



May 19, 1999

David Catanach
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Re: Surface Commingling
E.W. Walden Lease
Lea County, New Mexico

Dear Mr. Catanach:

Anadarko (OGRID 000817) requests administrative approval for an exception to Rule 303-A to permit downhole commingling of the Grayburg and San Andres oil-oil zones in the wellbore of E.W. Walden #12. The well is located in Section 15 - T22S- R37E in Lea County, New Mexico. Exhibit 1 is a map of the EW Walden lease. This lease currently has 8 active producers in the Grayburg formation.

The EW Walden #12 is currently producing in the Grayburg at a rate of 1 BOPD, 2 BWPD and 23 MCFPD. This well is currently at its economic limit and if the commingling is approved, additional reserves could be recovered from the Grayburg formation. The San Andres was perforated and tested briefly in 1982 at a rate of about 25 BOPD. If this application is approved both zones will be turned together and placed on sucker rod pump.

In the wellbore, the Grayburg zone is perforated from 3640-3843' and the San Andres zone is perforated from 3899-3976'. The current producing BHP is 120 psi for the Grayburg interval (based on fluid level analysis) and the BHP for the San Andres is 880 psi (based on Lou Wortham C#2 offset analogy). The pressure difference should not be a problem as we will attempt to keep both zones in the "pumped off" condition in the wellbore. In the event that crossflow should occur, the waters are compatible (attached water analysis) and combining the fluids should not result in the formation of formation damaging precipitates.

Based on the latest test in the Grayburg (4/99) and the last test in the San Andres (8/82) in this well, the well should initially produce 25-30 BOPD, 350 MCFPD and 250 BWPD. This combined rate was developed by using the allocation of 96.5% for the San Andres and 3.5 % for the Grayburg. These allocation factors were developed based on current and past production. A current production plot is included for the Grayburg interval as well as the brief production history for the San Andres interval.

At present the well is not involved in a secondary recovery project. If a future secondary recovery project were to be considered we foresee no problems with this commingling prospect jeopardizing the efficiency of a secondary project.

If commingling is approved, Anadarko Petroleum Corporation, will the operator of the said well located 2250' FNL & 1350' FWL, Sec 15, T22S, R37E, Lea County, New Mexico, Penrose Skelly Grayburg and Southwest Eunice San Andres. All working, overriding, and royalty interests are the same in the two commingled zones.

Surface Commingling
E.W. Walden Lease
May 19, 1999
Page 2 of 2

All offset operators have been notified of the proposed commingling by a copy of this letter. If you have any questions regarding this proposed action, please feel free to contact me at (915) 683-0559.

Sincerely,



Richard Lauderdale
Production Engineer

Attachments

cc: NMOCD - District I (Hobbs)
REL/Harold/Well File
Offset Operators (see attached list)

**ANADARKO PETROLEUM CORPORATION
Offset Operators List
E.W. Walden Lease
Lea County, New Mexico**

Collins & Ware, Inc.
Empire Plz.
508 W. Wall, Ste. 1200
Midland, Texas 79701-5076

Chevron U.S.A. Production Company
Box 1635
1301 McKinney
Houston, Texas 77251

Conoco, Inc.
10 Desta Dr., Ste. 100W
Midland, Texas 79705-4500

John H. hendrix
Box 3040
110 N. Marienfeld, Ste. 400
Midland, Texas 79701

ICA Energy, Inc.
Box 233
Odessa, Texas 79760-0233

Oryx Energy Co.
13155 Noel Rd.
Dallas, Texas 75221-2880

Wagner & Brown, LTD.
Box 1714
300 N. Marienfeld, Ste. 1100
Midland, Texas 79702

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505-6429

APPLICATION FOR DOWNHOLE COMMINGLING

APPROVAL PROCESS:

Administrative Hearing

EXISTING WELLBORE

YES NO

DISTRICT II
811 South First St., Artesia, NM 88210
DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410
DISTRICT IV
2040 S. Pacheco, Santa Fe, NM 87505

ANADARKO PETROLEUM CORPORATION P O BOX 2497 MIDLAND TX 79702
Operator Address
E.W. WALDEN 12 F - SEC 15-T225-R37E LEA
Lease Well No. Unit Ltr. - Sec - Twp - Rge County
Spacing Unit Lease Types: (check 1 or more)
OGRID NO. 000817 Property Code 001414 API No. 30-025-27756 Federal State (and/or) Fee X

