

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

November 30, 1992

Oil Conservation Division District I Mr. Jerry Sexton P.O. Box 1980 Hobbs, NM 88240

RE: Downhole Commingling
Edith Butler 'B' No. 1
Drinkard Field
Lea County, New Mexico

= 13-12 37

Dear Mr. Sexton:

The Edith Butler 'B' No. 1 failed its packer leakage test on November 7, 1992. Marathon is currently preparing an application to downhole commingle the Tubb and Drinkard/Abo zones. Marathon requests temporary approval to produce the well in a downhole commingled fashion until the application has been submitted and approved.

The upper completion of the well is a Tubb gas zone with the lower zone being a Drinkard/Abo oil completion. The Tubb zone currently flows 7 MCFD with the Drinkard/Abo flowing 3 BOPD, 1 BWPD with 45 MCFD. The proposed method of producing this well is to remove the existing packer and install a plunger lift system. Both zones will be produced up the tubing until the application to commingle has been approved. After approval, the plunger lift system will be installed.

If you have any questions or need additional data, please contact Rick Gaddis at (505)393-7106.

Sincerely,

S.P. Guidry

Northwest Operations

Production Superintendent

SPG:RDG/9235/dw xc: R.A. Biernbaum