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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

Application Acronyms:

[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

- [1] **TYPE OF APPLICATION -** Check Those Which Apply for [A]
 - [A] Location Spacing Unit Directional Drilling

MAY 2 4

Check One Only for [B] and [C]

- ✓ [B] Commingling Storage Measurement
 □ DHC □ CTB □ PLC □ PC □ OLS □ OLM
 - [C] Injection Disposal Pressure Increase Enhanced Oil Recovery WFX PMX SWD IPI EOR PPR

[2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply

- [A] Uvrking, Royalty or Overriding Royalty Interest Owners
- [B] Offset Operators, Leaseholders or Surface Owner
- [C] Application is One Which Requires Published Legal Notice
- [D] Dotification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] **U** Waivers are Attached

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

n E. Kitchie

Regulatory Agent 5-21-99

May 21, 1999

New Mexico Oil Conservation Division Department of Energy and Minerals State of New Mexico 2040 South Pacheco Santa Fe, NM 87501

Att: Mark Ashley, Engineering Unit

RE: Conoco, Inc., Britt B, Well #28, Skaggs Abo gas pool, Surface Commingling, Section 15, T20S, R37E, Lea County, New Mexico

Dear Mark,

Conoco, Inc. has received permission to downhole commingle the Skaggs Abo gas pool and the Monument Tubb pool in the above referenced well. In the past, Well #28 produced from the Skaggs Abo gas pool. The well was recompleted and is currently producing from the Monument Tubb pool. As described in the attached "Justification" we do not believe that there will be a significant volume of fluids. In the event condensate is produced from the Skaggs Abo pool we are requesting permission to transfer fluids to the existing Britt B battery. Please see enclosed a copy of the Britt B tank battery diagram and land plat.

Ownership and working interest for all zones is common; the "Justification" attached details the anticipated gas production. Please let us know if you have any questions concerning this request. It is anticipated that Well #28 will be the only Britt B well which will be completed in the Skaggs Abo gas pool vs. the SE Monument Abo gas pool. Thank you.

Yours truly, Kulk

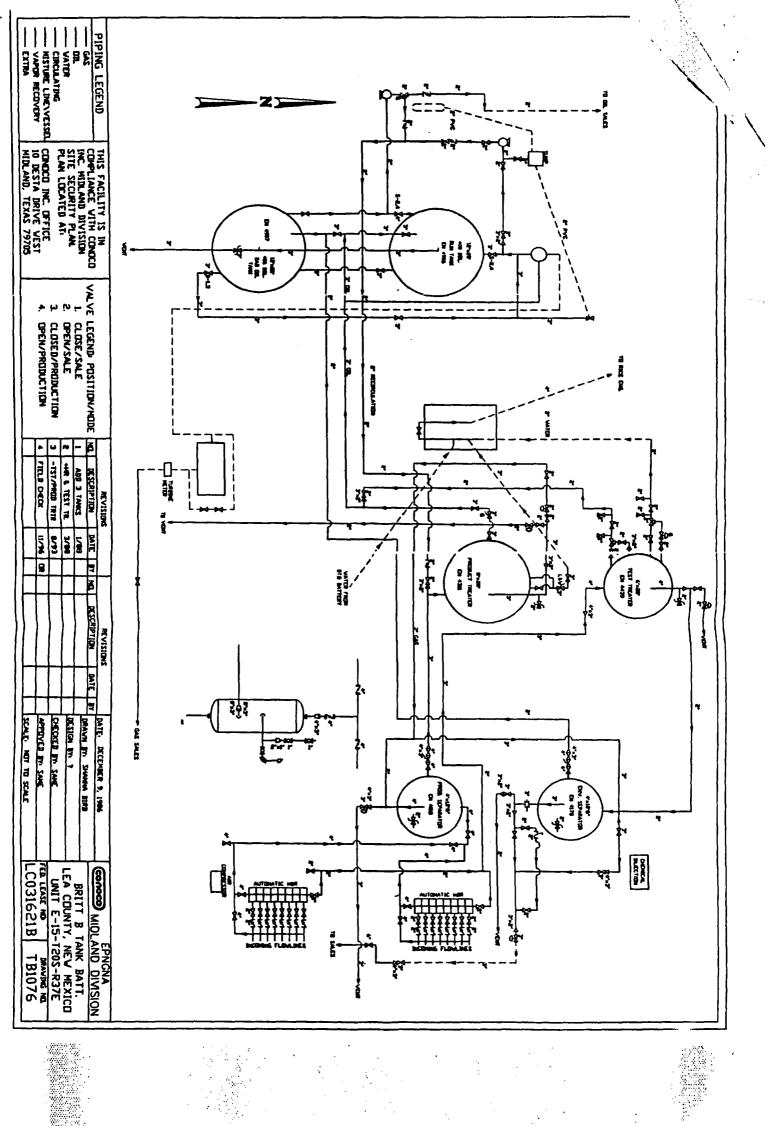
Ann E. Ritchie, Regulatory Agent (915) 684-6381/1-800-432-2967 Fax: (915) 682-1458 **Conoco, Inc.** 10 Desta Dr., Suite 100W Midland, TX 79705-4500