1. Pool Name and Pool Code	PENROSE SKELLY GRAYBURG 50350	EUNICE; SAN ANDRES, SOUTHWEST 24180
2. Top and Bottom of Pay Section (Perforations)	3640-3843	3899-3976
3. Type of production (Oil or Gas)	OIL	OIL
4. Method of Production (Flowing or Artificial Lift)	ARTIFICIAL LIFT	ARTIFICIAL LIFT
5. Bottomhole Pressure Oil Zones - Artificial Lift: Gas & Oil - Flowing: All Gas Zones: Estimated Current Measured Current Estimated Or Measured Original	a. (Current) 120 BHP b. (Original)	a. b. FROM LOU WORTHAM: C#2 ANALOGY (ATTACHED) 880 PSI
6. Oil Gravity (EAPI) or Gas BTU Content	35.0° API	37.1° API
7. Producing or Shut-In?	PRODUCING	S1
Production Marginal? (yes or no) * If Shut-In, give date and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data. * If Producing, give date and oil/gas/water rates of recent test (within 60 days)	YES Date: Rates: Date: 4/20/99 Rates: 1 BOPD, 23 MCFPD, 2 BWPD	YES, IN OFFSETTING LSES Date: 08/82 Rates: 27 BOPD, 245 BWPD 330 MCFPD Date: Rates:
8. Fixed Percentage Allocation Formula - % for each zone (total of %'s to equal 100%)	Oil: 3.5 % Gas: 6.5 %	Oil: 96.5 % Gas: 93.5 %

9. If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data.
10. Are all working, overriding, and royalty interests identical in all commingled zones? ☒ Yes ☐ No
If not, have all working, overriding, and royalty interests been notified by certified mail? ☒ Yes ☐ No
Have all offset operators been given written notice of the proposed downhole commingling? ☒ Yes ☐ No
11. Will cross-flow occur? ☐ Yes ☒ No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. ☐ Yes ☐ No (If No, attach explanation)
12. Are all produced fluids from all commingled zones compatible with each other? ☒ Yes ☐ No
13. Will the value of production be decreased by commingling? ☐ Yes ☒ No (If Yes, attach explanation)
14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. ☐ Yes ☐ No
15. NMOC Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). _____
16. ATTACHMENTS:
* C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
* Production curve for each zone for at least one year. (If not available, attach explanation.)
* For zones with no production history, estimated production rates and supporting data.
* Data to support allocation method or formula.
* Notification list of all offset operators.
* Notification list of working, overriding, and royalty interests for uncommon interest cases.
* Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Richard Lauderdale TITLE Production Engineer DATE 5/19/99

TYPE OR PRINT NAME RICHARD LAUDERDALE TELEPHONE NO. (915)683-0559



NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102
 Supersedes C-128
 Effective 1-4-83

All distances must be from the outer boundaries of the Section

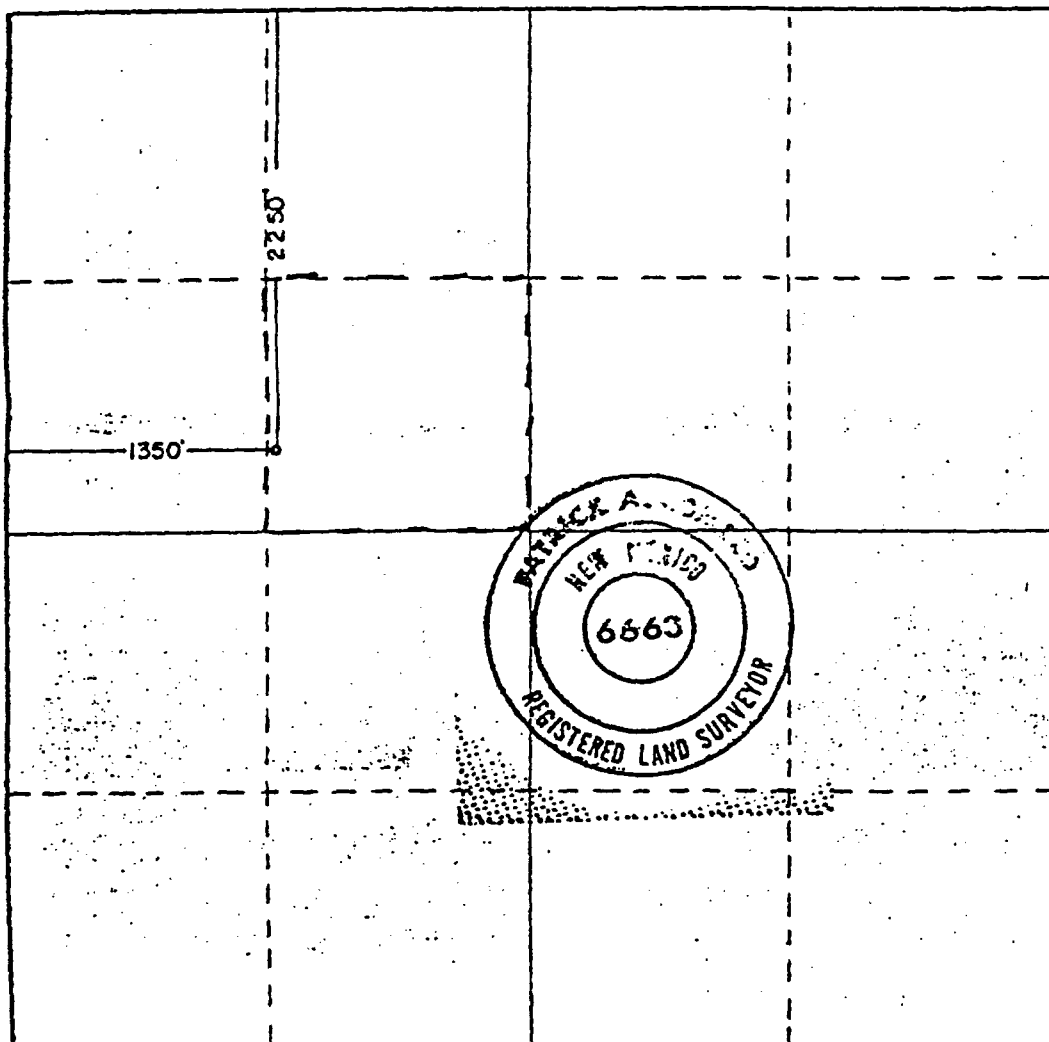
Operator ANADARKO PRODUCTION CO.		Lease E. W. WALDEN		Well No. 12
Tract Letter F	Section 15	Township 22 SOUTH	Range 37 EAST	County LEA
Actual Footage Location of Wells:				
2250	feet from the	NORTH	line and	1350 feet from the WEST line
Ground Level Elev. 3402.6	Producing Formation Grayburg SA		Pool Penrose Shelly (Pool Code) 50350	Dedicated Acreage: 40 Acres

