## EXON COMPANY, U.S.A. POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

PRODUCTION DEPARTMENT SOUTHWESTERN DIVISION

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May 16, 1988

Downhole Commingling Simultaneous Dedication N. G. Penrose Well No. 2 Unit H, Section 13, T22S, R37E Lea County, New Mexico

New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, NM 87501

Attention: Mr. David R. Catanach

Exxon Corporation requests an exception to New Mexico Oil Conservation Division Rule 303-A to permit downhole commingling of production from the Blinebry Oil & Gas, Drinkard and Tubb Oil & Gas Pools in the captioned wellbore. Since we expect the Tubb Oil & Gas Pool completion to be gas, we also request simultaneous dedication of a 160 acre gas proration unit in the northeast quarter of Section 13 to N.G. Penrose Wells 1, 2 and 4. Please set this matter for consideration at the June 8, 1988 examiner hearing.

Well No. 2 is currently a marginal multiple completion in the Blinebry and Tubb. The Blinebry was potentialed for 59 mcfpd in 1977. The Tubb last tested 50 mcfgpd. Exxon proposes to pull the current dual production equipment, add the Drinkard and install artificial lift to produce the remaining reserves in all three zones. Since separate testing of the zones before commingling would make the proposal prohibitively expensive, we ask that no such requirement be imposed.

A completed NMOCD Form C-102 for the Tubb is attached, as is the data described in Rule 303 (C)(2). All offset operators have been notified by copy of this letter and its attachments.

Sincerely,

J. D. Howell

JDH:jr Attachments

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Certified Mail - w/attachments
c: Mr. James Bruce
Offset Operators
Mr. Jerry Sexton, NMOCD, Hobbs, NM
2 copies to addressee

Exxon Corporation Exhibit No. 28 Cases 9398 & 9399 June 8, 1988 docket

## OFFSET OPERATORS TO EXXON'S N. G. PENROSE LEASE

Mabee Petroleum Corp. 400 W. Illinois, Ste. 1500 Midland, Texas 79701

Zachary Oil Operating Co. 1212 Commerce Bldg. Fort Worth, Texas 76102

Marathon Oil Company Box 522 125 W. Missouri St. Midland, Texas 79702

Fina Oil & Chemical Company 6 Desta Drive Midland, Texas 79705

Texaco Producing, Inc. Box 3109 500 N. Lorraine Midland, Texas 79701

Sun Exploration & Production Co. Box 1861 Midland, Texas 79702

Sohio Petroleum Company 10 Desta Drive, Ste. 600 West Midland, Texas 79705

J. H. Hendrix Corp. 223 W. Wall 525 Midland Tower Bldg. Midland, Texas 79701

xxon Lse No. tate Lse No	53159		IL CONSERVATION CO			Form C-102 Supersedes C-128 Effective 14-65
ederal Lee. No		- All distances must f	be from the outer boundaries a	f the Section.		
Operator Exxo	n Corporation	<del></del>	N. G. Penr		<b>Y</b>	ell No. 2
Unit Letter	Section 13	Township 22 South	Ronge 37 East	County Lea		
660	Location of Well:	East line o	nd 1,980 fe	et from the	North lin	e
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त्री<del>यामातामाताम् (सम्बद्धाः) स्</del>र 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 belie . Date Surveyed 3-4-75 Registered Profession il Engineer and/or Land Surveyor 1382 330 190 1820 1690 1980 2810 2640 2000 1800 1000 **B**00

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C.E. Sec. File b. A-6858 - A

## Attachment 2 N. G. Penrose Well No. 2 Downhole Commingling - Data Required

To obtain approval for downhole commingling, we have enclosed the following data pursuant to Rule 303 (C) (2) (a through j):

1. Exxon's name and address:

Exxon Corporation P. O. Box 1600 Midland, TX 79702

- 2. Lease name, well number, well location, and name of pools to be commingled:
  - N. G. Penrose Well No. 2, Unit H, Section 13, T-22-S, R37-E, Lea County, New Mexico. Pools to be commingled: Blinebry Oil & Gas, Drinkard, and Tubb Oil & Gas.
- 3. A plat of the area showing the acreage dedicated to the well and the ownership of all offsetting leases:

Attached.

4. A 24-hour productivity test on Division Form C-116 showing the amount of oil, gas, and water produced from each zone:

A test for the Tubb on Form C-116 is attached. The Drinkard has not yet been perforated. Expected Drinkard production is 3.5 BOPD and 68.3 mcfpd. The Blinebry zone is completed in this well but last tested 59 MCFPD on potential test on 9/8/77. This zone has been shut-in sinc: then and has never produced.

5. A production decline curve for zones showing that for a period of at least one year a steady rate of decline has been established for each zone which will permit a reasonable allocation of the commingled production to each zone for statistical purposes:

A decline curve for the Tubb zone is attached. The Blinebry has not produced since 1977 as noted in item 4 above. Allocations shown in Item 9 are based on actual production where available and appropriate or on 1986 average per well production within the immediate area.

6. A current bottom hole pressure for each zone capable of flowing:

Measured shut-in bottomhole pressure is 482 psia for the Tubb, 109? psia for the Blinebry (estimated from static fluid level in the N. G. Fenrose #2) and 1416 psia for the Drinkard (estimated from the static fluid level in the N. G. Penrose #3). When adjusted to a common average dalum of 2771 feet subsea, the Tubb pressure is 482 psia, the Blinebry pressure is 1265 psia and the Drinkard pressure is 1244 psia.

The well currently flows small amounts of gas from the Tubb. The Tubb is not logged up and the Blinebry zone does not appear to be logged up with condensate. However, after commingling with the Drinkard zone the well will probably require artificial lift, which will be installed, in order to produce. Although the lowest pressured zone is less than 50% of the pressure in the highest pressured zone, no crossflow will occur since the fluids will be artificially lifted.

7. A description of the fluid characteristics of each zone showing that the fluids will not be incompatible in the wellbore:

Produced fluids are already surface commingled with no compatibility problems.

8. A computation showing that the value of the commingled production will not be less than the sum of the values of the individual streams:

All of the crude and condensate currently produced from the Blinebry Oil & Gas, Tubb Oil and Gas, Drinkard and Granite Wash pools on this lease is already being surface commingled into one common stock tank, and sold as a mixture. Although unrelated to downhole commingling, increased gas production rates expected from artificial lifting the fluids may disqualify these completions from stripper gas classification.

9. A formula for the allocation of production to each of the commingled zones and a description of the factors or data used in determining such a formula:

The following allocation percentages are suggested based upon the ratio of production from each zone:

	Expected Oil Oil (	Production BOPD)	Expected Gas Gas (MC	
Blinebry Oil & Gas	4.6 3.5	(52%) (39%)	84.9	(41%)
Drinkard Tubb Oil & Gas	0.8	(39%)	68.3 54.8	(33%) (26%)
Commingled Total	8.9	(100%)	208.0	(100%)

10. A statement that all offset operators and, in case of a well on Federal land, the United States Geological Survey, has been notified in writing of the proposed commingling:

By copy of this letter, we are notifying the offset operators of this proposed commingling.

11. In addition, working interest and royalty interest ownership in all zones are the same.

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He'l original and ann copy of this report to the district of the New Mestes Off Conservation Division is exceedance with Puts 301 and appripriate pool rules. Report eveling pressure in New of tuiting pressure for any well producing Results secure.

is true and complete to the best of my knowledge and belief.

I hereby certify that the above information

11-3-87

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