ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

July 30, 1992

State 22 Well No. 1 Sec. 22, T-17-S, R-35-E Lea County, New Mexico Commingle Atoka and Morrow Reservoirs South Shoebar Field

New Mexico Department of Energy & Minerals Oil Conservation Division Attention: Jerry Sexton P. O. Box 1980 Hobbs. NM 88240

Dear Mr. Sexton:

Per our conversation with Ms. Evelyn Downs of your office on July 30. 1992. Phillips Petroleum Company is submitting this letter in lieu of an application to downhole commingle the Atoka and Morrow reservoirs in the subject well. Phillips is pursuing this option because the subject well is a marginal producer with limited remaining reserves. The cost to obtain the pressure and production data necessary to complete the application is greater than the value of the remaining reserves. Any additional financial burden against the well will result in Phillips having to plug and abandon the well.

Attached is as much information as we could obtain including a plat, wellbore sketch, production history and completion/workover history. Note that when the Morrow formation was perforated on October 10, 1991, no pressure or production response was noted. It is our sincere belief that the Morrow formation is not contributing to the well's production. All production, past and future; should be allocated to the Atoka formation. If you have any further questions, please contact Keith Maberry of this office at (915) 368-1232.

Larry M. Sanders, Supervisor Regulation and Proration

LMS:KM:sdb

REGPRO: JMAPL: state22

Attachment

cc: RRC - Central Files