SUNRAY MID-CONTINENT OIL COMPA

P. O. BOX 2039

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October 24, 1956

Oil Conservation Commission State of New Mexico 125 Mabry Hall Capitol Building Santa Fe, New Mexico

> Re: Exception to Rule 5 of the Special Rules and Regulations for the Tubb Gas Pool, Lea County, New Mexico

Gentlemen:

Sunray Mid-Continent Oil Company respectfully requests that administrative approval be granted for assignment of an 80-acre non-standard gas proration unit to its Eva Owen Well No. 1 in the Tubb Gas Pool, Lea County, New Mexico, as an exception to Rule 5 of the Special Rules and Regulations for the Tubb Gas Pool as established under Order R-586.

Sunray's Eva Owen Well No. 1, located 660 feet from the North and West lines of Section 3, Township 22 South, Range 37 East, Lea County, was completed on August 2, 1946 as a Drinkard oil well with perforations from 6500 to 6554 feet. 12-1/4" surface casing was set at 292 feet with 300 sacks of cement. 9-5/8" casing was set at 1174 feet with 225 sacks of cement. 7" casing was set at 3592 feet with 400 sacks of cement. 5" casing was set at 6599 feet with 250 sacks of cement. The total depth of the well was 6600 feet. It is planned to dually complete this well with the presently completed Drinkard oil zone flowing through the tubing and the Tubb gas zone flowing through the casing-tubing annulus. By separate application, administrative approval of such proposed dual completion is being requested.

An exception to Rule 5 is required since this lease does not include 160 acres. Under Rule 5 (d) the Secretary-Director of the Commission shall have authority to grant an exception to Rule 5 (a) without notice and hearing where application has been filed and where certain facts exist and certain provisions are complied with. In compliance with the requirements of this rule, Sunray alleges and states that the following conditions exist:

