



**Marathon  
Oil Company**

P.O. Box 2409  
Hobbs, New Mexico 88240  
Telephone 505/393-7106

August 26, 1980

Mr. Joe D. Ramey  
Energy and Minerals Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

Re: Application of Marathon Oil Company for Approval of an Unorthodox Well Location in a Standard 160 Acre Tubb Gas Proration Unit for the Lou Worthan No. 9 (Unit E, Sec. 11-22S-37E, 1905' FNL and 440' FWL), Lea County, New Mexico.

Dear Mr. Ramey:

Marathon Oil Company requests your administrative approval for an exception to Rule 103-C to permit production of Tubb Gas from an unorthodox well location in a standard 160 Acre Tubb Gas Proration Unit.

Currently, Well No. 9 is producing Tubb Gas as part of the existing 320 Acre Non-Standard Gas Proration Unit on the Lou Worthan Lease. This 320 Acre Non-Standard Gas Proration Unit was established on November 17, 1954 per Administrative Order No. R-545 and was amended on April 27, 1956 per Administrative Order No. R-796 to include well No. 11. Well No. 11 (Unit F, Section 11-22S-37E, 1905' FNL and 2055' FWL) is a standard well location.

Marathon Oil Company now desires to break the current 320 Acre Non-Standard Gas Proration Unit into two 160 Acre Standard Gas Proration Units (see attached plats). The Northwest quarter of section 11 would constitute one 160 Acre Standard Gas Proration Unit and would include both wells 9 and 11. The Northeast quarter of section 11 would constitute the other 160 Acre Standard Gas Proration Unit and would include Well No. 18 (Unit H, Sec. 11-22S-37E, 1905' FNL and 860' FEL) which is to be put on production soon.

Wells No. 9 and 11 have produced Tubb Gas on this Lease for over 24 years and have produced over 8,000,000 MCF of gas. Because of this long and successful production history, Marathon Oil Company requests your approval for the Non-Standard Location of Well No. 9 so that the Tubb Reserves on this Lease can be continued to be produced by Wells 9 and 11.

All offset operators have been notified by a copy of this application:

Exxon Corporation	P.O. Box 1600	Midland, Texas 79701
Sun Oil Company	P.O. Box 1861	Midland, Texas 79702
Sohio	P.O. Box 3000	Midland, Texas 79702