BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE NO. 5970 Order No. R-5496

APPLICATION OF TEXACO INC. FOR STATUTORY UNITIZATION AND PRESSURE MAINTENANCE, VACUUM-GRAYBURG-SAN ANDRES POOL, LEA COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on June 22, 1977, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this <u>9th</u> day of August, 1977, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS 8

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant, Texaco Inc., seeks the statutory unitization, pursuant to the "Statutory Unitization Act," Sections 65-14-1 through 65-14-21, NMSA, 1953 Compilation, of 3,046.2 acres, more or less, of State and fee lands, being a portion of the Vacuum-Grayburg-San Andres Pool, Lea County, New Mexico, and approval of the plan of unitization and the proposed operating plan.

(3) That the proposed unit area would be designated the Central Vacuum Unit Area; that the vertical limits of said unit area would be the subsurface formation commonly known as the Grayburg-San Andres formation identified between the depths of 3,858 feet (plus 144 feet sub-sea) and 4,858 feet (minus 856 feet sub-sea) on the Welex Acoustic Velocity Log, run on November 15, 1963, in Texaco's State of New Mexico "O" (NCT-1) -2-Case No. 5970 Order No. R-5496

Well No. 23, located in the SW/4 SE/4 of Section 36, Township 17 South, Range 34 East, NMPM, Lea County, New Mexico, and is to include all subsurface points throughout the Unit area correlative to those identified depths, and that the unit area would comprise the following described lands:

> TOWNSHIP 17 SOUTH, RANGE 34 EAST, NMPM Section 25: S/2 and SE/4 NE/4 Section 36: All

> TOWNSHIP 17 SOUTH, RANGE 35 EAST, NMPM Section 30: All Section 31: N/2, SW/4, and SW/4 SE/4

> TOWNSHIP 18 SOUTH, RANGE 34 EAST, NMPM Section 12: N/2 NE/4

> TOWNSHIP 18 SOUTH, RANGE 35 EAST, NMPM Section 6: All Section 7: NW/4 and NW/4 NE/4

(4) That the portion of the Vacuum-Grayburg-San Andres Pool proposed to be included in the aforesaid Central Vacuum Unit Area has been reasonably defined by development.

(5) That the applicant proposes to institute a pressure maintenance project for the secondary recovery of oil and gas in the proposed unit area.

(6) That the unitized management, operation and further development of the subject portion of the Vacuum-Grayburg-San Andres Pool, as proposed, is reasonably necessary in order to effectively carry on secondary recovery operations and to substantially increase the ultimate recovery of oil from the pool.

(7) That the proposed unitized method of operation as applied to the Central Vacuum Unit Area is feasible, will prevent waste, and will result with reasonable probability in the increased recovery of substantially more oil from the pool than would otherwise be recovered.

(8) That the estimated additional costs of such operations will not exceed the estimated value of the additional oil so recovered plus a reasonable profit.

(9) That such unitization and adoption of the proposed unitized method of operation will benefit the working interest owners and royalty owners of the oil and gas rights within the Central Vacuum Unit Area -3-Case No. 5970 Order No. R-5496

(10) That the applicant has made a good faith effort to secure voluntary unitization within the Vacuum Grayburg-San Andres Pool.

(11) That the participation formula contained in the unitization agreement allocates the produced and saved unitized hydrocarbons to the separately owned tracts in the unit area on a fair, reasonable and equitable basis, and protects the correlative rights of all owners of interest within the unit area.

(12) That applicant's Exhibits Nos. 8 and 9 in this case, being the Unit Agreement and the Unit Operating Agreement should be incorporated by reference into this order.

(13) That the Statutory Unitization of the Central Vacuum Unit Area, in conformance to the above findings, will prevent waste and protect correlative rights and should be approved.

IT IS THEREFORE ORDERED:

(1) That the Central Vacuum Unit Agreement, covering 3,046.2 acres, more or less, of State and fee lands in the Vacuum-Grayburg-San Andres Pool, Lea County, New Mexico, is hereby approved for statutory unitization pursuant to the Statutory Unitization Act, Sections 65-14-1 through 65-14-21, NMSA, 1953 Compilation.

(2) That the lands covered by said Central Vacuum Unit Agreement shall be designated the Central Vacuum Unit Area and shall comprise:

> TOWNSHIP 17 SOUTH, RANGE 34 EAST, NMPM Section 25: S/2 and SE/4 NE/4 Section 36: All

> TOWNSHIP 17 SOUTH, RANGE 35 EAST, NMPM Section 30: All Section 31: N/2, SW/4, and SW/4 SE/4

> TOWNSHIP 18 SOUTH, RANGE 34 EAST, NMPM Section 12: N/2 NE/4

> TOWNSHIP 18 SOUTH, RANGE 35 EAST, NMPM Section 6: All Section 7: NW/4 and NW/4 NE/4

-4-Case No. 5970 Order No. R-5496

(3) That the vertical limits of the Central Vacuum Unit Area shall be the Grayburg-San Andres formation identified between the depths of 3,858 feet (plus 144 feet sub-sea) and 4,858 feet (minus 856 feet sub-sea) on the Welex Acoustic Velocity Log, run on November 15, 1963, in Texaco's State of New Mexico "O" (NCT-1) Well No. 23, located in the SW/4 SE/4 of Section 36, Township 17 South, Range 34 East, NMPM, Lea County, New Mexico, and is to include all subsurface points throughout the Unit area correlative to those identified depths.

(4) That applicant's Exhibit No. 8 in this case, being the Central Vacuum Unit Agreement, is hereby incorporated by reference into this order.

(5) That applicant's Exhibit No. 9 in this case, being the Central Vacuum Unit Operating Agreement, is hereby incorporated by reference into this order.

(6) That the Central Vacuum Unit Agreement and the Central Vacuum Unit Operating Agreement provide for unitization and unit operation of the subject portion of the Vacuum-Grayburg-San Andres Pool upon terms and conditions that are fair, reasonable and equitable and include:

an allocation to the separately owned tracts in the unit area of all the oil and gas that is produced from the unit area and is saved, being the production that is not used in the conduct of operations on the unit area or not unavoidably lost;

a provision for the credits and charges to be made in the adjustment among the owners in the unit area for their respective investments in wells, tanks, pumps, machinery, materials and equipment contributed to the unit operations;

a provision governing how the costs of unit operations including capital investments shall be determined and charged to the separately owned tracts and how said costs shall be paid including a provision providing when, how, and by whom the unit production allocated to an owner who does not pay the share of the costs of unit operations charged to such owner, or the interest of such owner, may be sold and the proceeds applied to the payment of such costs; -5-Case No. 5970 Order No. R-5496

> a provision for carrying any working interest owner on a limited, carried or net-profits basis, payable out of production, upon such terms and conditions determined by the Commission to be just and reasonable, and allowing an appropriate charge for interest for such service payable out of such owner's share of production, provided that any nonconsenting working interest owner being so carried shall be deemed to have relinquished to the unit operator all of its operating rights and working interest in and to the unit until his share of the costs, service charge and interest are repaid to the unit operator;

a provision designating the unit operator and providing for the supervision and conduct of the unit operations, including the selection, removal or substitution of an operator from among the working interest owners to conduct the unit operations;

a provision for a voting procedure for the decision of matters to be decided by the working interest owners in respect to which each working interest owner shall have a voting interest equal to its unit participation; and

the time when the unit operation shall commence and the manner in which, and the circumstances under which, the operations shall terminate and for the settlement of accounts upon such termination;

and are therefore hereby adopted.

(7) That this order shall not become effective unless and until the appropriate ratification provisions of Section 65-14-8, NMSA, 1953 Compilation, are complied with.

(8) That if the persons owning the required percentage of interest in the unit area as set out in Section 65-14-8 NMSA, 1953 Compilation, do not approve the plan for unit operations within a period of six months from the date of entry of this order, this order shall cease to be of further force and effect and shall be revoked by the Commission, unless the Commission shall extend the time for ratification for good cause shown. -6-Case No. 5970 Order No. R-5496

(9) That when the persons owning the required percentage of interest in the unit area have approved the plan for unit operations, the interests of all persons in the unit are unitized whether or not such persons have approved the plan of unitization in writing.

(10) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.



STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

PHIL R. LUCERO, Chairman

ARNOLD, Member

JOE D. RAMEY, Member & Secretary

SEAL

BEFORE THE OIL CONSERVATION COMMISSION_ OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE NO. 6008 Order No. R-5530

APPLICATION OF TEXACO INC., FOR A PRESSURE MAINTENANCE PROJECT, LEA COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on August 17, 1977, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this <u>20th</u> day of September, 1977, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That by Commission Order No. R-5496 dated August 9, 1977, statutory unitization was approved for the Central Vacuum Unit Area, Lea County, New Mexico.

(3) That the applicant herein, Texaco Inc., seeks authority to institute a pressure maintenance project on the aforesaid Central Vacuum Unit Area, Vacuum Grayburg-San Andres Pool, Lea County, New Mexico, by the injection of water into the San Andres formation through the 55 wells described on Exhibit A attached to this order.

(4) That to permit an efficient injection pattern, the unorthodox locations of the 54 new injection wells as reflected on said Exhibit A should be approved.

(5) That the applicant further seeks the designation of a project area and the promulgation of special rules and regulations governing said project including special allowable provisions.

-2-Case No. 6008 Order No. R-5530

(7) That the total project area allowable should be equal to the sum of the basic project area allowable plus the water injection credit allowable, and said total project area allowable should be limited to 80 barrels of oil per day times the number of developed 40-acre proration units in the project area times two.

(8) That the basic project area allowable should be equal to 80 barrels of oil per day times the number of developed 40-acre proration units in the project area.

(9) That the water injection credit allowable should be based on the following formula:

Water Injection = <u>net water injected</u> x basic project area Credit Allowable = <u>lasic project area</u> allowable allowable voidage

and should be calculated as follows:

Water Injection
$$\begin{cases} \frac{W_{i} - W_{p}}{BPAA} - 1 \\ \frac{R_{p} - R_{s}}{BPAA} - 1 \\ \end{bmatrix} BPAA \end{cases}$$

β₀ = Oil formation volume factor, reservoir barrels per stock tank barrel, as determined from Exhibit B, for latest available project area reservoir pressure

R = Solution gas-oil ratio, cubic feet per barrel, as determined from Exhibit B, for latest available project area reservoir pressure

βg = Gas formation volume factor, reservoir barrels per MCF, as determined from Exhibit B, for latest available project area reservoir pressure

In no event should the Water Injection Credit Allowable be less than zero.

-3-Case No. 6008 Order No. R-5530

(10) That the project area allowable should be produced from the wells within the project area in any proportion provided that any proration unit situated on the boundary of said Central Vacuum Unit which proration unit is not directly or diagonally offset by a San Andres injection well outside the unit should not be permitted to produce in excess of 80 barrels of oil per day.

(11) That each of the newly drilled injection wells in the project should be equipped with surface casing and production casing set at approximately 350 feet and 4800 feet, respectively, and cemented to the surface.

(12) That injection should be accomplished through 2 3/8inch plastic coated tubing installed in a packer which should be set approximately 50 feet above the uppermost perforation in the case of newly drilled wells and at approximately 4376 feet in the one well to be converted to injection.

(13) That the casing-tubing annulus in each injection well should be filled with an inert fluid and that a pressure gauge or approved leak detection device should be attached to the annulus in order to determine leakage in the casing, tubing, or packer.

(14) That the injection wells or system should be equipped with a pop-off valve or acceptable substitute which will limit the surface injection pressure to no more than 0.2 pounds per foot of depth to the uppermost perforation unless the Secretary-Director of the Commission should administratively authorize a higher pressure.

