly,

A handwritten signature in cursive script, appearing to read "C. L. Whigham".

C. L. Whigham
Division Proration Engineer

CLW-MM

cc: Mobil Oil Corporation
Box 633
Midland, Texas 79701
Attn: Mr. I. B. Stitt

MAIN OFFICE

'67 JUL 21 AM 9 3



PHILLIPS PETROLEUM COMPANY

BARTLESVILLE, OKLAHOMA 74003

EXPLORATION AND PRODUCTION DEPARTMENT

July 14, 1967

Case 3621 - Application of Mobil Oil Corporation
to Amend Rule 1103-A so as to Eliminate the Re-
quirement for Filing Form C-103 As A Notice of
Intention to Acidize, Fracture or Clean Out
Previously Completed Wells

New Mexico Oil Conservation Commission
Post Office Box 871
Santa Fe, New Mexico

Attention Mr. A. L. Porter, Jr.

Gentlemen:

Phillips Petroleum Company desires to express its concurrence in the subject application and urges the Commission to authorize the amendment to Rule 1103-A as requested by Mobil Oil Corporation.

It is believed that the requirements which Mobil seeks to eliminate are an unnecessary burden on the industry and serve no useful purpose for the Commission.

All information pertaining to such operations could be more effectively elicited by a report on Form C-103 reflecting the completion of the work, which could be filed simultaneously with a new Form C-116 or C-122.

Very truly yours,

Shofner Smith

Shofner Smith
Production Director

OPN:dg

MAIN OFFICE 000

'67 JUL 17 AM 8 11

J. R. MODRALL
JAMES E. SPERLING
JOSEPH E. ROEHL
GEORGE T. HARRIS, JR.
DANIEL A. SISK
LELAND S. SEDBERRY, JR.
ALLEN C. DEWEY, JR.
FRANK H. ALLEN, JR.
JAMES P. SAUNDERS, JR.

JAMES A. PARKER
HENRY G. COORS
JOHN R. COONEY
KENNETH L. HARRIGAN
PETER J. ADAMS
DALE W. EK

LAW OFFICES OF
MODRALL, SEYMOUR, SPERLING, ROEHL & HARRIS

SIMMS BUILDING

P. O. BOX 466

ALBUQUERQUE, NEW MEXICO 87103

JOHN F. SIMMS (1885-1954)
AUGUSTUS T. SEYMOUR
(1907-1965)

TELEPHONE 243-4511
AREA CODE 505

June 26, 1967

MAIN OFFICE 000

Case 3627 JUN 27 AM 8 44

Mr. A. L. Porter, Jr.
Secretary-Director
New Mexico Oil Conservation Commission
Box 2088
Santa Fe, New Mexico

RE: In the Matter of the Application
of Mobil Oil Corporation for
Amendment of Commission Rule
1103A

Dear Mr. Porter:

Enclosed please find original and two copies of Application
made by Mobil Oil corporation in regard to the above matter.

It will be appreciated if you will advise the date of the
hearing.

Thank you.

Very truly yours,

JAMES E. SPERLING

JES: ng
Encls: a/s
cc: Mr. F. L. Hart
Mobil Oil Corporation
Box 633
Midland, Texas 79701

DOCKET MAILED

Date 7-14-67

CLASS OF SERVICE
This is a fast message unless its deferred character is indicated by the proper symbol.

WESTERN UNION TELEGRAM

W. P. MARSHALL
CHAIRMAN OF THE BOARD

R. W. McFALL

SYMBOLS
DL=Day Letter
NL=Night Letter
LT=International Letter Telegram

The filing time shown in the date line on domestic telegrams is LOCAL TIME at point of origin. Time of receipt is LOCAL TIME at point of destination

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NEW MEXICO OIL CONSERVATION COMMISSION
STATE LAND OFFICE BLDG SANTA FE NMEX=

MAIN OFFICE

'67 JUL 25 PM 11 26

ATTENTION EVLIS A. UTZ=SINCLAIR OIL AND GAS COMPANY
HEREBY SUPPORTS MOBIL OIL CORPORATION IN ITS
APPLICATION FOR AN AMENDMENT TO COMMISSION RULE 1103-A.
THIS MATTER IS SCHEDULED FOR HEARING JULY 26, 1967,
CASE NO. 3621=
R M ANDERSON=

=1103-A 26 1967 3621=

WU1201(R2-65)

THE COMPANY WILL APPRECIATE SUGGESTIONS FROM ITS PATRONS CONCERNING ITS SERVICE

CLASS OF SERVICE
This is a fast message unless its deferred character is indicated by the proper symbol.

