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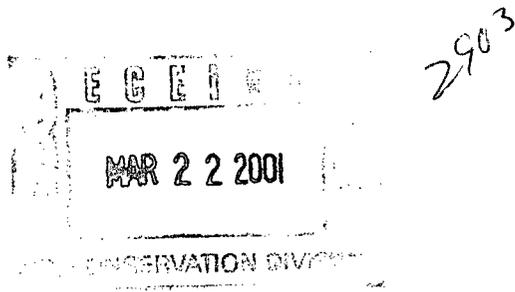
DHC

4/11/01



POGO PRODUCING COMPANY

March 20, 2001



Via CM RRR 7099 3220 0005 5521 1209
New Mexico Oil Conservation Division
Attn: Mr. David R. Catanach
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: RED TANK, SE PROSPECT
Lea County, New Mexico

APPLICATION FOR ADMINISTRATIVE APPROVAL FOR DOWNHOLE COMMINGLING
Covington "A" Federal No 37 Well
1,575' FSL and 1,950' FEL, Section 25, T-22-S, R-32-E, N.M.P.M.
Federal Oil and Gas Lease NM-2379
Pogo Lease L12

Gentlemen:

Pogo Producing Company respectfully submits Form C-107A (in duplicate), along with attachments thereto, in connection with Pogo's request for Administrative Approval to downhole commingle production from the captioned well.

Should you have any questions regarding this matter, please give me a call at (915) 685-8120.

Sincerely,

POGO PRODUCING COMPANY


Terry Gant
Division Landman

Enclosures

cc (w/enclosure): New Mexico Oil Conservation Division
Attn: District Supervisor
P.O. Box 1980
Hobbs, New Mexico 88240

Bureau of Land Management
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

District I
1625 N. French Drive, Hobbs, NM 88240

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107A
Revised May 15, 2000

District II
811 South First Street, Artesia, NM 88210

OIL CONSERVATION DIVISION
2040 South Pacheco

APPLICATION TYPE
X Single

District III
Well
1000 Rio Brazos Road, Aztec, NM 87410

Santa Fe, New Mexico 87505

Establish Pre-Approved Pools
EXISTING WELLBORE
X Yes ___ No

District IV
2040 South Pacheco, Santa Fe, NM 87505

APPLICATION FOR DOWNHOLE COMMINGLING

Pogo Producing Company P. O. Box 10340 Midland, TX 79702-7340

Operator Address
Covington A Federal 37 J, Sec 25, T-22-S, R-32-E Lea

Lease Well No. Unit Letter-Section-Township-Range County
017891 9316 30-025-34455 X
OGRID No. Property Code API No. Lease Type: Federal State Fee

DATA ELEMENT	UPPER ZONE	INTERMEDIATE ZONE	LOWER ZONE
Pool Name	Red Tank; Delaware, West		Red Tank; Bone Spring
Pool Code	51689		51683
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	8608' - 8628'		8821' - 8841'
Method of Production (Flowing or Artificial Lift)	Artificial Lift		Artificial Lift
Bottomhole Pressure (Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone)	Current: 300 psi Producing (e) Original: 3218 psi Shut-In		Current: 1800 psi Shut-In (e) Original: 3637 psi Shut-In
Oil Gravity or Gas BTU (Degree API or Gas BTU)	40.8 degrees API		41.6 degrees API
Producing, Shut-In or New Zone	Producing		Shut-In
Date and Oil/Gas/Water Rates of Last Production. (Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data.)	Date: 1-20-01 Rates: 11 BO, 32 BW, 14 MCF	Date: Rates:	Date: 10-28-99 Rates: 40 BO, 15 BW, 244 MCF
Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)	Oil 22 % Gas 5 %	Oil % Gas %	Oil 78 % Gas 95 %

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones? Yes X No ___
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail? Yes ___ No ___
Are all produced fluids from all commingled zones compatible with each other? Yes X No ___
Will commingling decrease the value of production? Yes ___ No X ___
If this well is on, or communitized with, state or federal lands, has either the Commissioner of Public Lands or the United States Bureau of Land Management been notified in writing of this application? Yes X No ___

NMOCD Reference Case No. applicable to this well: _____

Attachments:

- C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
- Production curve for each zone for at least one year. (If not available, attach explanation.)
- For zones with no production history, estimated production rates and supporting data.
- Data to support allocation method or formula.
- Notification list of working, royalty and overriding royalty interests for uncommon interest cases.
- Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Ron D. Gasser TITLE Div. Petroleum Engineering Mgr. DATE 3-20-2001
TYPE OR PRINT NAME Ron D. Gasser TELEPHONE NO. 915 685-8100

