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October 15, 1981

Oil Conservation Division
State Land Office Bldg.
Santa Fe, New Mexico 87501
Attn: Mr. Dan Nutter

Request for Rule 107(d) Exception
Re: Sims 35 State, Well No. 1
660' FNL & 1980' FEL, Sec. 35, T20S, R35E
Lea County, New Mexico

Dear Mr. Nutter:

2-7/8" Tubing set at 12,003' with perforations
from 12,963' - 13,192'.

There are several reasons why we feel that completions utilizing a TIW Polish Bore Receptacle is the most advantages method to complete a well.

- (1) The inside diameter of the seal assembly is the same as the diameter of the tubing. Therefore, there is no restriction that would reduce the size of Wireline Tools that could be run in the hole.
- (2) The Polish Bore Receptacle has a full bore opening to the liner below it. This allows us to run bridge plugs, retainers, or bits into the liner if necessary.
- (3) The seal assembly - PBR hook-up allows for tubing movement while treating the well. It will withstand higher treating pressures during stimulation than would be possible with most other production packers.
- (4) In most of the wells drilled in this area there are several zones of interest. By having the seal assembly stung into the PBR, the lowest zone can be tested and if non-productive squeezed. The next zone of interest can then be perforated, acidized and tested. All this can be accomplished without pulling the tubing. This can save a considerable amount of time and money.

The Polish Bore Receptacle is run on the top of the liner. It is for this reason that the tubing is sometimes set a considerable distance above the productive zone.

We feel that this Packer system not only save us a considerable amount of time and money, but also is the most reliable Packer system available. Of the several hundred wells in which HNG Oil Company has utilized this system over the past years, we have had very few failures. If you have any questions please feel free to give me a call.

Very truly yours,

George M. Hauer
George M. Hauer
Completion Engineer