WESTERN UNION TELEGRAM

W. P. MARSHALL
CHAIRMAN OF THE BOARD

R. W. McFALL
PRESIDENT

SYMBOLS
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LA035 NSC260

(50).

NS MDA079 PD=WUX MIDLAND TEX 24 1249P CDT=
NEW MEXICO SOIL CONSERVATION COMMISSION=
SANTAFE NMEX=

JUL 24 AM 11 59

ATTENTION MR ELVIS A UTZ OR DANIEL S NUTTER, EXAMINERS;
IN RE CASE NO. 3621, CRDOCKET OF JULY 26, 1967 - SHELL
OIL COMPANY SUPPORTS THE REQUEST OF MOBIL OIL CORPORATION
THAT RULE 1103-A BE AMENDED AS REQUESTED=
J E R SHEELER DIVISSON PRODUCTION MGR WESTERN DIV.
SHELL OIL CO MIDLAND, TEXAS==

3621 26 1967 1103-A

WU1201(R2-65)

THE COMPANY WILL APPRECIATE SUGGESTIONS FROM ITS PATRONS CONCERNING ITS SERVICE

RECEIVED
267 JUN 27 AM 8 4

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION
OF MOBIL OIL CORPORATION FOR
AMENDMENT OF COMMISSION RULE
1103A

CASE NO. 3621

A P P L I C A T I O N

Mobil Oil Corporation hereby makes application for
Amendment of Commission Rule 1103A as follows:

To delete from Rule 1103A, subsection (5) and (6) and
to add in lieu thereof, the following subsection to be designated
as Rule 1103A (5).

Performing remedial work on a well which, when
completed, will affect the original status of the
well. (This shall include ~~perforating~~ new reser-
voirs in existing wells or squeezing operations
on existing wells but is not applicable to new
wells in the process of being completed nor to old
wells being drilled or plugged back to another zone
when such recompletion has been authorized by an
approved Form C-101, Application for Permit to Drill,
Deepen or Plug Back, nor to old wells being perforated
in a presently producing reservoir, nor to acidizing,
fracturing or cleaning out old wells, nor to install-
ing artificial lift equipment in old wells.)


Applicant requests that this matter be set for hearing
following due notice of this Application as required by law, and
following hearing requests that the foregoing amendment be adopted
by the Commission.

Respectfully submitted,

MOBIL OIL CORPORATION

By Modrall, Seymour, Sperling, Roehl
& Harris

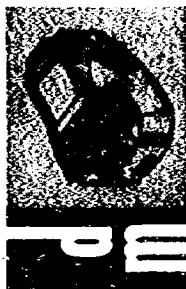
By


JAMES E. SPERLING, Its Attorneys
P. O. Box 466, 1200 Simms Building
Albuquerque, New Mexico

dearnley-meier reporting service, inc.

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BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
July 26, 1967

EXAMINER HEARING

IN THE MATTER OF:)

Application of Mobil Oil Corporation)
for an amendment to Commission Rule)
1103A)

Case No. 3621

BEFORE:

Elvis A. Utz, Examiner

TRANSCRIPT OF HEARING

MR. UTZ: Case 3621.

MR. HATCH: Case 3621, application of Mobil Oil Corporation for an amendment to Commission's Rule 1103A.

MR. SPERLING: J. E. Sperling appearing for the Applicant, Mobil Oil Corporation, we have one witness, Mr. Hart.

(Witness sworn.)

MR. UTZ: Are there other appearances in this case?
You may proceed.

FRANK HART, called as a witness by the Applicant, having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. SPERLING:

Q State your name, place of residence, employer and the capacity in which you are employed.