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

☐ Yes ☒ No If answer is "yes," type of consolidation _____

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



REL 5/19/89 CERTIFICATION	
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.	
<i>John C. English</i>	
Name	John English
Position	Area Supervisor
Company	Anadarko Production Company
Date	February 17, 1982
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.	
Date Surveyed	2-11-82
Registered Professional Engineer and/or Land Surveyor	
<i>Patrick A. Romero</i>	
Certificate No.	JOHN W. WEST 878 PATRICK A. ROMERO 6863 Ronald J. Eldson 3239

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised October 18, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-025-27756		² Pool Code 24180		³ Pool Name UNDESINATED - EUNICE; SAN ANDRES, SOUTHWEST	
⁴ Property Code 001414		⁵ Property Name E.W. WALDEN			⁶ Well Number
⁷ OGRID No. 000817		⁸ Operator Name Anadarko Petroleum Corp.			⁹ Elevation 3402.6' GR

¹⁰ Surface Location									
UL or lot no. F	Section 15	Township 22S	Range 37E	Lot. Idn	Feet from the 2250	North/South Line NORTH	Feet from the 1350	East/West line WEST	County LEA

¹¹ Bottom Hole Location If Different From Surface									
UL or lot no.	Section	Township	Range	Lot. Idn	Feet from the	North/South Line	Feet from the	East/West line	County
¹² Dedicated Acres ¹³ Joint or Infill ¹⁴ Consolidation Code ¹⁵ Order No.									

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

<div style="position: relative; height: 400px;"> <div style="position: absolute; left: 10px; top: 50%; transform: translateY(-50%);">2250'</div> <div style="position: absolute; left: 50%; bottom: 10px; transform: translateX(-50%);">1350'</div> </div>	¹⁷ OPERATOR CERTIFICATION <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</i> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Richard Lauderdale</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Signature</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">RICHARD LAUDERDALE</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Printed Name</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">PRODUCTION ENGINEER</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Title</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">05/19/1999</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Date</div>			
	¹⁸ SURVEYOR CERTIFICATION <i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Date of Survey</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Signature and Seal of Professional Surveyor:</div>			
	<div style="border-bottom: 1px solid black; margin-bottom: 5px;">Certificate Number</div>			

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District I
PO Box 1980, Hobbs, NM 88241-1980
District II
PO Drawer DD, Artesia, NM 88211-0719
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

Form C-104
Revised October 18, 1994
Instructions on back
Submit to Appropriate District Office
5 Copies

☐ AMENDED REPORT

I. REQUEST FOR ALLOWABLE AND AUTHORIZATION TO TRANSPORT

¹ Operator name and Address Anadarko Petroleum Corp. P.O. Box 2497 Midland, TX 79702		² OGRID Number 000817
		³ Reason for Filing Code COMMINGLE DOWNHOLE
⁴ API Number 30-0 25-27756	⁵ Pool Name UNDESINATED - EUNICE; SAN ANDRES, SOUTHWEST	⁶ Pool Code 24180
⁷ Property Code 001414	⁸ Property Name E.W. WALDEN	⁹ Well Number 12

II. ¹⁰ Surface Location

UL or lot no. F	Section 15	Township 22S	Range 37E	Lot. Idn	Feet from the 2250	North/South Line NORTH	Feet from the 1350	East/West line WEST	County LEA
--------------------	---------------	-----------------	--------------	----------	-----------------------	---------------------------	-----------------------	------------------------	---------------