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

DISTRICT IV
P.O. BOX 2086, SANTA FE, N.M. 87504-2086

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-34455	Pool Code 51683	Pool Name Red Tank; Bone Spring
Property Code 9316	Property Name COVINGTON "A" FEDERAL	Well Number 37
OGRID No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 3762

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
K	25	22 S	32 E		1575	SOUTH	1950	EAST	LEA

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres 40	Joint or Infill	Consolidation Code	Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	<p>OPERATOR CERTIFICATION</p> <p>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Barrett L. Smith</i> Signature Barrett L. Smith Printed Name Sr. Operations Engineer Title March 9, 2001 Date</p>
	<p>SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>JUNE 3, 1998 Date Surveyed Signature & Seal of Professional Surveyor DMCC</p> <p><i>Ronald J. Eidson</i> NEW MEXICO 98-11-0858</p> <p>Certified Professional Surveyor No. RONALD J. EIDSON 3239 12641 McDONALD 12185</p>

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals and Natural Resources Department

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P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

DISTRICT IV
P.O. BOX 2088, SANTA FE, N.M. 87504-2088

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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OGRID No. 017891	Operator Name POGO PRODUCING COMPANY	Elevation 3762

Surface Location

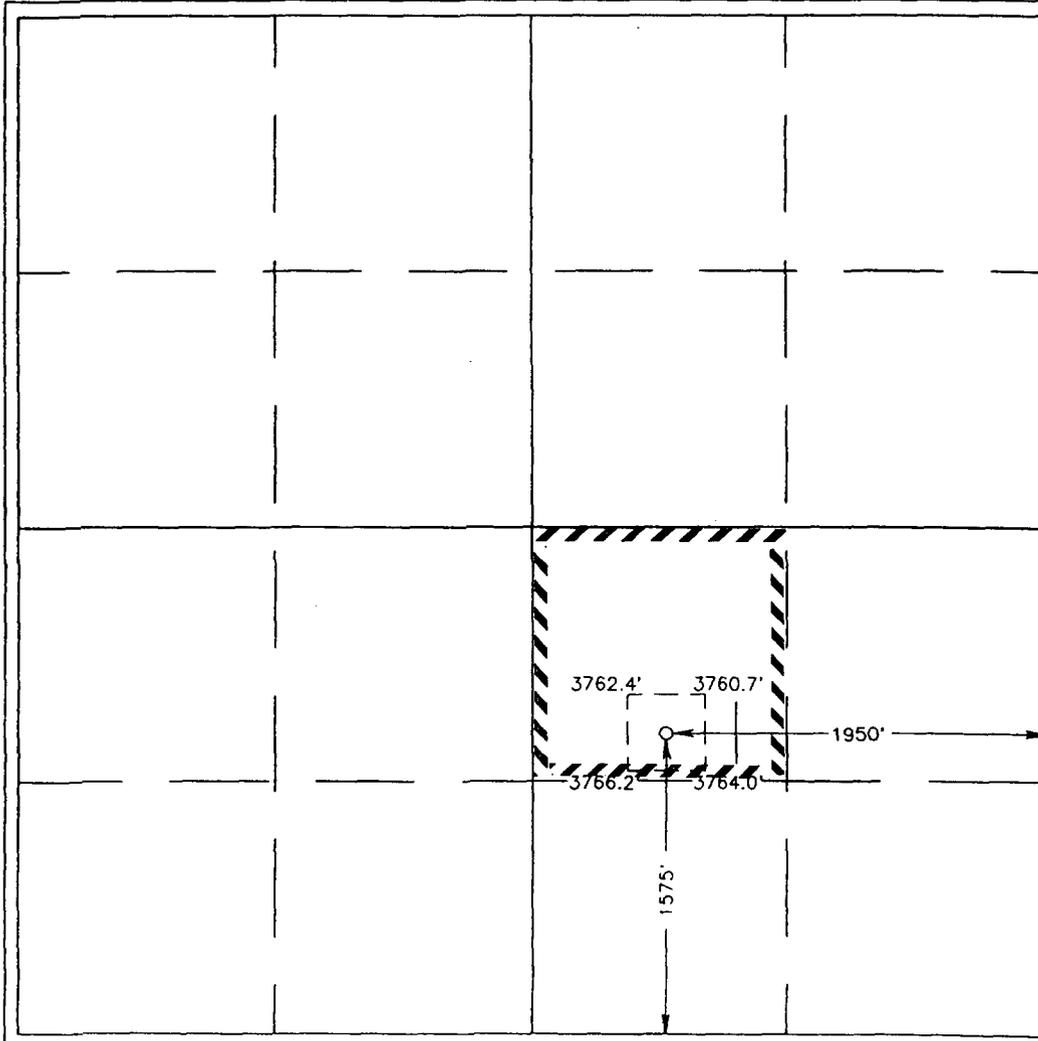
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OPERATOR CERTIFICATION

I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.

