Imperial-American Management Company

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March 10, 1971

New Mexico Oil Conservation Commission P. 0. Box 2088 Santa Fe, New Mexico 87501

DHC-79 Due Cips 12

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

Re: Request for Exception to Rule 303-A Downhole Commingling - per Rule 303-C Royalty Holding Lease, Well No. 2 Blinebry and Wantz Abo Pools Lea County, New Mexico

Gentlemen:

Imperial-American Management Company respectfully requests administrative approval under the provisions of Order No. R-3845 to commingle, in the well bore, oil production from the Blinebry Pool and the Wantz Abo Pool which are dually completed in our Royalty Holding No. 2 well located in Unit G, Section 25, T-21-S, R-37-E, Lea County, New Mexico. This dual completion was permitted by Administrative Order No. MC-1860, dated June 15, 1969.

We believe that this well qualifies for administrative approval of down-hole commingling under the Provisions of Rule 303-C. Both zones are classified as oil zones. The deepest perforation in the lower zone is at 7381' in this well. We attach Form C-116 which indicates that the production rates for both oil and water fall within the limits specified by Rule 303-C. We also attach copies of our production decline curve for each zone. Both zones are presently being artificially lifted by rod pumps; therefore, a rod pump will be utilized after commingling.

We have had water samples collected from each zone and have had these samples checked for compatability by Barold. Copies of their reports are attached. The reports indicate there will not be an instability problem caused by mixing these waters.

New Mexico Oil Conservation Commission Attention: Mr. H. L. Porter, Jr. Re: <u>Request for Exception to Rule 303-A</u> Royalty Holding Lease, Well No. 2 Blinebry and Wantz Abo Pools Lea County, New Mexico

Page 2

We also attach a data sheet on which we have indicated our estimates of the current bottom hole pressures of these zones and a calculation showing that the commingled production will not have less value than the individual streams sold separately.

Ownership of the production from both zones to be commingled is common as to royalty, overriding royalty, and working interests.

This lease is on fee property. A copy of this application is being submitted to each offset operator shown on the attached list.

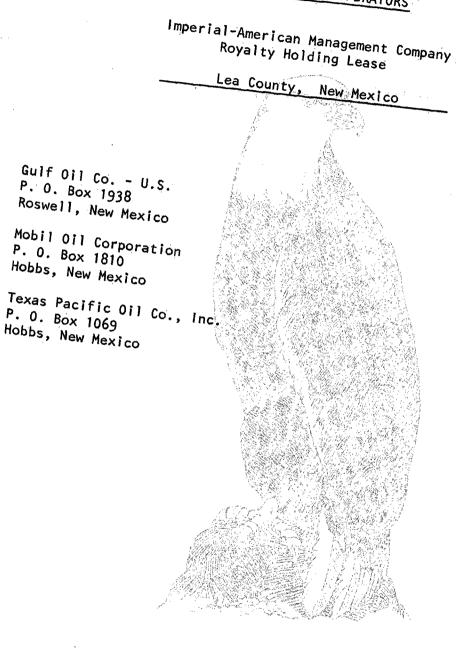
Very truly yours,

IMPERIAL-AMERICAN MANAGEMENT COMPANY

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DKR:1b Attachments

LIST OF OFFSET OPERATORS



DATA SHEET

Request for Down-Hole Commingling Imperial-American Management Company Royalty Holding Well No. 2

- I. Estimated Bottom Hole Pressure
 - A. <u>Blinebry Pool Completion</u> Unable to obtain a satisfactory sonic fluid level. Zone pumps off, permitting only 15% pump efficiency. Estimated Operating BHP - 200 psi Estimated Static BHP - 600 psi
 - B. <u>Wantz Abo Pool Completion</u> Lower zone, cannot obtain sonic fluid level. Pressure low enough to limit pump efficiency to 20%. Estimated Operating BHP - 200 psi Estimated Static BHP - 200 psi
- II. Value of Commingled Production

Oil from both the Blinebry and Wantz Abo is being sold to The Permian Corporation by truck. The price is based on Atlantic Richfield's posting for West Texas-New Mexico intermediate grade crude, with a top price of \$3.56/bbl. for 40 deg. API and a 2¢/degree price differential for each degree below 40 deg. API.