¹¹ Bottom Hole Location

UL or lot no. F	Section 15	Township 22S	Range 37E	Lot. Idn	Feet from the 2250	North/South Line NORTH	Feet from the 1350	East/West line WEST	County LEA
¹² Lse Code P	¹³ Producing Method Code P	¹⁴ Gas Connection Date	¹⁵ C-129 Permit Number	¹⁶ C-129 Effective Date	¹⁷ C-129 Expiration Date				

III. Oil and Gas Transporters

¹⁸ Transporter OGRID	¹⁹ Transporter Name and Address	²⁰ POD	²¹ O/G	²² POD ULSTR Location and Description
024650	DYNEGY MIDSTREAM SERVICES 6 DESTA DR., STE. 3300 MIDLAND, TX 79705	0454230	G	
020667	EQUILON PIPELINE CO., LLC HCR 1, BOX 89 DENVER CITY, TX 79323	0454210	O	
009171	GPM GAS CORPORATION PO BOX 50020 MIDLAND, TX 79710-0020	0454230	G	

IV. Produced Water

²³ POD	²⁴ POD ULSTR Location and Description
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V. Well Completion Data

²⁵ Spud Date 05/31/82	²⁶ Ready Date 07/04/82	²⁷ TD 4031	²⁸ PBTB 3890	²⁹ Perforations 3899-3976	³⁰ DHC, DC, MC
³¹ Hole Size 12-1/4"	³² Casing & Tubing Size 8-5/8" CSG	³³ Depth Set 1166'	³⁴ Sacks Cement 575 SX		
7-7/8"	5-1/2" CSG	4031'	680 SX		
			TEMP SVY - TOC @ 968'		
		2-3/8 TBG	3890'		

VI. Well Test Data

³⁵ Date New Oil	³⁶ Gas Delivery Date	³⁷ Test Date	³⁸ Test Length	³⁹ Tbg. Pressure	⁴⁰ Csg. Pressure
⁴¹ Choke Size	⁴² Oil	⁴³ Water	⁴⁴ Gas	⁴⁵ AOF	⁴⁶ Test Method
⁴⁷ I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information given above is true and complete to the best of my knowledge and belief. Signature: <i>Richard Lauderdale</i>			OIL CONSERVATION DIVISION		
Printed name: RICHARD LAUDERDALE			Approved by:		
Title: PRODUCTION ENGINEER			Title:		
Date: 05/19/1999			Approval Date:		
Phone: 915/683-0559					

⁴⁸ If this is a change of operator fill in the OGRID number and name of the previous operator

Previous Operator Signature	Printed Name	Title	Date
-----------------------------	--------------	-------	------

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District I
PO Box 1980, Hobbs, NM 88241-1980
District II
PO Drawer DD, Artesia, NM 88211-0719
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

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⁴ API Number 30-0 25-27756	⁵ Pool Name PENROSE SKELLY GRAYBURG	⁶ Pool Code 50350
⁷ Property Code 001414	⁸ Property Name E.W. WALDEN	⁹ Well Number 12

II. ¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot. Idn	Feet from the	North/South Line	Feet from the	East/West line	County
F	15	22S	37E		2250	NORTH	1350	WEST	LEA

¹¹ Bottom Hole Location

UL or lot no.	Section	Township	Range	Lot. Idn	Feet from the	North/South Line	Feet from the	East/West line	County
F	15	22S	37E		2250	NORTH	1350	WEST	LEA
¹² Lse Code P	¹³ Producing Method Code P	¹⁴ Gas Connection Date	¹⁵ C-129 Permit Number	¹⁶ C-129 Effective Date	¹⁷ C-129 Expiration Date				

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020667	EQUILON PIPELINE CO., LLC HCR 1, BOX 89 DENVER CITY, TX 79323	0454210	O	
009171	GPM GAS CORPORATION PO BOX 50020 MIDLAND, TX 79710-0020	0454230	G	

IV. Produced Water

²³ POD	²⁴ POD ULSTR Location and Description

V. Well Completion Data

²⁵ Spud Date 05/31/82	²⁶ Ready Date 07/04/82	²⁷ TD 4031	²⁸ PBTD 3890	²⁹ Perforations 3640-3843	³⁰ DHC, DC, MC
³¹ Hole Size 12-1/4"	³² Casing & Tubing Size 8-5/8" CSG	³³ Depth Set 1166'	³⁴ Sacks Cement 575 SX		
7-7/8"	5-1/2" CSG	4031'	680 SX		
2-3/8 T80		3890'	TEMP SVY - TOC @ 968'		

VI. Well Test Data

³⁵ Date New Oil	³⁶ Gas Delivery Date	³⁷ Test Date	³⁸ Test Length	³⁹ Tbg. Pressure	⁴⁰ Csg. Pressure
⁴¹ Choke Size	⁴² Oil	⁴³ Water	⁴⁴ Gas	⁴⁵ AOF	⁴⁶ Test Method
⁴⁷ I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information given above is true and complete to the best of my knowledge and belief. Signature: <i>Richard Lauderdale</i> Printed name: RICHARD LAUDERDALE Title: PRODUCTION ENGINEER Date: 05/19/1999			OIL CONSERVATION DIVISION Approved by: Title: Approval Date: Phone: 915/683-0559		

