

ARCO Permian 600 N Marienfeld Midland TX 79701 Post Office Bok 1610 Midland TX 79702 Telephone 013 688 1200

January 15, 1998

State of New Mexico Oil Conservation Commission 2040 East Pacheco Santa Fe, New Mexico 87505

Attention: Mr. Ben Stone

Re: J. H. Williams #1 Well (660' FSL, 1980' FEL) J. H. Williams #2 Well (470' FSL, 990' FEL) Township 19 South, Range 34 East Section 34: S/2 SE/4 Lea County, New Mexico

Dear Sirs:

ARCO Permian submitted an application to permit surface commingling of the oil produced from the referenced wells. (Copy of letter dated 12/9/97 enclosed). Our Division Order Title Opinion shows common ownership (royalty and working interest) below the base of the San Andres formation.

Very truly yours,

J.M.

Lee M. Scarborough Land Director, SE New Mexico

LMS/sb

xc: Chris Williams
State of New Mexico
Oil Conservation Commission
P. O. Box 1980
Hobbs, New Mexico 88240

## Kellie Murrish

ARCO Permian P. O. Box 1089 Eunice, New Mexico 88231