Comment of

## PHILLIPS PETROLEUM COMPANY

BARTLESVILLE, OKLAHOMA

PRODUCTION DEPARTMENT

C. P. DIMIT

VICE PRESIDENT

February 14, 1952

L. E. FITZJARRALD MANAGER

H. H. KAVELER ASSISTANT MANAGER

J. M. HOUCHIN

GENERAL SUPERINTENDENT

GENERAL S

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H. S. KELLY

In re: Application of Phillips Petroleum Company for Permission to Commingle in the Same Tank Battery Oil to be Produced from Phillips Chemical Company's Chem-Santa Fe Wells Nos. 1, 2 and 3, Vacuum Field, Lea County, New Mexico.

New Mexico Oil Conservation Commission Santa Fe, New Mexico

Attention of Mr. R. R. Spurrier, Secretary

Gentlemen:

Phillips Chemical Company has completed its Chem-Santa Fe Wells Nos. 1 and 2 located respectively in Unit 0, SW/4 SE/4 Section 20, Township 17S, Range 35E and Unit K, NE/4 SW/4 Section 20, Township 17S, Range 35E, and is now in process of completing its Chem-Santa Fe Well No. 3 located in Unit D, NW/4 NW/4 Section 29, Township 17S, Range 35E, all of which wells are in the Vacuum Pool of Lea County, New Mexico.

Chem-Santa Fe Wells Nos. 1 and 2 are located on Common School land State Lease B-2388 and Chem-Santa Fe No. 3 Well is located on Common School land State Lease B-1501.

In view of the common ownership of both working interests and mineral interests in these two leases, it is the operator's desire to obtain approval to permit commingling of oil produced from these three wells into the same tank battery located on Common School land State Lease B-2388.

We are in receipt of a letter dated January 23 from Mr. Geo. A. Graham of the State Land Office which states in part as follows:

"Should your company see fit to make application to the Oil Conservation Commission for an exception to Rule 309, the State Land Office would offer no opposition . . . . . . . . "

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New Mexico Oil Conservation Commission Application of Phillips Petroleum Company for Permission to Commingle in the Same Tank Battery Oil to be Produced from Phillips Chemical Company's Chem-Santa Fe Wells Nos. 1, 2, and 3, Vacuum Field, Lea County, New Mexico. February 14, 1952 Page No. 2

Therefore, Phillips Petroleum Company, operator of the subject wells, hereby respectfully makes application for hearing before the Oil Conservation Commission for an exception to Rule 309 to permit the commingling and measurement of oil from the three subject wells in a common tank battery. The granting of such exception will result in the saving of scarce steel and reduced cost of operation and will result in the prevention of waste and the protection of correlative rights.

It will be appreciated if this hearing can be scheduled on March 20, 1952, the date of the March statewide hearing.

Yours very truly,

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CPD