## Gulf Of Exploration and Production Company

R. C. Anderson PRODUCTION MANAGER, HOBBS AREA February 8, 1982

P. O. Box 670 Hobbs, NM 88240

Re: Drinkard (NCT-B) #1 Unit P, Section 30-T22S-R38E Lea County, New Mexico

Mr. Joe D. Ramey, Director New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Sir:

Your administrative approval is requested for an exception to Rule No. 303-C2 to permit down-hole commingling of marginal Blinebry and Drinkard production in the subject well. The Drinkard (NCT-B) Lease is currently surface commingled under Order No. PC383. This will be the first well on this lease to have the Blinebry and Drinkard commingled in the wellbore. The Watkins Well No. 2, East of the subject well, has the Blinebry and Drinkard commingled in the wellbore under Order No. DHC-214.

There is no evidence of fluid incompatibility and we do not expect any waste or reservoir damage due to down-hole commingling in the wellbore. Ownership of the two pools is common, and correlative rights will not be violated. Down-hole commingling will allow the recovery of additional hydrocarbons from this well. Currently both zones in the subject well are flowing, however, it may be necessary to equip the well to pump in the foreseeable future.

The Drinkard (NCT-B) #1 Well was drilled and completed in the Drinkard in 1945. The well was dually completed with the Blinebry in 1956 under Order No. MC-2184. Attached are the completion histories, 50 month decline curves, the latest well test for the subject well, and other pertinent data regarding this application as outlined in Rule 303-C2.

Should secondary recovery operations become practical in the future, the two zones could be separated at that time without damaging either reservoir.

Yours very truly,

2.C. audum

JNC/skj Att'd

cc: C. F. Kalteyer-Midland



A DIVISION OF GULF OIL CORPORATION