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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING)
CALLED BY THE OIL CONSERVATION)
DIVISION FOR THE PURPOSE OF)
CONSIDERING:) CASE NO. 11181
APPLICATION OF ENRON OIL & GAS COMPANY

TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

ORIGINAL

BEFORE: David Catanach, Hearing Examiner

January 5, 1995

Santa Fe, New Mexico

JAN 6 1995

This matter came on for hearing before the Oil Conservation Division on January 5, 1995, at 2040 South Pacheco, Santa Fe, New Mexico, before Diana S. Abeyta, RPR, Certified Court Reporter No. 168, for the State of New Mexico.

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I N D E X

January 5, 1995
Examiner Hearing
CASE NO. 11181

PAGE

APPEARANCES

3

ENRON OIL & GAS COMPANY'S WITNESSES:

PATRICK J. TOWER

Examination by Mr. Carr

.4

Examination by Examiner Catanach

8

RANDY CATE

Examination by Mr. Carr

10

Examination by Examiner Catanach

22

REPORTER'S CERTIFICATE

24

E X H I B I T S

ID ADMTD

Exhibit 1

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Exhibit 2

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Exhibit 3

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Exhibit 4

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Exhibit 5

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Exhibit 6

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Exhibit 7

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Exhibit 8

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Exhibit 9

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Exhibit 10

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A P P E A R A N C E S

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FOR THE DIVISION: RAND CARROLL, ESQ.
 Legal Counsel
 Oil Conservation Division
 2040 S. Pacheco
 Santa Fe, New Mexico 87505

FOR THE APPLICANT: CAMPBELL, CARR, BERGE & SHERIDAN, P.A.
 Post Office Box 2208
 Santa Fe, New Mexico 87504-2208
BY: WILLIAM F. CARR, ESQ.

1 EXAMINER CATANACH: At this time, we'll call Case
2 11181. Application of Enron Oil & Gas Company for pool
3 creation and downhole commingling, Eddy County, New Mexico.
4 Are there appearances in this case?

5 MR. CARR: May it please the Examiner, my name is
6 William F. Carr with the Santa Fe law firm of Campbell,
7 Carr, Berge & Sheridan. We represent Enron Oil & Gas
8 Company in this case. I have two witnesses, Patrick
9 J. Tower, landman, and Randy Cate, reservoir engineer. Both
10 have previously testified today. They are under oath.
11 Their qualifications have been accepted, and I would request
12 that the record in this case so reflect.

13 EXAMINER CATANACH: The records shall so reflect,
14 Mr. Carr.

15 PATRICK J. TOWER
16 the witness herein, after having been first duly sworn
17 upon his oath, was examined and testified as follows:

18 EXAMINATION

19 BY MR. CARR:

20 Q. Mr. Tower, are you familiar with the application
21 filed in this case on behalf of Enron Oil & Gas Company?

22 A. Yes, I am.

23 Q. Are you familiar with the status of the lands in
24 the subject area?

25 A. Yes, I am.

1 Q. Could you briefly state what Enron seeks with
2 this application?

3 A. Enron is seeking the creation of a new pool for
4 the production of oil from the Wolfcamp formation,
5 comprising the NE 1/4 of the NE 1/4 of Section 36, Township
6 22 South, Range 30 East. We further seek authority to
7 downhole commingle the Wolfcamp and Bone Spring production
8 within Enron's existing James Ranch Unit Well No. 71, which
9 is located 330 feet from the North line and 660 feet from
10 the East line of Section 36 of that same township and range
11 and within the same quarter-quarter section of the request
12 for the new oil pool in the Wolfcamp.

13 Q. Would you refer to what has been marked for
14 identification as Enron Exhibit No. 1, the acreage plat --

15 A. Yes.

16 Q. -- and review the information on this?

17 A. Okay. Exhibit No. 1, again, is a land plat. The
18 arrow depicts the location of the James Ranch Unit No. 71
19 Well. And the red outline depicts the proration units and
20 the application for the pool surrounding the well. This
21 acreage lies within the Federal James Ranch Unit boundary.
22 These are state lands upon which this particular well is
23 located. Surrounding this also, and circled on the map, it
24 shows the offset operator to the north is Mitchell Energy.
25 Directly east, all of those lands lie within the WIPP site,

1 controlled by the DOE. However, in the N 1/2 of Section 31,
2 Conoco is the record lessee as to depths that have not been
3 condemned which are below 6,000 feet.