The Blinebry zone oil normally is 37.5 deg. API with a price of \$3.50/bbl. The Wantz Abo oil normally runs 39.5 deg. API with a price of \$3.54/bbl. At the current rates of production, the gravity of the mixture should be at least 38.5 deg. API and receive a price of \$3.52/bbl.

Blinebry - Avg. price \$3.50/bb1. X 9 BOPD = Wantz Abo - Avg. price \$3.54/bb1. X 9 BOPD =	\$31.50/day <u>31.86</u> /day \$63.36/day
Wantz Abo - Avg. price \$3.54/bbl. X 9 BOPD =	

Mixture - Avg. price \$3.52/bbl. X 18 BOPD =

\$63.36/day

No loss in value of product should result from commingling these zones in the well bore.

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No well will be assigned an allowable greater than the amount of oil produced on the official test. During gas-oil ratio test, each well shall be produced at a rate not exceeding the top unit allowable for the located by more than 25 percent. Operator is encouraged to take advantage of this 25 percent tolerance in order tha increased allowables when authorized by the Commission. Gas volumes must be reported in MCF measured at a pressure base of 15.025 psia and a temperature of 60° F will be 0.60. Report casing pressure in lieu of tubing pressure for any well producing through casing. Mail original and one copy of this report to the district office of the New Mexico Oil Conservation Commiss Rule 301 and appropriate pool rules.		*WANTZ ABO POOL Royalty Holding	*BLINEBRY POOL	LEASE NAME	Address 507 Midland Savings Bldg M	
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(Signature) Manager (Title) (Date)		· · · · · · · · · · · · · · · · · · ·		TEST GAS		C-116 Revised 1-1-65
I hereby certify that the above information is true and complete to the best of my know- ledge and belief.				GAS - OIL RATIO CU.FT/BBL		

(Date)



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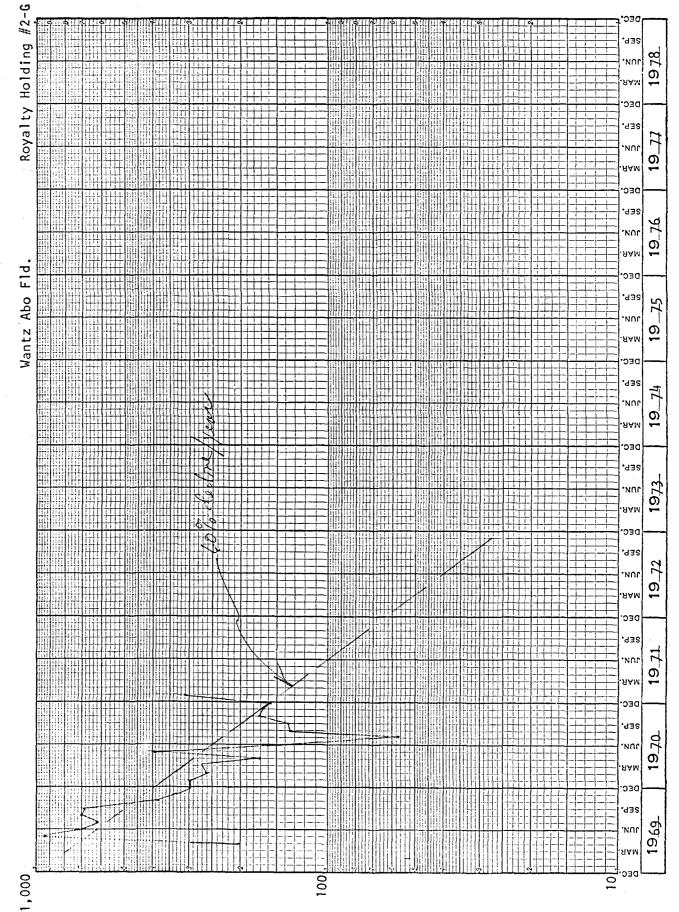
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