



**ORYX** ENERGY

13155 Noel Road  
Dallas TX 75240-5067  
PO Box 2880  
Dallas TX 75221-2880  
214 715 4000

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February 13, 1996

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

RE: Prorated Gas Allowable for April 1996 through September 1996 Period  
Indian Basin Upper Penn Pool  
Eddy County, New Mexico

Dear Mr. LeMay:

Oryx Energy Company operates six active gas wells and owns a working interest in four other wells in the Indian Basin Upper Penn Pool. Although Oryx does not intend to present testimony at the February 15 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.

Oryx 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 Commission's findings during the prior seven probation 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,

Mark A. Peavy  
Operations Engineer

c: Chevron USA (Michelle LeVan)  
Marathon (R. A. Bierabaum)  
Texaco E & P (Kirk Spilman)