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June 16, 1989

Ms. Evelyn Downs  
Energy & Mineral Department  
Oil Conservation Division  
P. O. Box 1980  
Hobbs, New Mexico 88240

CERTIFIED MAIL

RE: Request For Exception To Rule 303-A  
Downhole Commingling  
Marathon Oil Company  
Lou Worthan No. 20, Unit "F",  
2310' FNL & 2000' FWL, Sec. 11,  
T-22-s, R-37-E  
Wantz Abo  
Wantz Granite Wash  
Lea County, New Mexico

Dear Ms. Downs:

Marathon Oil Company requests administrative approval for an exception to Rule 303-A to permit the downhole commingling of production in the subject well from the Wantz Abo and Wantz Granite Wash Pools in Lea County, New Mexico.

Currently, the well is equipped as a dual producer with the Wantz Abo flowing up the annulus and the Wantz Granite Wash pumping from the tubing string (see attached wellbore skematic). The Wantz Abo is currently shut-in as it has only been flow tested and never put on line commercially due to difficulty in obtaining a gas connection. The Granite Wash has been on pump since original completion of the well in July, 1988.

On April 20, 1989 a packer leakage test was performed on the Lou Worthan No. 20, which failed. Economics of the producing the Wantz Granite Wash dictate two options to correct this situation. First is to commingle the Wantz Granite Wash and the Wantz Abo zones or to set a cast iron bridge plug above the Wantz Granite Wash and temporarily abandon it. To avoid unnecessary loss of production from the Wantz Granite Wash it is requested that Marathon be allowed to commingle the two zones.

WDH/DGP/25/des