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PRODUCTION DEPARTMENT SOUTHWESTERN DIVISION

G15-686-4105

May 16, 1988 OIL

OIL CONSERVATION DIVISION

Downhole Commingling N. G. Penrose Well No. 3 Unit G, Section 13, T22S, R37E Lea County, New Mexico

( C.J.C. 4399

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

Attention: Mr. David R. Catanach

By your letter dated April 5, 1988 the New Mexico Oil Conservation Division Administrative Order No. DHC-195 was amended to allow the Drinkard, Wantz Granite Wash and Blinebry Oil and Gas Pools to be downhole commingled in the captioned wellbore, conditional upon separately testing of the Gramite Wash before commingling. Due to the marginal economics of the work, Exxon Corporation requests that this condition be removed. Since you indicated that this type of relief would not be granted administratively, please set our request for consideration at the June 8, 1988 examiner hearing.

At the June 8, 1988 hearing, we will present evidence to support the following allocation of production to each zone.

	Expected Oil Production		Expected Gas Production	
	<u>Oil (BOPD)</u>		Gas (MCFPD)	
Blinebry Oil & Gas	4.6	(30%)	84.9	(79%)
Drinkard	7.6	(49%)	13.9	(13%)
<u>Wantz Granite Wash</u>	3.2	<u>(21%)</u>	8.3	(8%)
Commingled Total	15.4	(100%)	107.1	(100%)

All offset operators have been notified by copy of this letter.

Sincerely. J. D. Howell

JDH:dkw

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

## 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

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