Barrett L. Smith
Signature
Barrett L. Smith
Printed Name
Sr. Operations Engineer
Title
March 9, 2001
Date

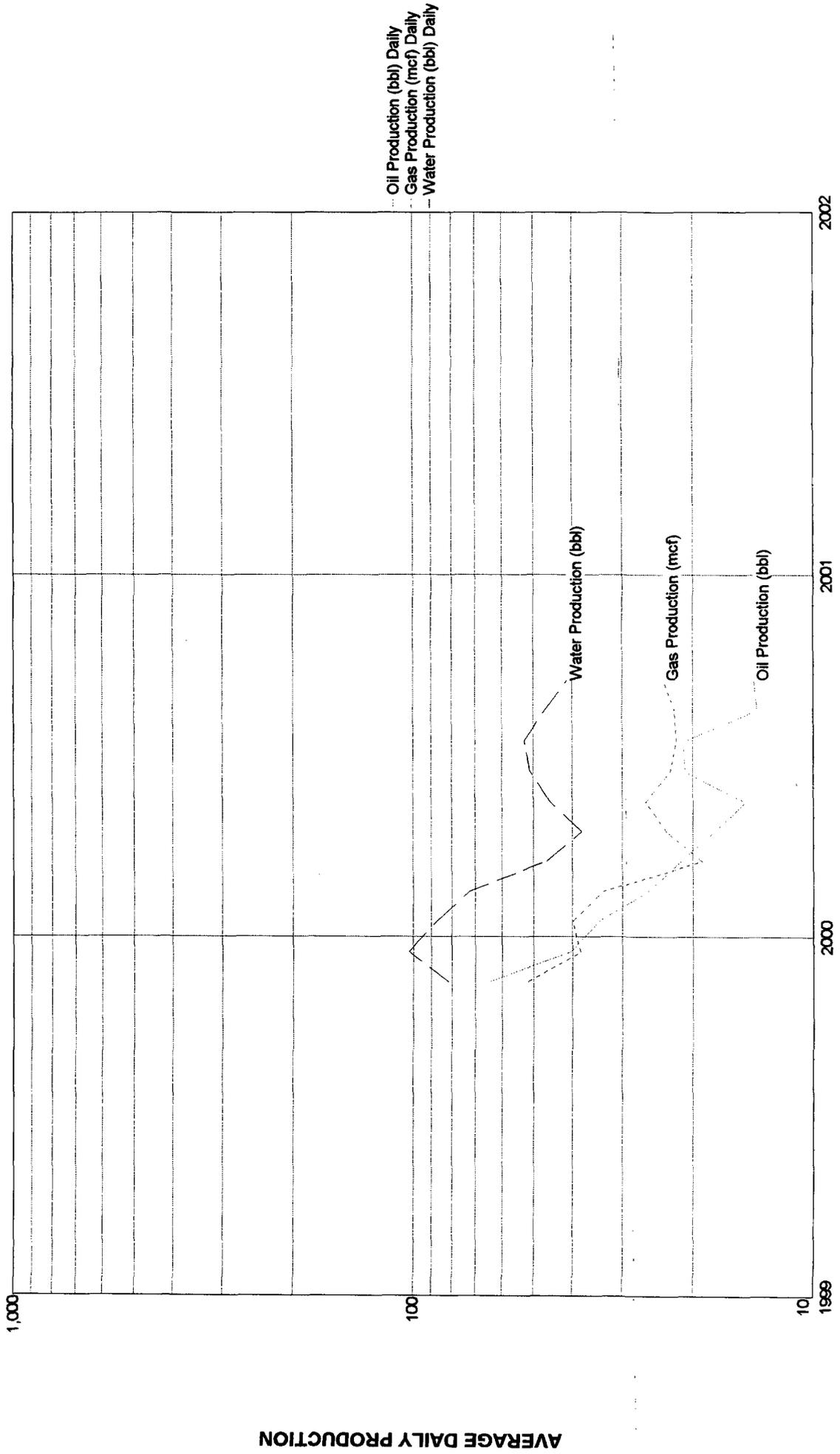
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I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

JUNE 3, 1998
Date Surveyed
Signature & Seal of Professional Surveyor
NEW MEXICO
98-11-0856
Certification No. RONALD G. EIDSON 3239
12641
McDONALD 12185

Lease Name: COVINGTON A FEDERAL
 County, State: LEA, NM
 Operator: POGO PRODUCING COMPANY
 Field: RED TANK WEST
 Reservoir: DELAWARE
 Location: 25 22S 32E NW SE

WELL NUMBER 37



AVERAGE DAILY PRODUCTION

Oil Production (bb) Daily
 Gas Production (mcf) Daily
 Water Production (bb) Daily

2002

2001

2000

1999

YEAR

