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EXON COMPANY, U.S.A.

POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

PRODUCTION DEPARTMENT SOUTHWESTERN DIVISION

May 16, 1988

Downhole Commingling Simultaneous Dedication N. G. Penrose Well No. 1 Unit B, 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. 1 is currently a marginal multiple completion in the Blinebry and Tubb. The Blinebry last tested 8 mcfgpd, but has not produced since 1977. The Tubb last tested 17 mcfgpd and appears to be loading with condensate. 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,

James Soull J. D. Howell

JDH:jr Attachments

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

Exxon Corporation Exhibit No. 2A 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

NEW MEXICO DIL CONSERVATION COMMISSION WEL. LOCATION AND ACREAGE DEDICATIO. PLAT

Form C-102 Supersedes C-128

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Attachment 2 N. G. Penrose Well No. 1 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. 1, Unit B, Section 13, T-22-S, R37-E, Lea County, New Mexico. Pools to be commingled: Blinebry Oil & Gas, Drinkard, and Tubb Oil & Gas.

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:

Tests for the Blinebry and Tubb on Form C-116 are attached. The Drinkard has not yet been perforated. Expected Drinkard production is 3.5 BOPD and 68.3 mcfpd.

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:

Decline curves for the Blinebry and Tubb zones are attached. Note that the Blinebry has not produced since 1977. Test data indicates that this zone is capable of producing 8 mcfpd. 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:

The well currently flows small amounts of gas from the Tubb but appears to be logged up with condensate and most probably will require artificial lift to properly produce. Measured shut-in bottomhole pressure is 487 psia for the Tubb, 488 psia for the Blinebry (estimated from static fluid level in the N. G. Penrose #1) and 1416 psia for the Drinkard (estimated from the static fluid level in the N.G. Penrose #3). When adjusted to a common average datum of 2776 feet subsea, the Blinebry pressure is 668

psia, the Tubb pressure is 474 psia, and the Drinkard pressure is 1246 psia. 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	(52%)	84.9	(41%)
Drinkard	3.5	(39%)	68.3	(33%)
Tubb Oil & Gas	0.8	(9%)	54.8	(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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ENERGY AND AMERICA DEPARTMENT STATE OF NEW MEXICO

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ENERGY AND ARMEDALS DEPARTMENT STATE OF NEW MEXICO

BANTA PE, NEW MEXICO 67001

Form C-116 Oak . GAS-OIL RATIO TESTS TEST PERIOD - AUG. SEPT. OCT.

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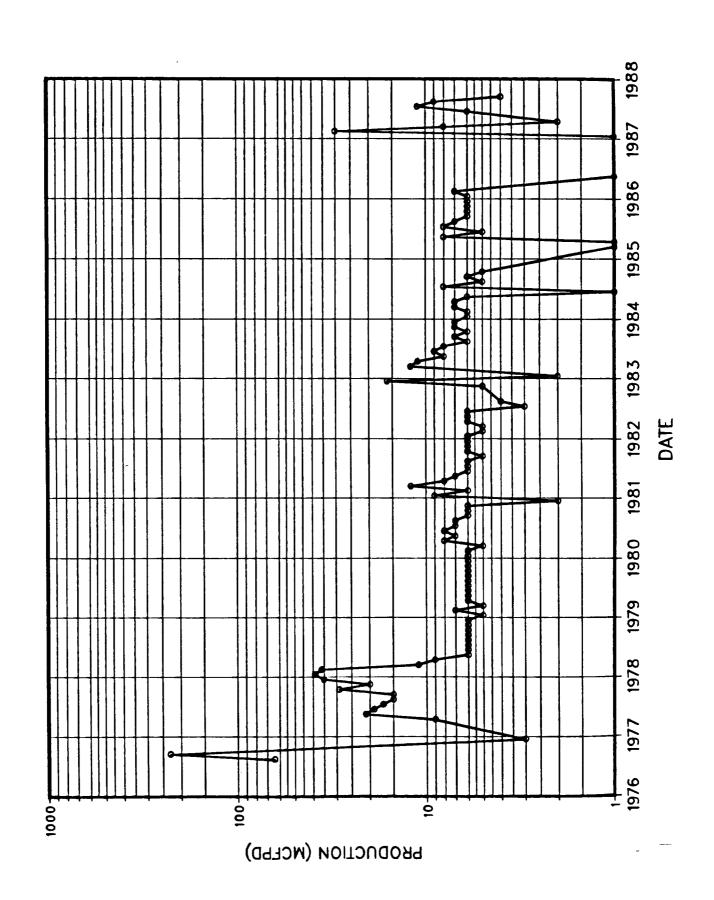
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N G PENROSE #1 TUBB PRODUCTION



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