⁴⁸ If this is a change of operator fill in the OGRID number and name of the previous operator

Previous Operator Signature	Printed Name	Title	Date

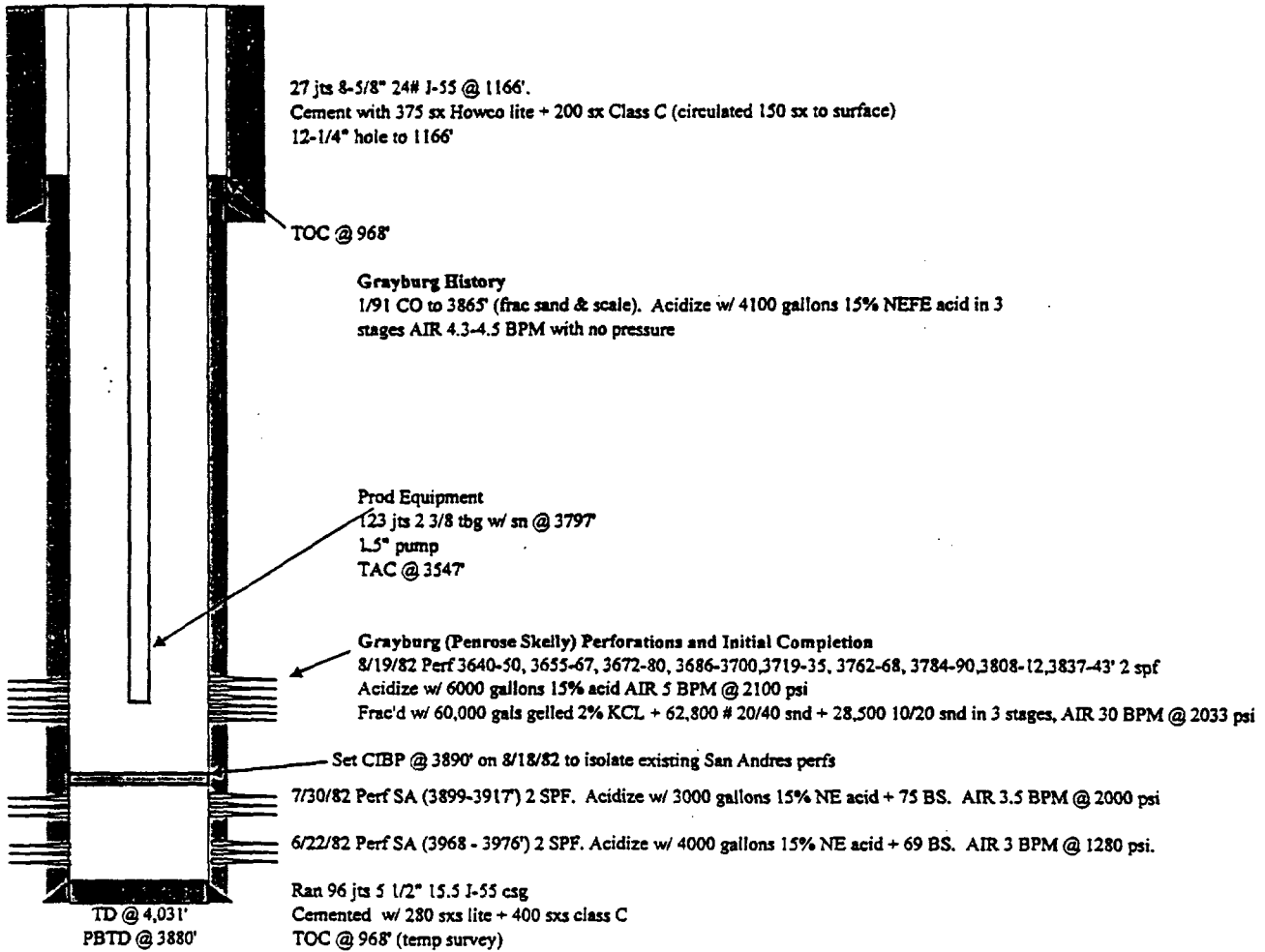
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E.W. Walden #12

