Chevron U.S.A. Production Cc ay Carolyn J. Haynie Technical Assistant Eunice Waterflood 15 Smith Road Midland, TX 79705

July 24, 2002

ChevronTexaco

Request for Exception to Rule 303-A Downhole Commingling Monument, Tubb; Monument, Drinkard; & Monument, Abo Baxter Culp 31 # 5 Section 31, T19S, R37E Lea County, New Mexico

State of New Mexico Energy, Minerals & Natural Resources Dept. Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Attention: Ms. Lori Wrotenbery, Director

Dear Ms. Wrotenbery:

ChevronTexaco, Exploration & Production Company, formerly Chevron U.S.A. Production Company, respectfully requests administrative approval for an exception to Rule 303-A to permit Downhole commingling of the Monument, Tubb; Monument, Drinkard; & Monument, Abo zones, in the Baxter Culp 31 # 5.

Currently, the Baxter Culp 31 # 5 is producing in the Monument, Tubb. The Drinkard zone is shut-in and is isolated with a CIBP. ChevronTexaco, is the operator of these wells with a 100% ownership. Commingling will not reduce the actual commercial value of gas or oil sold from the Baxter Culp 31 # 5. Permission to commingle the well would substantially lower operating costs to ChevronTexaco and will extend the economic life of the well.

If you have any questions or need additional information, please contact me at 915-687-7384.

Sincerely,

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Carolyn Haynie New Mexico Waterflood Petroleum Engineering Technical Assistant

Attachments Cc: NMOCD – Hobbs, NM Central Files – Lease & Well Files

