

Houston D. Jn
Production Operations, United States



**Marathon
Oil Company**

P.O. Box 2409
Hobbs, NM 88241-2409
Telephone 505/393-7106

September 9, 1994

State of New Mexico
Oil Conservation Division
Energy and Mineral Department
Mr. David Catanach
PO Box 2088
Santa Fe, NM 87501

RE: REQUEST FOR EXCEPTION TO RULE 303-A
DOWNHOLE COMMINGLING
EDITH BUTLER "B" WELL NO. 1
UNIT I, 1980' FSL & 660' FEL
SECTION 13, T-22-S, R-37-E
BLINEBRY AND DRINKARD FORMATIONS
DRINKARD FIELD
LEA COUNTY, NEW MEXICO

Dear Mr. Catanach:

Marathon Oil Company respectfully requests administrative approval for an exception to Rule 303-A to permit the downhole commingling of the Tubb and Drinkard formations in the above mentioned well.

Currently, the well is a Tubb-Drinkard dual producer with the Tubb flowing up the casing and the Drinkard on plunger lift below a packer (see attached wellbore sketch). It is proposed that the packer isolating the two zones be removed thus downhole commingling the Tubb and Drinkard. Both zones will be plunger lifted or rod pumped. The Tubb is currently loaded up, being unable to remove liquids up the casing and the Drinkard is being produced inefficiently under a packer. The downhole commingling of the two zones will allow for both zones to be produced to a lower abandonment pressure and recover additional reserves hereby minimizing waste.

Enclosed is the pertinent data supporting this application as outlined in Rule 303-A. If additional information is necessary, please contact Rick Gaddis at (505) 393-7106 ext 201.

Sincerely,

A handwritten signature in dark ink, appearing to read 'T.A. Deines'.

T.A. Deines
Northwest Operations
Production Superintendent

RDG:TAD/94107/kc
Attachments