4 In Section 36, Enron is the operator there for
5 the drilling of wells. However, at the establishment of a
6 participating area within the Federal Unit, at such time
7 then Bass Enterprises Production Co., who is our partner,
8 takes over as the unit operator of the wells.

9 Q. Let's move to Enron Exhibit No. 2. Would you
10 identify and review that.

11 A. Exhibit No. 2 is the ownership breakdown within
12 the tract in question, being the NE NE of this Section 36.
13 As you can see, there are no overrides. The royalty is
14 one-eighth to the State of New Mexico. The remainder is
15 owned two-thirds by Enron and the balance by --
16 collectively, as I've depicted here -- the Bass group, which
17 is represented by their operator, which is Bass Enterprises
18 Production Company.

19 Q. And so the ownership is identical in both the
20 Wolfcamp and Bone Springs formations under the subject
21 tract?

22 A. Yes, it is uniform throughout all depths in this
23 tract.

24 Q. Now, Mr. Tower, if in fact one or either of these
25 zones is included in a participating area in the James Ranch

1 Unit, that could actually affect the ownership and the
2 production from the well?

3 A. Yes, it could; however, at this point, we have
4 had discussion both with the BLM and the state land office
5 geologist. More than likely the recommended P.A. will be
6 this 40-acre tract. If, in fact, there are P.A.'s later
7 that change the ownership, which would have to extend
8 outside the N 1/2 of this section for that to occur, there
9 will be proper allocation methods for the production so that
10 if there were differing ownerships, the correlative rights
11 would not be impaired, and both the BLM and the state have
12 indicated to us that that would be feasible. And Mr. Cate
13 will allude to some of the methods of production testing to
14 handle that.

15 Q. Is Exhibit No. 3, a copy of an affidavit
16 confirming that notice of this application hearing date has
17 been provided to all the affected offsetting owners?

18 A. Yes.

19 Q. Including the Department of Energy?

20 A. This is correct.

21 Q. And the copies of letters are attached, as well
22 as the copies of the return receipts?

23 A. Yes.

24 Q. Were Exhibits 1 through 3 prepared by you or
25 compiled at your direction?

1 history is garnered from the well, and all that's to be
2 established at a later date.

3 Q. Do you have any idea when that might occur?

4 A. Generally, we've got a number of other wells
5 we've drilled in this unit with Bass; a lot of them we
6 operate initially. Some -- they generally like to run it
7 out approximately six months to establish production history
8 if it's relatively -- the first Bone Spring and that
9 immediate area before they decide.

10 Q. Is there going to be additional Wolfcamp or Bone
11 Spring drilling in this unit?

12 A. There likely will be. However, to the east there
13 will not be because of the WIPP. To the north there is a --
14 we'll point out and Mr. Cate will talk about further -- the
15 north offset shows in the S 1/2 of Section 25 is a well that
16 Mitchell drilled, I believe within the last six months or
17 year, to the Morrow. And they have recompleted that as a
18 Wolfcamp gas well. With the S 1/2 of Section 25 allocated
19 to it.

20 Further plans by Enron and Bass would entail
21 possibly drilling some additional wells that would be to the
22 south, in Section 36, depending on how the well holds up
23 here that we're talking about. So there could be some,
24 however, for the most part, Bass and Enron are the majority
25 owners in those cases. And all of Section 36 is one state

1 lease, as far as the royalty.

2 So in the event there was additional drilling of
3 P.A.'s, generally, I don't see that many complexities with
4 the diversity of ownership, if that's what you are getting
5 at.

6 Q. Mr. Tower, have you communicated at all with the
7 Commissioner of Public Lands, as per your downhole
8 commingling application?

9 A. We have sent notice -- Mr. Cate -- I may defer
10 this to Mr. Cate. On a previous trip, he has visited with
11 the state land office and their personnel directly, and I
12 defer that to his conversations.

13 EXAMINER CATANACH: Okay. I have nothing
14 further.

15 THE WITNESS: Okay.

16 MR. CARR: All right. At this time we call Randy
17 Cate.

18 RANDY CATE,
19 the witness herein, after having been first duly sworn
20 upon his oath, was examined and testified as follows:

21 EXAMINATION

22 BY MR. CARR:

23 Q. Mr. Cate, are you familiar with the application
24 filed in this case on behalf Enron Oil & Gas Company?

25 A. Yes, I am.

1 Q. Have you made a technical study of the area and
2 prepared exhibits to support this application?

3 A. Yes, I have.

4 Q. Initially, have you visited with representatives
5 of the Commissioner of Public Lands concerning Enron's
6 proposals for downhole commingling of the Bone Springs and
7 the Wolfcamp in the subject well?