Penrose Skelly (Grayburg) Oil Well

2250' FNL & 1350' FWL, Sec. 15, T22S, R37E, Lea County, New Mexico

Spudded 5/30/82



REL 5/19/99

RESULTS REPORTED 12-5-85

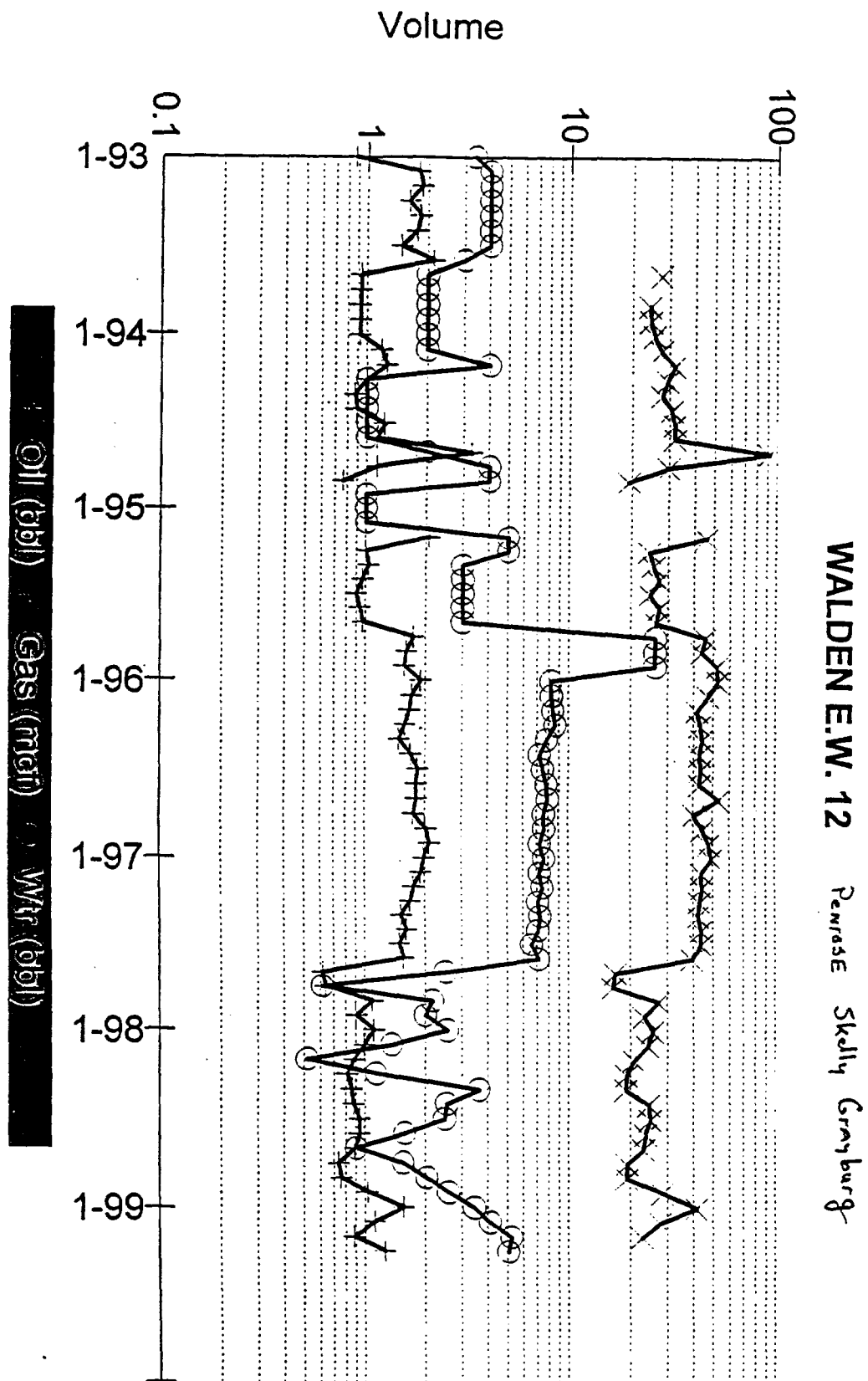
NO. 4

CHEMICAL AND PHYSICAL PROPERTIES

	NO. 1	NO. 2	NO. 3	NO. 4
Specific Gravity at 60° F.	1.0163	1.0114		
pH When Sampled				
pH When Received	7.59	7.02		
Bicarbonate as HCO ₃	2,367	2,245		
Supersaturation as CaCO ₃				
Undersaturation as CaCO ₃				
Total Hardness as CaCO ₃	780	1,475		
Calcium as Ca	92	296		
Magnesium as Mg	134	179		
Sodium and/or Potassium	5,706	3,989		
Sulfate as SO ₄	30	236		
Chloride as Cl	7,952	5,717		
Iron as Fe	2.8	0.04		
Barium as Ba	0	0		
Turbidity, Electric				
Color as Pt				
Total Solids, Calculated	16,281	12,661		
Temperature °F.				
Carbon Dioxide, Calculated				
Dissolved Oxygen, Winkler				
Hydrogen Sulfide	350	1,250		
Resistivity, ohms/m at 77° F.	0.510	0.540		
Suspended Oil				
Filtrable Solids as mg/l				
Volume Filtered, ml				

Results Reported As Milligrams Per Liter

Additional Determinations And Remarks A careful comparison of the above results clearly reveals
no evidence of any incompatibility between these two waters.



