SPIRIT ENERGY OPERATIONS



OPERATIONS DEPARTMENT

FAX Cover Sheet

Pages (including cover)

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Date:	
To:	DAVID CATANACH
Company:	
Location:	
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From:	Tod PAUL
	Spirit Energy 76
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	Midland, Texas 79702
	FAX: 915/ 685-6703
Comments:	
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October 21, 1999

New Mexico Oil Conservation Division 1000 Rio Brazos Rd. Aztec, New Mexico 87410 Attn: David Catanach

> <u>Subject:</u> To amend Commingle Order PLC-90 Exception to Rule 303-A, surface commingling Rincon Unit Lateral #I Rio Arriba County, New Mexico

The following information is submitted to amend Union Oil Company of California's proviously approved surface commingling order PLC-90 for the Rincon Unit Lateral #1.

The Lateral #1 gathering system transports gas from 31 current and one proposed Rincon completion (see attachment 5a) to a central delivery point for compression. The wells produce through low-pressure separators for efficient liquid removal and have allocation meters at each location. Gas has been allocated back to each wellhore for years now on an umbru back. In reviewing the original PLC 00 it was noticed that the allocation formula was incorrectly based on an mef basis. It was believed that an amendment was **submitted for depreval** in 1996, however, Mr. David Gatanauli of the OCD has infinited one that no amendment to the Commingle order was to be found. Therefore, the attached exhibit #5 demonstrates the correct allocation of production at Lateral #1' the allocation formula that has been in use since the Lotaral #1 compressor has gone on line.

Also, in reviewing the approved commingle order PLC-90 dated 7/29/92 a type was noted. At the bottom of page 1 a reference is made to Rincon Unit-Lateral-No. 1 Tract 30 - First, there is no Tract 30 in Rincon. Second, the legal description which follows is the exact legal description of Tract 10 which was indeed a part of the original Lateral #1 surface commingle application. Hence the type -30 should have been 10. For reference another map of the Rincon Unit with Tract #'s has been included.

Should you have any questions or need any additional information, please contact Ted Paul (915) 685-6889.

Very truly yours,

Union Oil Company of California dba Unocal

Diane Van Deventer Field Superintendent

CC: BLM - attn: Jim Lavato

1004 North Big Spring • 111 Office Box 3100 • Midland, Texas 79702

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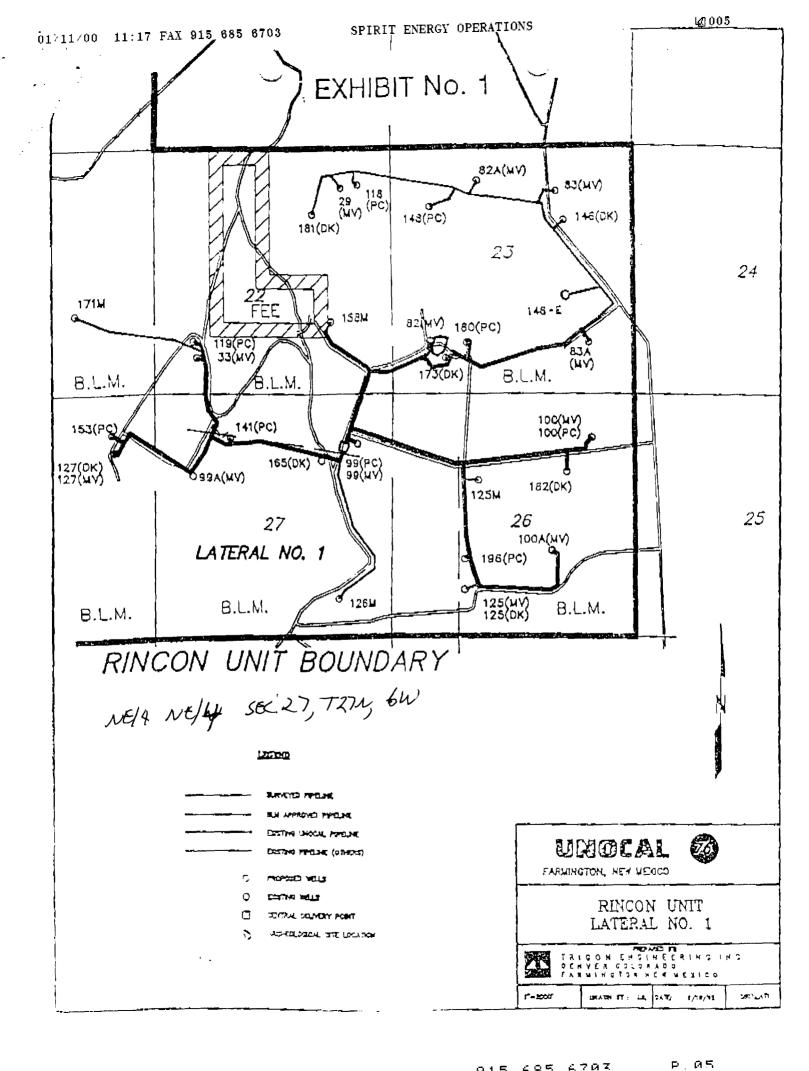
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Exhibit #5a

Wells producing into Lateral #1 Central Delivery Point

<u>well</u>	formation	
125	DK	
127	DK	
146	DK	
165	DK	
173	DK	
181	DK	
182	DK	
182 E	DK/GL	
126 M	DK/MV	
158 R	DK/MV	proposed well
100	MV	
100 A	MV	
125	MV	
127	MV	
158 M	MV	
29	MV	
33	MV	
82	MV	
82 A	MV	
83	мV	
83 A	MV	
99	MV	
99 A	мv	
100	PC	
118	PC	
119	PC	
141	PC	
148	PC	
153	PC	
160	PC	
196	PC	
99	PC	

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Exhibit #5

GAS ALLOCATION CALCULATIONS

Lateral 1

1)	Integrated Central Meter Volume	MV		mcf/mo
2)	Central Meter gas BTU	₿		
3)	Central Meter mmBTU	CM ≈	=MV ⁺ B	mmBTU

				Well	allocated
	integrated	sample	metered	allocation	sales
<u>Well</u>	<u>mcf/mo</u>	<u>btu</u>	<u>mmbtu/mo</u>	<u>factor</u>	<u>mmbtu/mo</u>
1	a1	b1	a1*b 1	AF1	CM * AF1
2	a2	b2	a2*b2	AF2	CM * AF2
4					
n	an	бп	an*bn	AFn	CM * AFn

example well allocation factor

Production shall be allocated to each lease on an mmbtu basis by multiplying the total central delivery point mmbtu (CM in above example) by an allocation factor. The allocation factor shall be determined by dividing the individual allocation meter mmbtu by the sum of the individual allocation meter mmbtu by the sum of the individual allocation meter mmbtu by the sum of the

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