(15) That there are 15 wells, as set out on Exhibit C to this order, which are located within or immediately adjacent to the boundaries of said Central Vacuum Unit which are completed or plugged in such a manner that will not assure that they will not serve as channels for injected water to migrate from the San Andres formation to other formations or to the surface.

(16) That to prevent migration of injected water from the San Andres formation, formation injection pressure at wells offsetting the wells identified on said Exhibit C should be limited to hydrostatic pressure until such time as the wells on said Exhibit C have been repaired or it shall otherwise be demonstrated to the satisfaction of the Secretary-Director of the Commission that the same will not serve as avenues for escape of such waters. -4-Case No. 6008 Order No. R-5530

(17) That the wells within the project should be equipped to facilitate periodic testing of the annular space between strings of production and surface casing.

(18) That the operator should take all other steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface from injection, producing, or plugged and abandoned wells.

(19) That approval of the subject application should result in the recovery of additional volumes of oil from the Central Vacuum Unit Area, thereby preventing waste.

(20) That the application should be approved.

IT IS THEREFORE ORDERED:

(1) That the applicant, Texaco Inc., is hereby authorized to institute a pressure maintenance project in the Central Vacuum Unit Area, Vacuum-Grayburg-San Andres Pool, Lea County, New Mexico, by the injection of water into 55 wells at orthodox and unorthodox locations as set out on Exhibit A attached to this order and by reference made a part hereof.

(2) That each of the newly drilled injection wells shall be equipped with surface casing and production casing set at approximately 350 feet and 4800 feet, respectively, and cemented to the surface.

(3) That injection shall be accomplished through 2 3/8-inch plastic coated tubing installed in a packer set approximately 50 feet above the uppermost perforation in the case of newly drilled wells and at approximately 4376 feet in the ene existing well converted to injection.

(4) That the casing-tubing annulus in each injection well shall be filled with an inert fluid and a pressure gauge or approved leak detection device shall be attached to the annulus in order to determine leakage in the casing, tubing, or packer.

(5) That the injection wells or system shall be equipped with a pop-off valve or acceptable substitute which will limit the surface injection pressure to no more than 0.2 pounds per foot of depth to the uppermost perforations. -5-Case No. 6008 Order No. R-5530

(6) That the Secretary-Director of the Commission may administratively authorize a pressure limitation in excess of that set out in Order No. (5) above upon a showing by the operator that such higher pressure will not result in fracturing of the confining strata.

(7) That the applicant shall not inject water into the formation of any well located on a 40-acre tract that has on it, or that directly or diagonally offsets a tract that has on it, one of the 15 wells identified on Exhibit C attached hereto and by reference made a part hereof, at a pressure greater than hydrostatic until such well has been repaired or it has been shown to the satisfaction of the Secretary-Director of the Commission that such well will not serve as an avenue of escape for waters injected into the San Andres formation and he has authorized a higher than hydrostatic pressure.

(8) That the wells within the project area shall be equipped with risers or in another acceptable manner such as to facilitate the periodic testing of the bradenhead for pressure or fluid production.

(9) That the operator shall immediately notify the supervisor of the Commission district office at Hobbs of the failure of the tubing or packer in any of said injection wells, the leakage of water or oil from or around any producing well, the leakage of water or oil from or around any plugged and abandoned well within the project area, or any other evidence of fluid migration from the injection zone, and shall take such timely steps as may be necessary or required to correct such failure or leakage.

(10) That the pressure maintenance project shall be designated the Texaco Inc. Central Vacuum Unit Pressure Maintenance Project.

(11) That the project area of said Central Vacuum Unit Pressure Maintenance Project shall consist of those proration units within the boundary of the Central Vacuum Unit upon which is located an injection well and any directly or diagonally offsetting proration unit which contains a producing well.

(12) That those wells within the Central Vacuum Unit Area that are not included within the project area as defined above shall be prorated in accordance with the Rules and Regulations of the Commission. -6-Case No. 6008 Order No. R-5530

(13) That the project area shall receive a project area allowable, and said project area allowable shall be the sum of the basic project area allowable plus the water injection credit allowable, and shall be limited to 80 barrels of oil per day times the number of developed 40-acre project area times two.