A Frank Hart, Midland, Texas, Mobil Oil Corporation, Senior Production Engineer.

Q Have you testified on any previous occasion before the Oil Conservation Commission of New Mexico?

A No, sir, I have not.

Q Mr. Hart, would you briefly give us your educational experience background with reference to your particular

employment?

A I graduated from Oklahoma State University in 1958, with an engineering degree. I was employed after that graduation by Gulf Oil Corporation in Monohans, Texas, I operated in the capacity of engineer for five and a half years. I returned to Norman, Oklahoma where I received a Juris Doctor of Law in 1966.

I worked for a period of one year in Pittsburgh, Pennsylvania as a patent attorney. In March of this year, I was hired by Mobil Oil Corporation and presently I am a Senior Producing Engineer in the proration department in Midland.

Q Your particular duties at the moment include the handling of proration matters in the Midland District?

A Yes, sir, in the Midland District, in Texas and in New Mexico.

Q Now, what is sought by Mobil Oil Corporation's application in this particular matter, which seeks to amend one of the Commission's rules?

A We seek to amend Rule Number 1103, Subsection A-5 and A-6, by rewriting this rule and doing away with the requirement to file Notice of Intention and getting approval of this Notice of Intention for fracturing, acidizing and installing artificial lift equipment in old wells.

Q Now, the application as originally filed, sought an amendment to the rule which included a procedure which was not a part of the statement that you just made. I assume that you wish to amend the application to delete that particular procedure?

A Yes, sir, that was perforating producing formations in old wells. It would be a re-perforation and after talking to the division office in Hobbs of the Conservation Commission, they indicated that it would probably be best not to pursue that matter and we are deleting that from our proposed rule.

MR. PORTER: You mean the District Supervisor denied that portion of your application for you.

Q (By Mr. Sperling) Well, as I understand it, then, you asked for the record that the portion of the application which seeks to amend the rule which relates to the reporting of proposed perforating of old wells be deleted, is that correct?

A That is correct.

Q Which leaves, acidizing, fracturing and cleaning out previously completed wells?

A Yes, sir.

Q All right, would you proceed with your testimony?

A Rule 1103A of the New Mexico Oil Conservation

Commission Statewide Rules provides for Sundry Notices and Reports on Wells, Form C-103, as a Notice of Intention. Under this regulation, C-103 is to be filed with the appropriate District Office of the Commission to obtain Commission approval prior to the commencing certain operations.

Statewide Rule 1103, Subsection A5, Report of remedial work on a well, requires mandatory approval of the Notice of Intention, Form C-103, prior to performing acidizing, squeezing, perforating and fracturing operations on a previously completed well. Subsection A6, Statewide Rule 1103, is a complimentary regulation.

Statewide Rule 1103, Section B, requires mandatory filing of the Subsequent Report, Form C-103, after completion of the operations provided under 1103A. That Subsequent Report reiterates information presented on the Notice of Intention and, in addition, requires a detailed account of the work done, manner of performing the work and results of the operation.

Mobil Oil Corporation, pursuant to reducing its administrative functions, requests amendment of Statewide Rule 1103, Subsections A5 and A6. It is urged that certain information required by Subsections A5 and A6 is redundant information, considerably increases the Commission's work load and, considering the technological advances in the industry, is today

of little value. Fracturing and acidizing operations were introduced into the industry in the late 1940's. Owing to the industry's acceptance of these procedures, such operations have become common practices of a routine nature.

While those operations were in their early development stages, it is understandable that the Commission desired a statute granting statewide control and supervision. Today, however, it is Mobil's belief that these requirements have been antiquated and the forementioned part of the said Rule is not obsolete. In addition, the information submitted to the Commission under Rule 1103 A5 and 1103 A6 encompasses only anticipated operations. Because of the sequence of most modern downhole work is dictated by the results obtained from a previous step in the operations, most information obtained from Rules 1103 A5 and A6 is of little value in view of the Subsequent Report filed in accordance with Rule 1103 B.