Attachments Cc: Reesa Wilkes-Conoco/Midland

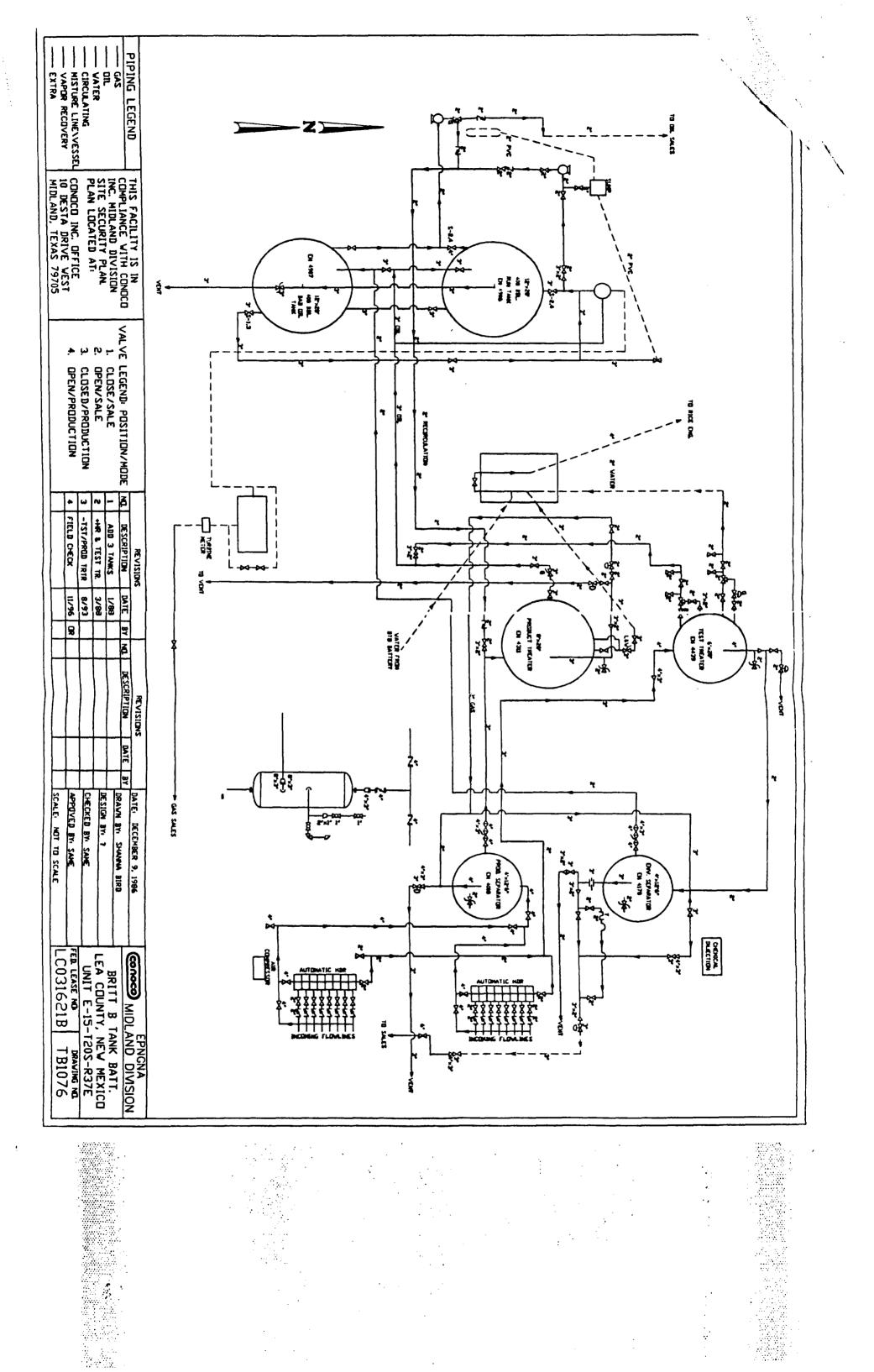
Britt B, Well #28 Surface Commingling Justification

Conoco, Inc. is seeking permission to surface commingle production from our Britt B, Well #28, which is currently producing from the Monument Tubb pool. Conoco, Inc. has obtained permission by administrative order DHC–2190 to downhole commingle the Skaggs Abo gas pool and the Monument Tubb pool. The Britt B, Well #28 previously produced from the Skaggs Abo pool and it was plugged off and completed in the Monument Tubb pool. The Skaggs Abo pool produces gas only at this location with a gas gravity and BTU content of 0.66 and 1100 BTU's respectively. This reported gas composition was taken from the Britt B, Well #27 well, which is an 80 acre offset to Well #28. The Britt B, Well #28 well fluids and gas production will be allocated back to the well via well test at the Britt B battery. The GOR is not expected to exceed the 100,000 SCF/BBL limit requiring onsight metering at the Britt B, Well #28.

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