(14) That the basic project area allowable shall be equal to 80 barrels of oil per day times the number of developed 40acre proration units in the project area.

(15) That the water injection credit allowable shall be based on the following formula:

Water Injection _ <u>net water injected</u> x basic project area Credit Allowable _ basic project area allowable voidage

and should be calculated as follows:

Water Injection =
$$\begin{cases} \frac{W_{i} - W_{p}}{BPAA} \left[\beta_{0} + \left(\frac{R_{p} - R_{s}}{1000} \right) \beta_{g} \right] & -1 \end{cases} BPAA$$

where:

¢

W_i = Average daily water injection during previous month, barrels per day, project area only

Wp = Average daily water produced during previous month, barrels per day, project area only

BPAA = Basic Project Area Allowable = 80 x number of 40acre tracts in project area

β₀ = Oil formation volume factor, reservoir barrels per stock tank barrel, as determined from Exhibit B (attached hereto and by reference made a part hereof), for the latest available project area reservoir pressure

Rp = Producing gas-oil ratio, cubic feet per barrel, for previous month, project area only

- R_s = Solution gas-oil ratio, cubic feet per barrel, as determined from Exhibit B, for the latest available project area reservoir pressure
- βg = Gas formation volume factor, reservoir barrels per MCF, as determined from Exhibit B, for latest available project area reservoir pressure

In no event shall the Water Injection Credit Allowable be

-7-Case No. 6008 Order No. R-5530

(13) That the average project area reservoir pressure shall be determined prior to the commencement of injection of water into the reservoir and at least annually thereafter. The average project area pressure shall be the average of the pressures in at least ten representative wells selected by the operator of the unit and the Supervisor of the Hobbs District Office of the Commission at an agreed upon datum.

(14) That the project area allowable may be produced from any well within the project area in any proportion provided, however, that any proration unit situated on the boundary of the Central Vacuum Unit which proration unit is not directly or diagonally offset by a San Andres injection well outside said Central Vacuum Unit shall not be permitted to produce in excess of 80 barrels of oil per day.

(15) That each month the project operator shall submit to the Commission a Pressure Maintenance Project Operator's Report, on a form prescribed by the Commission, outlining thereon the data required, and requesting allowables for each of the several wells in the Project as well as the total project area allowable. The aforesaid Pressure Maintenance Project Operator's Report shall be filed in lieu of Form C-120 for the Project.

(16) That the Commission shall, upon review of the report and after any adjustments deemed necessary, calculate the allowable for the wells in the Project for the next succeeding month in accordance with these rules. The sum of the allowables so calculated shall be assigned to the Project and, except as provided under Order (14) above, may be produced from the wells in the Project in any proportion.