Pursuant to providing necessary informative information to the Commission while eliminating obsolete requirements, Mobil Oil Corporation respectfully requests that Statewide Rule 1103 be amended as follows:

Cancel Rules 1103 A5, 1103 A6 and in lieu thereof, adopt the following rule:

Performing remedial work on a well which, when

dearnley-meier reporting services inc.

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completed, will affect the original status of the well. (This shall include perforating reservoirs in existing wells or squeezing operations on existing wells, but is not applicable to new wells in the process of being completed nor to old wells being drilled or plugged back to another zone when such recompletion has been authorized by an approved Form C-101, Application for Permit to Drill, Deepen or Plug Back, nor to acidizing, fracturing or cleaning out old wells, nor to installing artificial lift equipment in old wells.)

Q Is it your opinion, Mr. Hart, that the adoption of the amendment to the rule as proposed will result in a reduction in the work of the operators as well as a reduction in the work of the Commission and without jeopardizing the efficiency of either?

A Yes, sir, I do.

Q Do you have anything else to add?

A No, sir, except the fact that the Hobbs District of the Conservation Commission of New Mexico indicated that they were in accordance with this rule change and it would certainly help their work load by lightening it.

MR. SPERLING: Mr. Examiner, it might be helpful since the language of the Rule is incorporated in the testimony which has been read into the record by Mr. Hart; if that

testimony were marked, I think, as an exhibit, or actually, I think the language is included as part of the application, but I don't believe the application has the amendment which we spoke of earlier.

MR. UTZ: Why don't we mark this as Exhibit 1.

(Whereupon, Applicant's Exhibit 1 was marked for identification.)

Q Now, Mr. Hart, there has been marked as Exhibit 1 the testimony which now is a part of the record in this case. Was this prepared by you including the suggested amendment, or under your supervision, or in consultation with your superiors?

A Yes, sir, it was.

MR. SPERLING: I would like to offer Exhibit 1 at this time.

MR. UTZ: Without objection, Exhibit 1 will be entered into the record of this case.

MR. SPERLING: That's all I have at this time, Mr. Examiner.

CROSS EXAMINATION

BY MR. UTZ:

Q I am going to try to boil this thing down, Mr. Hart. This rule change would eliminate the filing of C-103 on old wells for cleanout fracking, acidizing and installation of

artificial lift, that is about all it does, is that right?

A Yes, sir, under the preliminary report, under the A Section of 1103, yes, sir.

Q Under the A Section?

A Yes, sir.

MR. UTZ: Are there other questions of the witness?

CROSS EXAMINATION

BY MR. PORTER:

Q Now, did that include squeezing performances?

A No, squeezing will be --

Q It will require notice?

A It will still require notice.

Q Now, this is advanced notice on 103 --

A Yes, sir.

Q -- where you have been required to file a Notice of Intention, so to speak, to do these various things. Have you ever known the Commission to deny permission to frack or acidize, or clean out a well?

A No, not to my knowledge, but this is more in regard to eliminating the paper work for our company and eliminating the procedure that your department goes through in authorizing such, and the time procedure in waiting on that authority to come back.

CROSS EXAMINATION

BY MR. UTZ:

Q The district people, I presume, felt they should have notice of re-perforating on old wells so they could keep track of the pools?

A Yes, sir, they did.

MR. UTZ: Any other questions? The witness may be excused.

(Witness excused.)

MR. UTZ: Statements in this case.

MR. HOCKER: R. L. Hocker for Amerada Petroleum. Amerada supports the application of Mobil in this case, and we will even go further; we would be willing to go ahead and forego the notice on perforating if you so desire.

We are in favor of eliminating as much paper work that really doesn't serve any purpose, as possible.

MR. UTZ: Thank you. Any other statements?

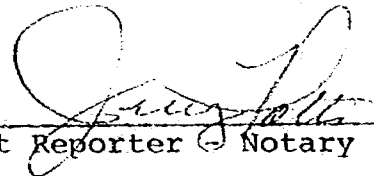
MR. HATCH: The Commission has received communication from Phillips Petroleum Company, Pan American, Shell and Sinclair supporting the application.

