FNGINEERING DIVISION

Tulisa z., Okuahoma

G. RODGERS, GENERAL MANAGER

PRODUCTION DEPARTMENT

October 24. 1956

Oil Conservation Commission State of New Mexico 125 Mabry Hall Capitol Building Santa Fe, New Mexico

Re: Exception to Rule 5 of the Special Rules and Regulations for the Tubb Gas Pool, Lea County,

New Mexico

Tots 384 (M-MM) Gentlemen:

Sunray Mid-Continent, Oil Company respectfully requests that administrative approval be granted for assignment of an 80-acre non-standard gas proration unit to its Eva Owen Well No. 1 in the Tubb Cas Pool, Lea County, New Mexico, as an exception to Rule 5 of the Special Rules and Regulations for the Tubb Gas Pool as established under Order R-586.

Sunray's Eva Owen Well No. 1, located 660 feet from the North and West lines of Section 3, Township 22 South, Range 37 East, Lea County, was completed on August 2, 1946 as a Drinkard oil well with perforations from 6500 to 6554 feet. 12-1/4" surface casing was set at 292 feet with 300 sacks of cement. 9-5/8" casing was set at 1174 feet with 225 sacks of cement. 7" casing was set at 3592 feet with 400 sacks of cement. 5" casing was set at 6599 feet" with 250 sacks of cement. The total depth of the well was 6600 feet. It is planned to dually complete this well with the presently completed Drinkard oil zone flowing through the tubing and the Tubb gas zone flowing through the casing-tubing annulus. By separate application, administrative approval of such proposed dual completion is being requested.

An exception to Rule 5 is required since this lease does not include 160 acres. Under Rule 5 (d) the Secretary-Director of the Commission shall have authority to grant an exception to Rule 5 (a) without notice and hearing where application has been filed and where certain facts exist and certain provisions are complied with. In compliance with the requirements of this rule, Sunray alleges and states that the following conditions exist:



D-X SUNRAY OIL COMPANY IS A WHOLLY-OWNED REFINING & MARKETING SUBSIDIARY

- 1. The requested 80-acre non-standard gas proration unit consists of two contiguous quarter-quarter sections with a common side between them.
- 2. The requested 80-acre non-standard gas proration unit lies wholly within a single governmental quarter section.
- 3. The entire 80-acre unit may reasonably be presumed to be productive of gas from the Tubb Gas Pool.
 - 4. The length or width of this 80-acre unit does not exceed 2640 feet.

As required by Paragraph 6 of Rule 5 (d) the following operators have been notified by registered mail this date, by copy of this letter and the attached plat:

Stanolind Oil and Gas Company P. O. Box 1410 Fort Worth, Texas

Amerada Petroleum Corporation Drawer "D" Monument, New Mexico

Magnolia Petroleum Company P. O. Box 672 Roswell, New Mexico

Sunray asks that this request for administrative approval be granted, as such approval by the Commission will prevent waste, will protect correlative rights of all concerned and will serve the best interests of conservation. I hereby certify that the information contained in this application is true and complete to the best of my knowledge.

Yours very truly,

Burn 4. Ersels

SUNRAY MID-CONTINENT OIL COMPANY

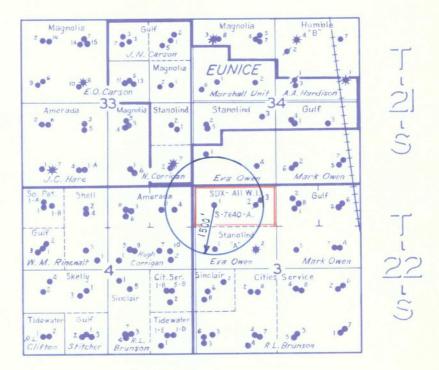
Burns H. Errebo Attorney

Subscribed and sworn to before me, a Notary Public within and for the State of Oklahoma, County of Tulsa, on this 24th day of October, 1956.

My Commission expires: 25th day of February, 1957

Attachment: Ownership Map

R - 37 - E



PRODUCING	FORMATION	SUNRAY MID-CONTINENT OIL COMPANY	PRODUCING LEASES
NAME	AVERAGE DEPTH	FIELD: DRINKARD, BLINEBRY & TUBB	OWEN, E.
		DISTRICT: N&W TEX. GROUP: EUNICE COUNTY: LEA STATE: NEW MEX	
		SCALE 3000 1500 0 1500 3000 600	
		FEET	

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