8 A. Yes, I have.

9 Q. When did that occur approximately?

10 A. It occurred approximately October 27th or 28th,
11 when we were up here for other hearings.

12 Q. And you personally met with the representatives
13 of the state land office?

14 A. Yes.

15 Q. And you advised them of your intention to
16 downhole commingle in this particular wellbore?

17 A. Yes, we did.

18 Q. Let's go to Exhibit No. 4. Could you identify
19 that, please.

20 A. Yes. Exhibit No. 4 is a cross-section with two
21 wells. At the bottom of the cross-section there is a
22 locator map, but it shows two wells. We had some --

23 Q. Are these the only two Wolfcamp producers in the
24 area?

25 A. Yes, in the immediate area that I know of, that's

1 correct.

2 Q. One of the wells is the Mitchell Apache No. 25
3 Federal Com. No. 2 Well; is that right?

4 A. Yes, it is.

5 Q. Where is that well located?

6 A. It is located approximately a quarter mile north
7 of our James Ranch 71. It's located in the SE of the SE of
8 Section 25.

9 Q. And is that well the one well completed in the
10 recently created Los Medanos Wolfcamp pool?

11 A. Yes.

12 Q. What are the boundaries of that pool?

13 A. J. They are the S 1/2 of Section 25.

14 Q. Is this producing as a gas well or an oil well?

15 A. It is producing as a gas well and the pool is so
16 designated.

17 Q. Generally, what are the characteristics of the
18 formation from which this gas is being produced?

19 A. If you look at the cross-section, at the very
20 bottom it's -- where we've got called "Lower Wolfcamp
21 Carbonate Pay," you have a sequence of shale and carbonates
22 over this perforated interval from approximately 11,800 feet
23 to 12,160 feet. And it's the carbonates within the sequence
24 that are producing the gas and some associated condensate.

25 Q. Now, Mr. Cate, if a new pool is not created for

1 the James Ranch Unit 71 Well, in fact, it would be governed
2 by the gas rules that have been adopted for the Los Medanos
3 Wolfcamp pool; is that right?

4 A. Yes.

5 Q. And that is the reason we're here today seeking
6 the creation of a separate pool within the Wolfcamp for the
7 James Ranch Unit 71 Well?

8 A. That's correct.

9 Q. Would you review the other factors that can be
10 testified to from Exhibit No. 4.

11 A. We believe that the data here shows that we are
12 asking for a separate pool in the Wolfcamp based on vertical
13 relief and also the production from our well, which is to
14 the right, the No. 71 in the Wolfcamp set of perforations,
15 is from what we call "Upper Wolfcamp Sand." And so it is a
16 sand, and then there is approximately 700 feet of vertical
17 separation between the sands down to the Lower Wolfcamp
18 carbonate pay that is in the designated Wolfcamp 320 gas
19 pool.

20 You know, we can refer to this as we go on with
21 some of the other exhibits, but primarily, we will be asking
22 that we designate this Wolfcamp oil pool for the 40-acre oil
23 pool rules, and then downhole commingle it with the third
24 Bone Spring sand pay, which is approximately 100 feet above
25 it.

1 Q. Basically, your conclusion is that you have a
2 separate pool in the Wolfcamp because this well produces oil
3 and the offset produces gas?

4 A. Yes, that's one of the reasons.

5 Q. There is 700 feet of vertical separation between
6 the producing intervals within the Wolfcamp?

7 A. Right.

8 Q. And one is producing from a carbonate string and
9 the other is producing from sand?

10 A. From sands, yes.

11 Q. Let's go to Exhibit No. 5, and I will ask you to
12 identify that for Mr. Catanach.

13 A. Exhibit No. 5 I prepared, and it follows an
14 outline as set in the commission's Rule 303-C, part 2. And
15 so what I've done here is summarize the data and the answers
16 to the Rule 303 -- as they are set out in Rule 303-C.

