



P.O. Box 552
Midland, Texas 79702
Telephone 915/682-1626

July 28, 1995

Mr. William J. LeMay
Oil Conservation Division
Energy, Minerals and Natural Resources Department
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Prorated Gas Allowables for October 1995 through March 1996 Period
Indian Basin Upper Penn Pool
Eddy County, New Mexico

Dear Mr. LeMay,

Marathon Oil Company operates fifteen active gas wells and owns a working interest in eight other wells in the Indian Basin Upper Penn Pool. Although Marathon does not intend to present testimony at the August 3 hearing, we support the Oil Conservation Division's proposed non-marginal well allowable rate of 200,000 MCF per month as set forth in your preliminary market demand and allowable determination schedule.

Marathon has made significant investments for production equipment and development work to maximize production capacity from the Indian Basin Upper Penn wells. The allowable of 200,000 MCF per month will allow us to continue making investments to maximize recovery from the field. In addition, we recognize that the proposed allowable is a continuation of the Commissions' findings during the prior six proration periods. We believe maintaining this allowable rate will permit equitable sharing of gas produced between the owners in the pool based on current well deliverabilities.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'R. A. Biernbaum'.

R. A. Biernbaum
Project Manager
Indian Basin Asset Team

xc: Chevron USA (Michelle L. LeVan)
Oryx Energy Company (Mark A. Peavy)
Texaco E&P (Kirk Spilman)

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