



SUN PRODUCTION COMPANY

December 21, 1978

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

RE: Walter Lynch #2
Sec. 1, T-22-S, R-37-E
Paddock and Wantz
Granite Wash Pools

Gentlemen:

Sun Oil Company respectfully requests permission to multiple complete the Walter Lynch No. 2, Unit L, Lea County, New Mexico, in the Paddock, Drinkard, and Wantz Granite Wash Pools. The well previously has been downhole commingled in the Paddock and Drinkard Pools.

Attached are copies of C-104, a diagrammatic sketch, plat, electrical log and requests for waivers from off-set operators.

Previous authority to multiple complete a well in these pools was granted by the Commission. One example of such authorization is the State "15" #1 & 2 Sec. 16, 21-S, 37-E, Binebry Oil & Gas, Pool & Drinkard Pool, Administrative Order DHC-261.

We wish to downhole commingle the Drinkard and Wantz and surface commingle these two pools with the Paddock. Administrative approval to dual the Paddock and Drinkard was given 9-2-74 (Order No. MC-2142).

It is our belief that this well qualifies for approval under the provisions of Rule 303-C as follows:

1. All zones will be OK.
2. The total of all zones will not exceed limitations.
3. All zones will be artificially lifted.
4. Fluids are compatible, each with the other and no formation damage will occur.
5. Salable value of the combined crude will not be changed.