17 Q. All right. From what depth does the Wolfcamp
18 actually produce in this well?

19 A. We've got the Wolfcamp perforations at 11,091
20 feet to 11,124 feet.

21 Q. And at what rate, approximately, is it now
22 producing?

23 A. The current production is approximately 85
24 barrels per day, and this is the commingled rate.

25 Q. And so this figure still exceeds the limit set in

1 Rule 303 for administrative approval for downhole
2 commingling?

3 A. Yes, it does. We'll show an exhibit here that
4 shows the well is still in fairly rapid decline, and I would
5 imagine that within one to two months that it would have
6 fallen below the 80 barrel a day for administrative
7 approval.

8 Q. In Exhibit No. 5, have you set forth a resume of
9 this particular well's history?

10 A. Yes, I have.

11 Q. Would you review the pertinent parts of that
12 history for the Examiner.

13 A. Okay. This is on the first page. We spud the
14 well on September 14th, '94, and TD'd it at 11,250 feet on
15 October 6th. We first perforated the Wolfcamp sand at
16 11,091 feet to 11,124. Acidized with 2,000 gallons of acid
17 and swabbed back 88 barrels of load water and 5 barrels of
18 oil with a good show of gas. We then set a retrievable
19 bridge plug at 11,006 feet. Perforated the Bone Spring
20 sands from 10,880 feet to 10,938. Acidized it with 2,000
21 gallons. We swabbed 145 barrels of load back, and 26
22 barrels of new oil. It was then shut in for a pressure
23 build up, then the retrievable plug pulled. And both sands
24 fracture stimulated together with 125,000 gallons of
25 Medallion fluid and 325,000 pounds of 20/40 sand.

1 On November 5th, 1994, we potentialled the well
2 for 169 barrels of oil, 295 mcf, and 45 barrels of water per
3 day flowing up the casing at 640 pounds on an 18/64 choke.

4 Q. Mr. Cate, would you refer to Enron Exhibit No. 6
5 and review for Mr. Catanach the current producing
6 capabilities of this well.

7 A. No. 6 is the C-116, as required by the Rule 303 --
8 or requested. And it shows a test within the last 30 days
9 on 12-7-94, of flowing pressure of 100 pounds, 24-hour test,
10 and the recovered production during that time of 85 barrels
11 of oil, 218 mcf of gas and 45 barrels of water on a 24-hour
12 basis.

13 Q. Would you now go to Exhibit No. 7 and identify
14 that and review the information on this exhibit for the
15 Examiner.

16 A. No. 7 is what I referred to earlier. This is a
17 31-day gauge report that we generate. And at the very
18 bottom you can see some of the tests are in the 85, still
19 about an 85- to 90-barrel-per-day rate, but earlier in the
20 month, up midway in the page, we had several days over 100
21 barrels per day. So this is mainly to show that we're still
22 above the limits set for administrative approval. But I
23 would anticipate, and we'll show a decline rate here in a
24 minute, that we'll be under the 80-barrel-a-day rate very
25 shortly.

1 Q. Does Exhibit No. 5 contain a forecast of the
2 well's producing capability?

3 A. Yes, it does. On page 2, I have forecast that we
4 should expect a hyperbolic decline, and I'd expect, based on
5 offset production out of the Bone Spring, that we would
6 stabilize in the 40- to 60-barrel-per-day range and then
7 begin more of a terminal decline, say in the 15 to 20
8 percent per year.

9 Q. Would you refer to Enron Exhibit No. 8 and simply
10 review for Mr. Catanach how you went about determining that
11 production forecast.

12 A. Exhibit No. 8 is an offset well, it's the James
13 Ranch Unit No. 7 that Bass operates, and it's Bone Spring
14 production. It's down in Section 7 to the southeast, one
15 mile southeast of this well. And it's the only Bone Spring
16 well in the area with any appreciable history. The well
17 began producing on a continuous basis back in the early '80s
18 and has produced for approximately 15 years or so. And so
19 it shows the initial rapid decline and then stabilizing out,
20 and that's what I based this previous forecast on.

21 Q. Are both zones in the well flowing, or are they
22 being artificially lifted?

23 A. They are both flowing.

24 Q. Does Exhibit No. 5 contain bottomhole pressure
25 data on each of these zones?

1 A. Yes. Page 2, in the middle of the page, we
2 actually had a measured bottomhole pressure that I referred
3 to earlier in reading the resume of the testing, and it gave
4 an original pressure for the Bone Springs sand of 7,588 psi
5 absolute, and that's from a build-up analysis. Now, the
6 Wolfcamp sands, we have a flowing bottom-up pressure, plus
7 some data from acid jobs, shut-in pressures after acid jobs.
8 I don't have an actual measure, but I have inferred from a
9 gradient that it will be approximately 7,727 pounds. Around
10 150 pounds difference in the bottomhole pressure between the
11 two.