MR. UTZ: Are there any other statements? The case will be taken under advisement.

STATE OF NEW MEXICO)
) ss
 COUNTY OF BERNALILLO)

I, JERRY POTTS, Court Reporter, do hereby certify that the foregoing and attached transcript of proceedings before the New Mexico Oil Conservation Commission Examiner at Santa Fe, New Mexico, is a true and correct record to the best of my knowledge, skill and ability.

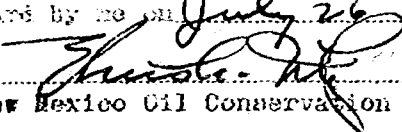
IN WITNESS WHEREOF I have affixed my hand and notarial seal this 3rd day of August, 1967


 Court Reporter - Notary Public

My Commission Expires

7-10-70

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 3621, heard by me on July 26, 1967.


 Examiner
 New Mexico Oil Conservation Commission

dearnley-meier

SPECIALIZING IN: DEPOSITIONS, HEARINGS, STATEMENTS, EXPERT TESTIMONY, DAILY COPY, CONVENTIONS

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 1400 FIRST NATIONAL BANK EAST • PHONE 256-1294 • ALBUQUERQUE, NEW MEXICO 87108

TESTIMONY

BEFORE EXAMINER UTZ
OIL CONSERVATION COMMISSION
EXHIBIT NO. 1
CASE NO. 3622

Rule # 1103A of the New Mexico Oil Conservation Commission Statewide Rules provides for Sundry Notices and Reports on Wells, Form C-103, as a Notice of Intention. Under this regulation, Form C-103 is to be filed with the appropriate District Office of the Commission to obtain Commission approval prior to commencing certain operations.

Statewide Rule 1103, Subsection A5, Report of remedial work on a well, requires mandatory approval of the Notice of Intention, Form C-103, prior to performing acidizing, squeezing, perforating and fracturing operations on a previously completed well. Subsection A6, Statewide Rule 1103, is a complimentary regulation.

Statewide Rule 1103, Section B, requires mandatory filing of the Subsequent Report, Form C-103, after completion of the operations approved under 1103A. That Subsequent Report reiterates information presented on The Notice of Intention and, in addition, requires a detailed account of the work done, manner of performing the work and results of the operation.

Mobil Oil Corporation, pursuant to reducing its administration functions, requests amendment of Statewide Rule 1103, Subsections A5 and A6. It is urged that certain information required by Subsections A5 and A6 is redundant information, considerably increases the Commission's work load and, considering the technological advances in the industry, is today of little value.

Fracturing and acidizing operations were introduced into the industry in the late 1940's. Owing to the industry's acceptance of these procedures, such operations have become common practices of a routine nature.

While those operations were in their early development stages, it is understandable that the Commission desired a statute granting statewide control and supervision. Today, however, it is Mobil's belief that these requirements have become antiquated and the forementioned part of the said Rule is now obsolete. In addition, the information submitted to the Commission under 1103 A5 and 1103 A6 encompasses only anticipated operations. Because the sequence of most modern downhole work is dictated by the results obtained from a previous step in the operations, most information obtained from Rules 1103 A5 and A6 is of little value in view of the Subsequent Report filed in accordance with Rule 1103 B.

Pursuant to providing necessary informative information to the Commission while eliminating obsolete requirements, Mobil Oil Corporation respectfully requests that Statewide Rule 1103 be amended as follows:

AMENDMENT TO THE OIL CONSERVATION
COMMISSION'S STATEWIDE RULE 1103 A

Cancel Rules 1103 A5, 1103 A6 and, in lieu thereof, adopt the following rule:

(5) Performing remedial work on a well which, when completed, will affect the original status of the well. (This shall include perforating reservoirs in existing wells or squeezing operations on existing wells,

but is not applicable to new wells in the process of being completed nor to old wells being drilled or plugged back to another zone when such recompletion has been authorized by an approved Form C-101, Application for Permit to Drill, Deepen or Plug Back, nor to acidizing, fracturing or cleaning out old wells, nor to installing artificial lift equipment in old wells.)