(17) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

S CONTRACTOR

STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

PHIL, R. LUCERO, Chairman (1111 EMERY O ARNOLD Member

CENTRAL VACUUM UNIT Authorized Injection Wells

54 new wells to be drilled at the following locations:								
WELL NO.	LOCATION					SECTION	RANGE EAST	
5	1310'	FNL	&	1310'	FWL	30	17	35
6	1310'		&	2630	FWL	30	17	35
7	1310'		S.	1330'	FEL	30	17	35
13	2630		â	10'	FEL	25	17	34
14	2630'	FNL	&	1310'	FWL	30	17	35
15	2630'		£	2630'	FWL	30	17	35
16	2630'		&	1330'	FEL	30	17	35
25	1330'	FSL	&	1310'	FWL	25	17	34
26	1330'	FSL	&	2630'	FWL	25	17	34
27	1330'	FSL	&	1330'	FEL	25	17	34
28	1330'	FSL	&	10'	FEL	25	17	34
29	1330'	FSL	&	1310'	FWL	30	17	35
30	1330'		å	2630'	FWL	30	17	35
31	1330'			1330'	FEL	30	17	35
40	10'		&	1310'	FWL	25	17	34
41	10'	FSL		2630 '	FWL	25	17	34
42	10'		&	1330'	FEL	25	17	34
43	10'		&	10'	FEL	25	17	34
44	10'		&	1310'	FWL	30	17	35
45	10'		&	2630	FWL	30	17	35
46	10'		&	1330	FEL	30	17	35
55	1310'		&	1310'	FWL	36	17	34
56	1310		&	2630	FWL	36	17	34
57	1310'		£	1330'	FEL	36	17	34
58	1310'		æ	10'	FEL	36	17	34
59	1310'		&	1310	FWL	31	17	35
60	1310		æ	2630	FWL	31	17	35
61	1310'		&	1330	FEL	31	17	35
70	2630		&	1310'	FWL	36	17	34
71	2630		&	2630	FWL	36	17	34
72	2630		&	1330'	FEL	36	17	34
73	2630			10	FEL	36	17	34
74	2630			1310	FWL	31	17	35
81	1330'		&	1310	FWL	36	17	34
82	1330'		&	2630	FWL	36	17	34
83	1330		&	1330	FEL	36	17	34
84	1330' 1330'		&	10	FEL	36	17	34
85			&	1310	FWL	31	17 17	35
93 94	10' 10'		& &	1310' 2630'	FWL FWL	31 31	17	35 35
94 99	1310'		α &	1310'	FWL	6	18	35
100	1310'		α &		FWL	6	18	35
100	1310'			1330	FEL	6	18	35
101	2520			1040		6	18	35
E E C C	2320	* 14TI	QE.	T040	T. 11.77	U	10	55

54 new wells	to be	dril	led at	the :	following 1	ocations c	continued
WELL NO.		LOC	ATION		SECTION	TOWNSHIP SOUTH	RANGE EAST
107	2450	FNL	& 2630 ¹	FWL	6	18	35
108	2630'	FNL	& 1480'	FEL	6	18	35
113	1620'	FSL	£ 1100'	FWL	6	18	35
114	1460'		£ 2100 ⁴	FWL	6	18	35
115	1600'	FSL	۵ 1500 a	FEL	6	18	35
120	60'	FNL	£ 1100'	FWL	7	18	35
121	400	FSL	£ 2380 ¹	FWL	6	18	35
122	350	FSL	۱560 ¹	FEL	6	18	35
128	1310'	FNL	§ 200'		12	18	34
129	1310'	FNL	a 2630'		7	18	35
One existing	well,	Sun	Dil Con	npany	Lea State	"B" No. 7	located
as follows:							
131	2119'	FNL	§ 918'	FWL	7	18	35

Case No. 6008 Order No. R-5530 Exhibit "A" - 2 -

OPERATOR	LEASE	WELL NO.	UT.	SEC.	TWP.	RGE.
Continental Oil Co.	State H 35	9	H	35	17S	34E
Getty Oil Company	State AN	8	P	7	185	3 5E
Getty Oil Company	State AN	9	I	7	18S	35E
Getty Oil Company	State BA	6	D	36	17S	34E
Marathon Oil Co.	Warn State A/c 2	6	K	6	185	35E
Marathon Oil Co.	Warn State A/c 2	10	K	6	185	35E
Mobil Oil Corp.	Bridges State	11	F	25	17s	34E
Mobil Oil Corp.	State DD	1	D	31	17S	35E
Phillips Petroleum Co.	Santa Fe	87	L	31	175	35E
Texaco Inc.	New Mexico "AB" State	5	J	6	185	35E
Texaco Inc.	New Mexico "AE" State	4	F	12	185	34E
Texaco Inc.	New Mexico "O" State NCT-1	14	J	36	175	34E
Texaco Inc.	New Mexico "O" State NCT-1	18	H	36	175	34E
Texaco Inc.	New Mexico "P" State	1	J	7	185	35E
Texaco Inc.	New Mexico "Q" State	4	Р	25	175	34E

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Case No. 6008 Order No. R-5530 Exhibit "C"