12 And then we do have a measured flowing bottomhole
13 pressure at the time we ran a production survey for
14 allocation purposes, and it showed only 100 pounds
15 difference between the two zones in the flowing bottomhole
16 pressures. That both the shut-ins and the flowing pressures
17 indicate there should be no cross-flow between zones, either
18 wind shut in or wind flowing.

19 Q. Mr. Cate, do you anticipate any problems with the
20 compatibilities of the fluids in the wellbore?

21 A. No. Martin Water Labs, which is Exhibit No. 9,
22 they analyzed the water from the combined stream and find no
23 evidence of any incompatibilities. Also, both oils are
24 sweet and almost identical gravities. The combined stream
25 gravity is 43.1 API, and in comparing with our James Ranch

1 No. 17, which is Bone Spring only, it's gravity is 44.0, so
2 very similar.

3 Q. Mr. Cate, would you refer to what has been marked
4 as Enron Exhibit Number 10. Identify this, review it, and
5 in so doing, explain to the Examiner how you would recommend
6 that the production be allocated between the Wolfcamp and
7 the Bone Spring in the subject well.

8 A. Okay, Exhibit Number 10 is the production log.
9 We had Halliburton run this for us. It was run on 12/7/94,
10 December 7th. And at the time, both zones were flowing
11 together. We ran a suite of logs. What they do is they run
12 spinner surveys and then gradiometers and tools that will
13 measure the changes in density of fluids, and we can arrive,
14 through a software program, arrive at the volumes of oil,
15 water and gas from each of the zones.

16 And what is depicted here is a visual
17 representation of that. As can be seen, the green, dark
18 green, and then light green in the middle columns here are
19 showing that the Wolfcamp perforations at the bottom were
20 contributing approximately anywhere around 60 barrels per
21 day average at the time, up to possibly 80.

22 And then the upper set of perfs was contributing
23 another 10 to 20 barrels of the oil. Most of the water
24 coming from the bottom set of perfs. And the gas, most of
25 the gas coming from the upper set of perfs, but on the gas,

1 I believe what we are seeing there is some of the solution
2 gas coming out of the solution. The bubble point should be
3 in the 3,000-pound range. The flowing bottomhole at that
4 point recorded was 2,700 pounds. These oils should have all
5 its gas in solution. There should not be a gas cap.

6 And at the very top of the page on the production
7 log heading, under "Remarks," they broke out the percentages
8 of each of the fluids between the top zone and the bottom
9 zone, and give a range, and, again, they showed that the
10 gas, 95 to 100 percent coming from the top zone. But,
11 again, I think that is strictly gas coming out of solution.
12 And so the oil, 10 to 20 percent, and the water, 10 to 20
13 percent out of the top zone. The oil from the bottom zone
14 is 80 to 90 percent. And the water 80 to 90 percent.

15 I took that data, and on page 3 of the outline,
16 according to Rule 303, I give the formula for allocation of
17 production between the zones. And I felt that the Bone
18 Spring oil, based on this log and knowing the offset
19 production characteristics, the Bone Spring should have 20
20 percent of the oil, 20 percent of the gas, and 20 percent of
21 the water allocated to it, and the Wolfcamp should have 80
22 percent of the oil, 80 percent of the gas, and 80 percent of
23 water allocated to it initially.

24 Q. You said "initially," is it possible that as the
25 well produces, these percentages could change?

1 A. It's possible. If we see a sudden change in
2 production characteristics, we would run another production
3 survey and --

4 Q. Could you recommend that the actual allocation
5 between these two zones be worked out with the Oil
6 Conservation's district office, and that if there are
7 changes, you be permitted to adjust those, thereby having
8 flexibility necessary to accurately allocate between the two
9 zones?

10 A. Yes, I would.

11 Q. In your opinion, would approval of the
12 application result in the increased recovery of oil?

13 A. Yes, it will.

14 Q. Will the value of the commingled production
15 exceed the value of the production from each of the
16 individual zones?