Oil
Gas
Water
Wells

Field: PENROSE SKELLY
Lease: E W WALDEN | Well #12
Operator: ANADARKO PETROLEUM CORPORATION
Production Rate vs Time
For the Period 01/1982 to 12/1998 | API: 30025277560000

BBI/Day or Mcf/Day

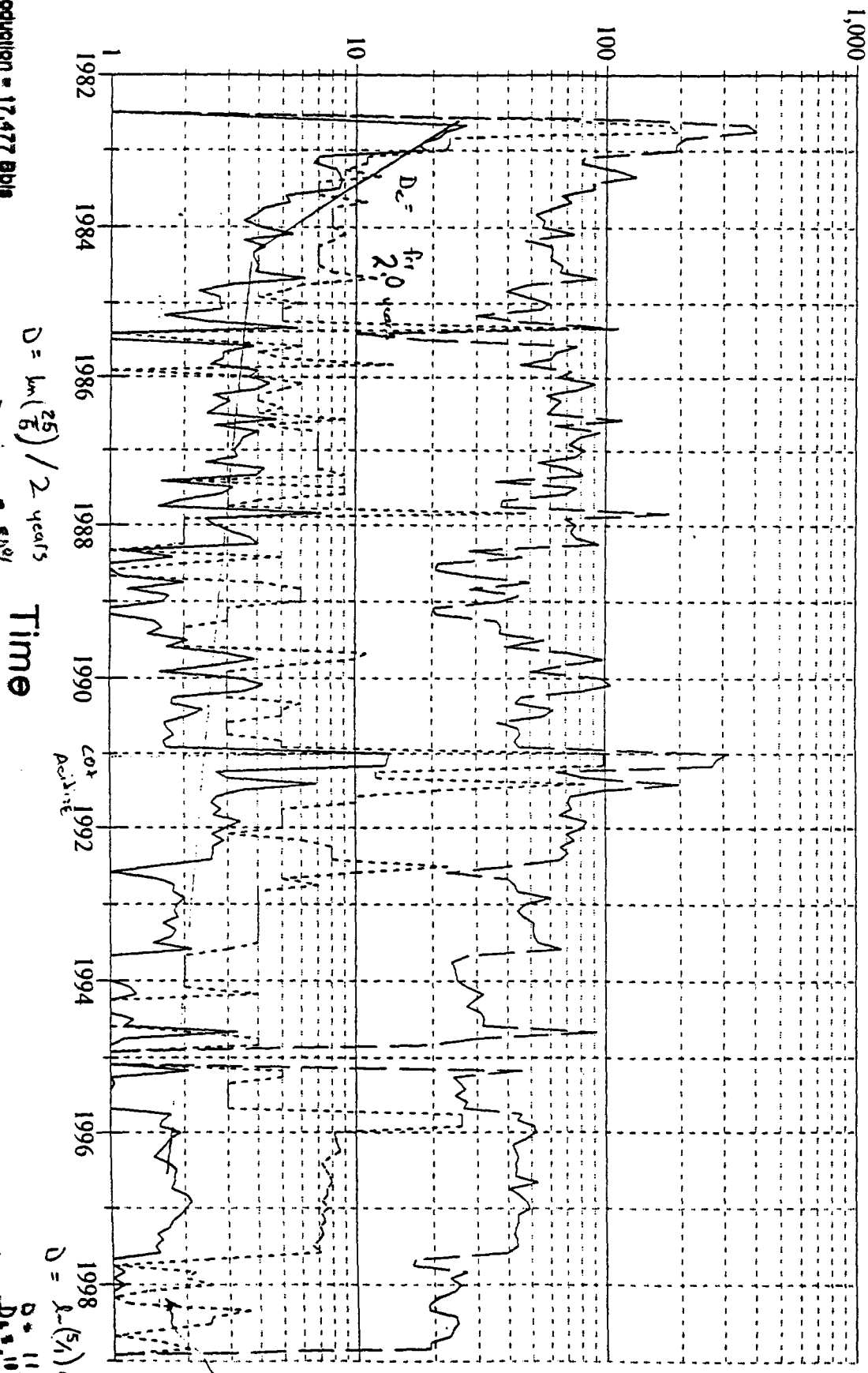


Exhibit 5

Reported Oil Production = 17,477 Bbls
Reported Gas Production = 351,508 Mcf
Reported Water Production = 58,728 Bbls

$D = \ln\left(\frac{25}{6}\right) / 2 \text{ years}$
 $D \cdot 1.0 \text{ year} = 80\%$

Time

$D = \ln\left(\frac{5}{1}\right) / 1.5 \text{ years}$
 $D = 11\% / \text{year}$
Plot Displays Daily Averages

