Mid-Continent Region Production United States



June 17, 1998

Ms. Lori Wrotenbery, Director State of New Mexico Oil Conservation Division PO Box 2088 Santa Fe NM 87504-2088

Re:

Request for Exemption to Rule 309-A

Surface Lease Commingling

Ms. Lori Wrotenbery:

Marathon Oil Company respectfully requests the State of New Mexico Oil Conservation Division to grant administrative approval for exemption to Rule 309-A for the attached referenced leases. The James Buchanan '33' St. lease, Samuel Burns '34' St. lease, David Crockett '27' St. lease, and Henry Courtman '4' St. lease are currently commingled per Order No. CTB-467. Marathon is requesting for the James Garvin '22' St. lease, J. Guerrero '34' St. lease, Edward Mitchusson '4' St. lease, George Pagan '26' St. lease, and W.B. Travis '15' St. lease to also be included in Order No. CTB-467.

Marathon Oil Company proposes to produce the leases to a common stock tank battery with separate metering facilities prior to commingling. The common battery will be at the James Buchanan '33' St. No. 1 location. It should be noted that there is a diversity of ownership between the leases. However, the proposed production operation is in accordance with the applicable provisions and all necessary parties have been notified by certified mail.

Please find attached a lease commingling plat and a production facility schematic. Pease note that the value of the oil will not be adversely effected.

If you have any questions or comments, please advise.

Sincerely,

Bryan L. Williams Production Engineer

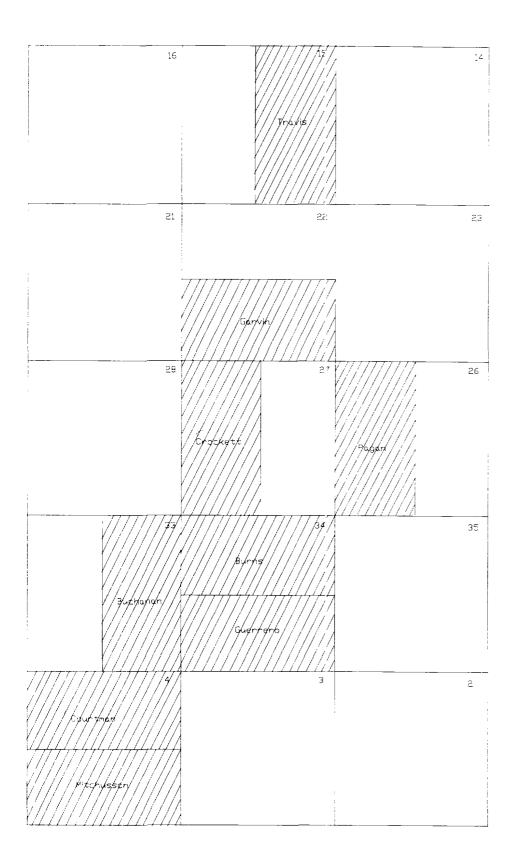
(505) 393-7106 ext. 212

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Attachments

P.O. Box 2409 Hobbs, NM 88241-2409 Telephone 505/393-7106



W.B. Travis 15 State Lease E 1/2, Sec. 15, T-185, R-28E

James Janvin 22 State Lease S 1/2, Sec. 22, T-185. R-28E

David Chockett 27 State Lease W 1/2, Sec. 27, T-185, R-285

George Pagan 26 State Lease W 1/2, Sec. 26, T-185, R-28E

James Buchanan 33 State Lease E 1/2, Sec. 33, T-185, R28E

Samuel Burns 34 State Lease N 1/2, Sec. 34, T-185, R-28E

J. Juernero 34 State Lease S 1/2, Sec. 34, T-185, R-28E

Henry Countman 4 State Lease N 1/2, Sec. 4, T-198, R-28E

Edward Mitchusson 4 State Lease S 1/2, Sec. 4, T-19 S, R-28 E

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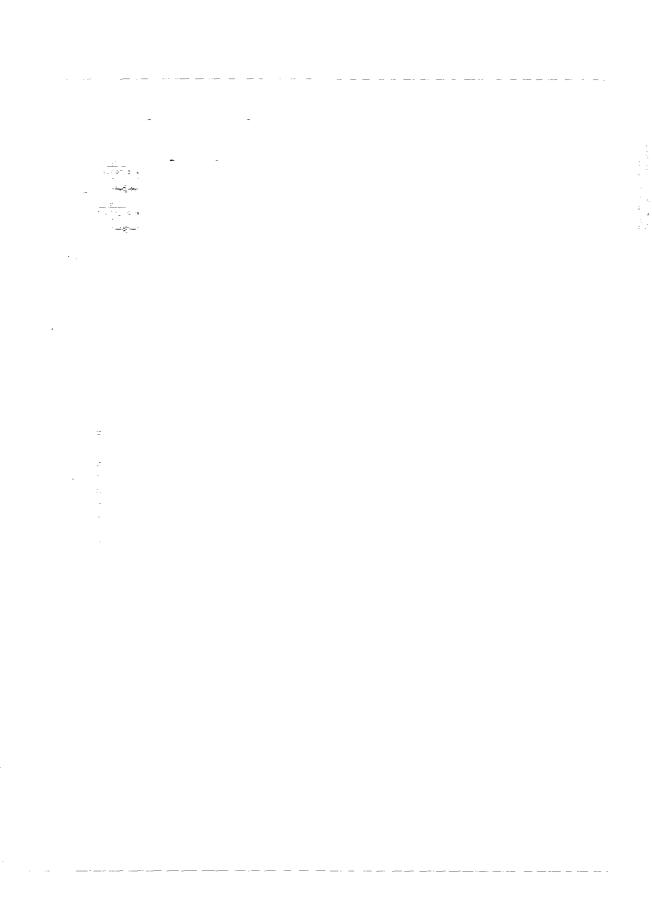
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Mr. Pete Martinez Commissioner of Public Lands State Land Office Building P.O. Box 1148 Santa Fe, NM 87504-1148

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