Gulf Oil Exploration and Production Company

C. D. Borland
PRODUCTION MANAGER, HORBS AREA

June 30, 1978

P. O. Box 670 Hobbs, NM 88240

CERTIFIED-RETURN RECEIPT

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

Dear Sir:

Re: Scarborough Estate No. 8
Unit L, Section 31-22S-38E
Lea County, New Mexico

Your administrative approval is requested for an exception to Rule 303-C to downhole commingle marginal production in the subject dually completed well. The Blinebry and South Brunson Ellenburger production on this lease is currently downhole commingled in the well bore of Well No. 5 under Order No. DHC-43.

There is no evidence of fluid incompatibility and we do not expect any waste or reservoir damage due to downhole commingling in the well bore. Ownership in the two pools is common, and correlative rights will not be violated. The Blinebry zone at present will not flow and downhole commingling will allow the recovery of additional hydrocarbons from this well. For the purpose of this application, expected production has been estimated from the Blinebry decline curve. Both zones will have to be pumped.

The subject well was drilled and dualled in the Blinebry and South Brunson Ellenburger zones in December of 1963. Attached is a complete history and production curves for each pool.

Upon completion of the subject well, Gulf will consult with the Supervisor of the Hobbs District Office of the Energy and Minerals Department to determine an allocation formula based on the subtraction method.

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

Also attached are other pertinent data regarding this application as outlined in Rule 303c-2.

Yours very truly,

Texaco Inc.

P. O. Box 3109

Midland, TX 79701

C. D. BORLAND

Attachments RDW/dch

Little CC:

Energy and Minerals Department P. O. Box 1980 Hobbs, NM 88240

Aztec Oil & Gas Company 1100 Wall Towers West Midland, TX 79701

Gulf

Amoco Production Company P. O. Drawer A Levelland, TX 79336

Cities Service Oil Company P. O. Box 1919 Midland, TX 79701

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