17 A. It does on a present value basis, and the fact
18 that the oil gravities are almost identical, there is not
19 any quality subtraction on our oil price due to the
20 combination.

21 Q. In your opinion, will the approval of this
22 application be in the best interest of conservation, the
23 prevention of waste, and the protection of correlative
24 rights?

25 A. Yes.

1 Q. Were Exhibits 4 through 10 either prepared by you
2 or compiled under your direction and supervision?

3 A. Yes, they all were.

4 MR. CARR: At this time, Mr. Catanach, we move
5 the admission of Enron Exhibits 4 through 10.

6 EXAMINER CATANACH: Exhibits 4 through 10 will be
7 admitted as evidence.

8 MR. CARR: That completes my direct examination
9 of Mr. Cate.

10 EXAMINATION

11 BY EXAMINER CATANACH:

12 Q. Mr. Cate, the 71 well did not penetrate that
13 lower Wolfcamp gas?

14 A. That's correct. It TD'd at 11,250 feet, some 500
15 feet above Wolfcamp gas zones.

16 Q. Does Enron have any plans to deepen that well?

17 A. No. From what we understand, the offset well is
18 somewhere in the 100-mcf-a-day range, and we would not find
19 that economical to pursue.

20 Q. You mentioned that you had talked to the
21 Commissioner of Public Lands. Have you submitted an
22 application to them?

23 A. We submitted a letter that I think you received a
24 a copy, and we also copied them on a letter that explained
25 and requested this downhole commingling testing and

1 explained that we would be going to hearing to get approval,
2 and they had no problem with that.

3 EXAMINER CATANACH: I have nothing further,
4 Mr. Carr.

5 MR. CARR: We have nothing further in this case,
6 Mr. Catanach.

7 EXAMINER CATANACH: There being nothing further
8 in this case, Case 11181 will be taken under advisement.

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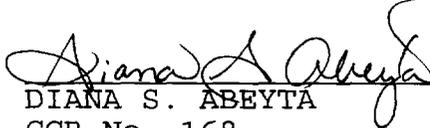
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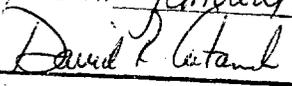
STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Diana S. Abeyta, Certified Shorthand Reporter and Notary Public, HEREBY CERTIFY that I caused my notes to be transcribed under my personal supervision, and that the foregoing transcript is a true and accurate record of the proceedings of said hearing.

I FURTHER CERTIFY that I am not a relative or employee of any of the parties or attorneys involved in this matter and that I have no personal interest in the final disposition of this matter.

WITNESS MY HAND AND SEAL, January 24th, 1995.


DIANA S. ABEYTA
CCR No. 168

I do hereby certify that the foregoing is a complete and true transcript of the proceedings in the Examiner hearing of Case No. 11181, heard by me on January 5 1995.

David R. Catanzano, Examiner
Oil Conservation Division

BASS ENTERPRISES PRODUCTION CO.

201 MAIN ST.

FORT WORTH, TEXAS 76102-3131

817/390-8400

January 3, 1995

New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

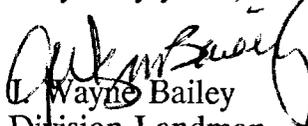
Attention: Mr. David R. Catanach

Re: Application for Downhole Commingling
Wolfcamp and Bone Spring Formations
James Ranch Unit No. 71 Well
Section 36, T22S-30E
James Ranch Unit
Eddy County, New Mexico

Dear Mr. Catanach:

Please reference Enron's application for the creation of a new oil pool designation for the Wolfcamp Formation and downhole commingling of production from the Wolfcamp and the Bone Spring Formations in the above wellbore, said case having been set for the examiner's hearing on January 5, 1995. Please be advised that Bass Enterprises Production Co. hereby supports said application by Enron. According to Bass' review, the commingling of the above zones in the James Ranch No. 71 Well will not cause damage to the reservoir or loss of correlative rights by any interested parties. Please add this letter to the official record for the subject application. Thank you very much and in the event you have any questions or comments in the above regard, please advise.

Very truly yours,


L. Wayne Bailey
Division Landman

JWB:ca

cc: William F. Carr
P.O. Box 2208
Santa Fe, New Mexico 87504-2208

Enron Oil and Gas Company
4000 N. Big Spring, Suite 500
Midland, Texas 79702
Attention: Patrick J. Tower