August 9, 1999

Engineering Department
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

AUG | 6 1999

Case 12264

RE: Commingling Order CTB-480

Request for an Alternate Method of Gas Measurement on Oil Wells with Marginal/Low Volume Gas Production, Off Lease Gas Measurement and Surface Gas Commingling for the following Federal leases in the Corbin; Delaware, West Pool:

Corbin 13 A Federal (NM-53239 & NM-94197) Wells #1, #2 & #3, Uncle Sam 13 Federal (NM-0392867) Well #1, and West Corbin 13 Federal (NM-53239), Well #1 Lea County, New Mexico

Gentlemen:

The gas purchaser for the above Federal leases has informed us that they can no longer maintain the existing 5 individual meters, set at each of the above well sites, at the current gas price.

In an endeavor to maintain our current gas contract and price, Maralo, LLC proposes the withdrawal of the purchaser's 5 individual sales meters. There will be one sales meter at the battery and production will be allocated to each well based upon annual GOR well testing. The allocation method is equitable to all parties and will not result in a reduction or loss of royalty. The Federal royalty rate is the same for all leases involved.

The applicant contends that such approval is necessary for further reasonable operation of the Federal leases. Based upon an average gas production of +/- 50 MCF/D for a combined total of the above low volume/marginal wells, this is an effort to extend the life of the wells by maintaining our current gas price and conserving resources that otherwise would be lost.

Enclosed please find the following:

- (1) A schematic diagram describing the proposed operation in detail.
- (2) New Mexico Gas-Oil Ratio Test dated March 2, 1999, detailing the test results from the contributing wells on the last scheduled annual production test.

Page 2

This letter will serve as a statement that all interest owners as well as the Bureau of Land Management have been notified of the proposal.

The New Mexico Oil Conservation Division is requested to amend Commingling Order CTB-480 to reflect the dissimilar gas production handling addressed herein.

Sincerely,

Dorothea Logan Regulatory Analyst

Maralo, LLC

Enclosures: 2

cc: Working Interests (see attached list)

OCD/Hobbs, NM BLM/Roswell, NM

Donather Togan

WORKING INTERESTS Corbin 13 A Federal, West Corbin 13 Federal and Uncle Sam 13 Fed.

Lowe Partners, LP 5151 San Felipe, Suite 400 Houston, Texas 7056-3607

JTI Inc. Suite 603 5801 East 41st Street Tulsa, OK 74135

Enron P. O. Box 2267 Midland, TX 79702 Browning Oil Company Suite 780 LB 41 8080 Central Expressway Dallas, TX75206

Larry A. Mizel Yosemite Creek Oil & Gas LLC 3600 S. Yosemite St., Suite 810 Denver, CO 80237 Fasken Oil & Ranch, LTD 303 West Wall Avenue, Suite 1800 Midland, TX 79701

Revised 1/1/89 Form C-116

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, New Mexico 87504-2088

1000 Rio Brazos Rd., Aztec, NM 87410

P.O. Drawer DD, Artesia, NM 88210

DISTRICT III

P.O. Box 1980, Hobbs, NM 88240

DISTRICT II

Submit 2 copies to Appropriate

District Office.

DISTRICT

GAS - OIL RATIO TEST

Operator						Pool						0	County			
MARALO, LLC						CORBIN; DELAWARE, WEST	ELAK	ARE, MES	- -				LEA			
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WEST CORBIN "13" FEDERAL		٩	13	185	32E		۵.				24	8	34.7	18	10	929
Instructions:		_								Ī	rereby ce	rtify tha	I hereby certify that the above information is true and	ove info	rmation	is true

Instructions:

During gas-oil ratio test, each well shall be produced at a rate not exceeding the top unit allowable for the pool in which well is located by more than 25 percent. Operator is encouraged to take advantage of this 25 percent tolerance in order that well can be assigned increased allowables when authorized by the Division.

Gas volumes must be reported in MCF measured at a pressure base of 15.025 psia and a temperature of 60° F. Specific gravity base will be 0.60.

Report casing pressure in lieu of tubing pressure for any well producing through casing.

(See Rule 301, Rule 1116 & appropriate pool rules.)

complete to the best of my knowledge and belief.

Signature

DOROTHEA LOGAN, REGULATORY ANALYST Printed name and title

MARCH 2, 1999

Date

(915) 684-7441

Telephone No.