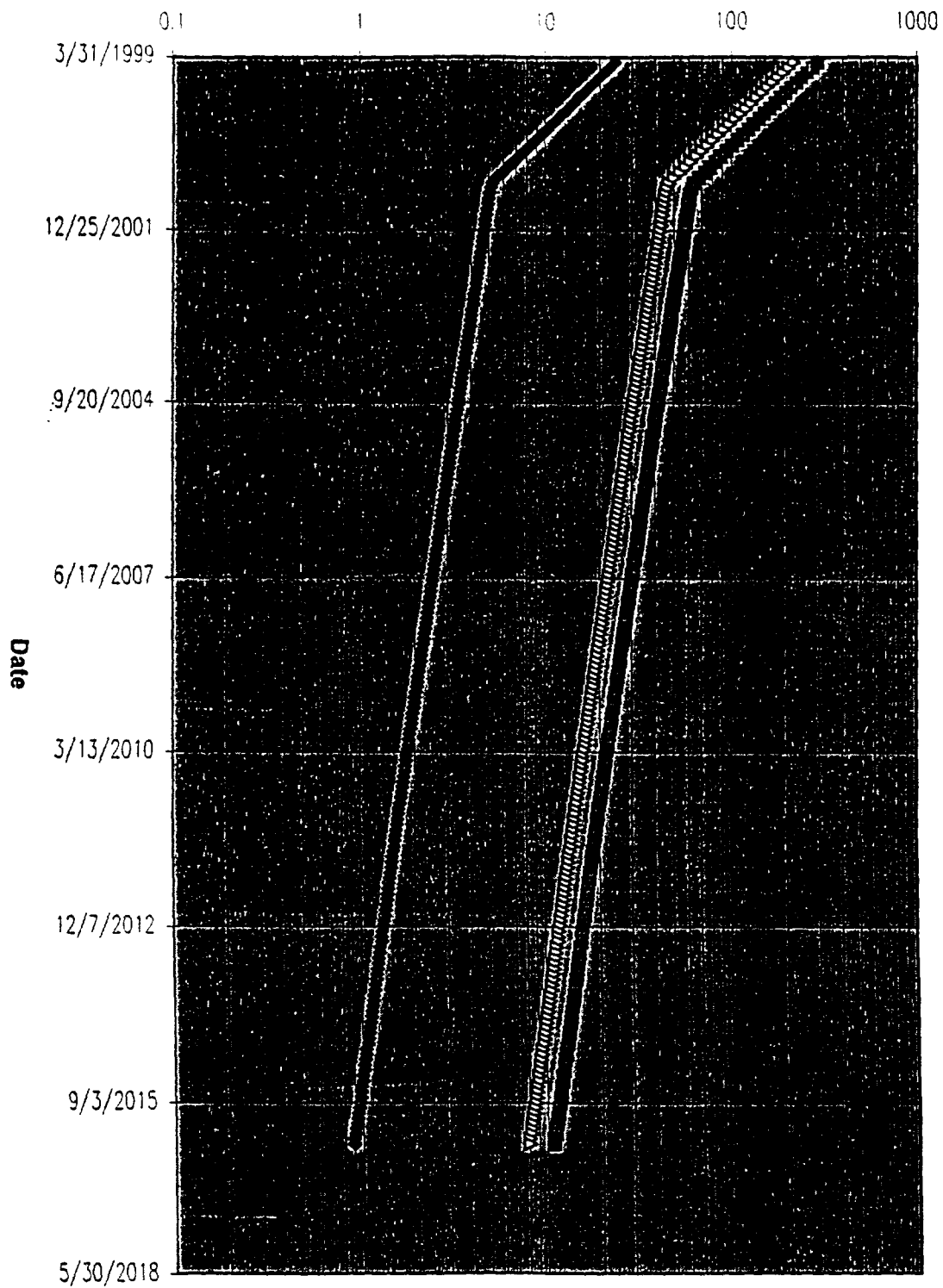
5

San Andres History in EW Walden #12

perfs	3968-76			
	Oil Rate	Water Rate	Gas Rate	
7/8/1982	0	190	11	
7/9/1982	0	192	19	
7/10/1982	0	197	23	
7/11/1982	2	190	25	
7/12/1982	0	190	18	
7/13/1982	NO Test			
7/14/1982	NO Test			
7/15/1982	NO Test			
7/16/1982	27	154	44	
7/17/1982	47	217	NA	
7/18/1982	17	86	NA	
7/19/1982	13	220	NA	
7/20/1982	64	80	NA	
7/21/1982	NO Test		NA	
7/22/1982	25	260	NA	
7/23/1982	34	208	NA	
7/24/1982	22	178	NA	
7/25/1982	19	169	NA	
7/26/1982	17	164	NA	
7/27/1982	15	161	NA	
7/28/1982	14	162	NA	
7/30/1982	Set RBP @ 3960' to test Upper SA			

perfs	3899-3917			
	Oil Rate	Water Rate	Gas Rate	
8/7/1982	5	205	NA	
8/8/1982	5	220	NA	
8/9/1982	9	135	NA	
8/10/1982	10	163	NA	
8/11/1982	NO Test		NA	
8/12/1982	3	141	NA	
8/13/1982	15	141	NA	
8/14/1982	10	50	NA	
8/15/1982	10	50	NA	
8/16/1982	NO Test		NA	
8/17/1982	9	131	NA	
8/18/1982	10	140	NA	

8/18/1982 Set CIBP above San Andres perforations and this well has been Grayburg producer since that time.



◆ Oil Rate, BOPD
■ Gas Rate, MCFPD
△ Water Rate, BWPD