

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
811 South First St., Artesia, NM 88210-2835

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410-1693

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505-6429

Form C-107-A
New 3-12-96

APPROVAL PROCESS :
 Administrative Hearing

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE
 YES NO

Burlington Resources Oil & Gas Company

PO Box 4289, Farmington, NM 87499

Operator **SAN JUAN 27-5 UNIT** Address **M-26-27N-05W** County **Rio Arriba**

Lease Well No. **27** Unit Ltr. - Sec - Twp - Rge **27** Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7454 API NO. 30-039-06875 Federal State (and/or) Fee

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Pictured Cliffs - 72359		Blanco Mesaverde - 72319
2. Top and Bottom of Pay Section (Perforations)	3296-3329'		3884-5584'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Gas & Oil - Flowing: Current All Gas Zones: Estimated or Measured	(Current) a. 469 psi		a. 627 psi
	(Original) b. 1198 psi	b.	b. 1336 psi
6. Oil Gravity (°API) or Gas BTU Content	BTU 1149		BTU 1214
7. Producing or Shut-In?	Producing		Producing
Production Marginal? (yes or no)	Yes		yes
* If Shut-In and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data * If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: Rates:	Date: Rates:	Date: Rates:
	Date: 10/98 Rates: 215 MCFD	Date: Rates:	Date: 10/98 Rates: 27 MCFD
8. Fixed Percentage Allocation Formula - % for each zone (total of %'s to equal 100%)	Oil: % Gas: % To Be Supplied Upon Completion	Oil: % Gas: %	Oil: % Gas: % To Be Supplied Upon Completion

RECEIVED
JAN 19 1999
OIL CON. DIV.
DIST. 2

9. If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data.
10. Are all working, overriding, and royalty interests identical in all commingled zones? Yes No
If not, have all working, overriding, and royalty interests been notified by certified mail? Yes No
Have all offset operators been given written notice of the proposed downhole commingling? Yes No
11. Will cross-flow occur? Yes No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. Yes No (If No, attach explanation)
12. Are all produced fluids from all commingled zones compatible with each other? Yes No
13. Will the value of production be decreased by commingling? Yes No (If Yes, attach explanation)
14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. Yes No
15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10694
16. ATTACHMENTS:
* C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
* Production curve for each zone for at least one year. (If not available, attach explanation.)
* For zones with no production history, estimated production rates and supporting data.
* Data to support allocation method or formula.
* Notification list of all offset operators.
* Notification list of working, overriding, and royalty interests for uncommon interest cases.
* Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Jennifer L. Dobson TITLE Production Engineer DATE 01-18-99

TYPE OR PRINT NAME Jennifer L. Dobson TELEPHONE NO. (505) 599-4026

NE MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102
Supersedes C-128
Effective 1-1-65

All distances must be from the outer boundaries of the Section.

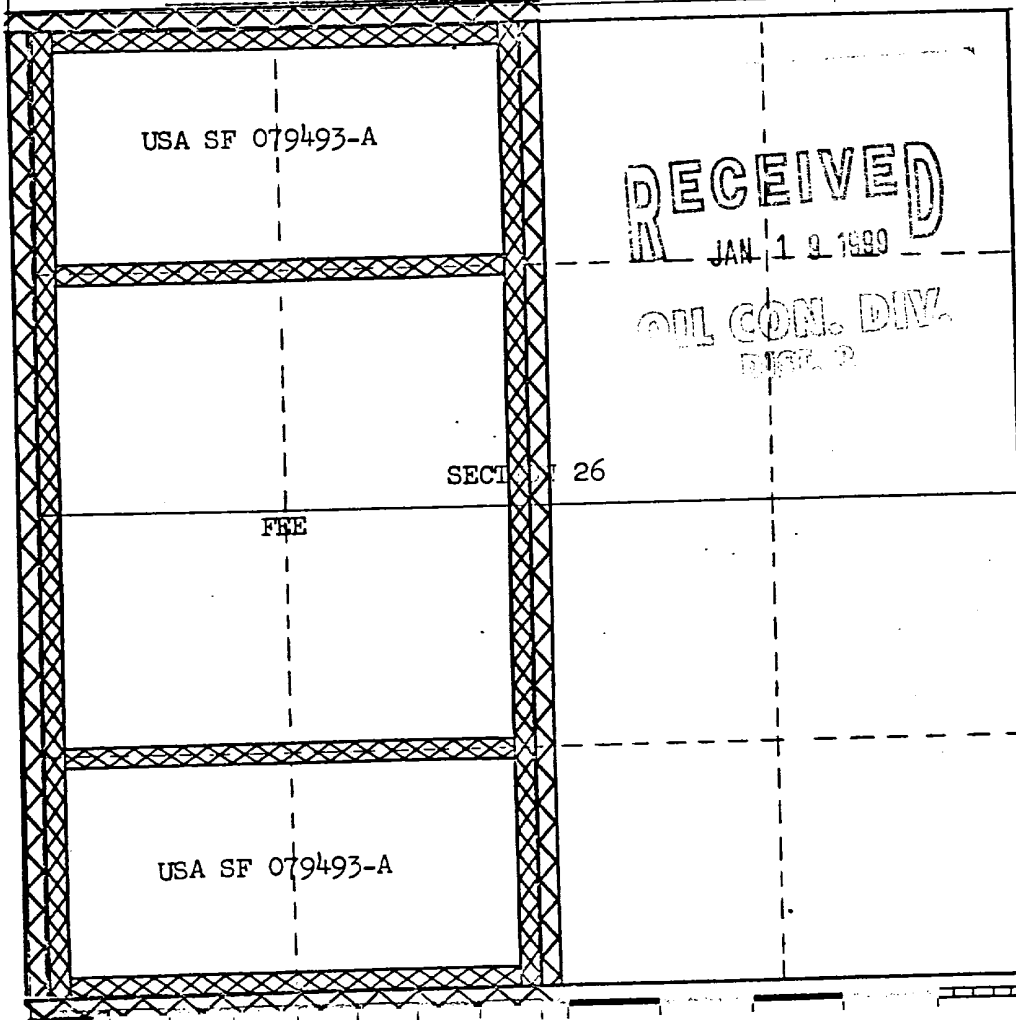
Operator EL PASO NATURAL GAS COMPANY			Lease SAN JUAN 27-5 UNIT (USA SF 079493-A)		FEE	Well No. 27 (PM)
Unit Letter M	Section 26	Township 27-N	Range 5-W	County RIO ARRIBA		
Actual Footage Location of Well: 990 feet from the S line and 890 feet from the W line						
Ground Level Elev. 6548 DF	Producing Formation PC & MV		Pool BLANCO MV & UNDETERMINED PC		Dedicated Acreage: 158.53 - PC 313.41 - MV Acres	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

Yes No If answer is "yes," type of consolidation Unitization

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.)

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. THIS PLAT REISSUED TO SHOW CORRECTED ACREAGE AS PER LETTER N.M.O.C. DATED 2-14-68.



CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Carl Matthews
Name

Petroleum Engineer
Position

El Paso Natural Gas Co.
Company

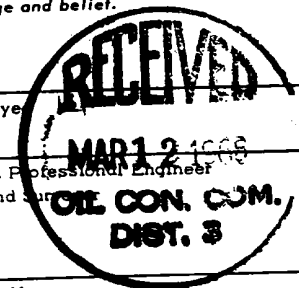
March 11, 1968
Date

Date

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed

Registered Professional Engineer and/or Land Surveyor



Certificate No.

SAN JUAN 27-5 UNIT : 27 : 53357B-1- Pictured Cliffs

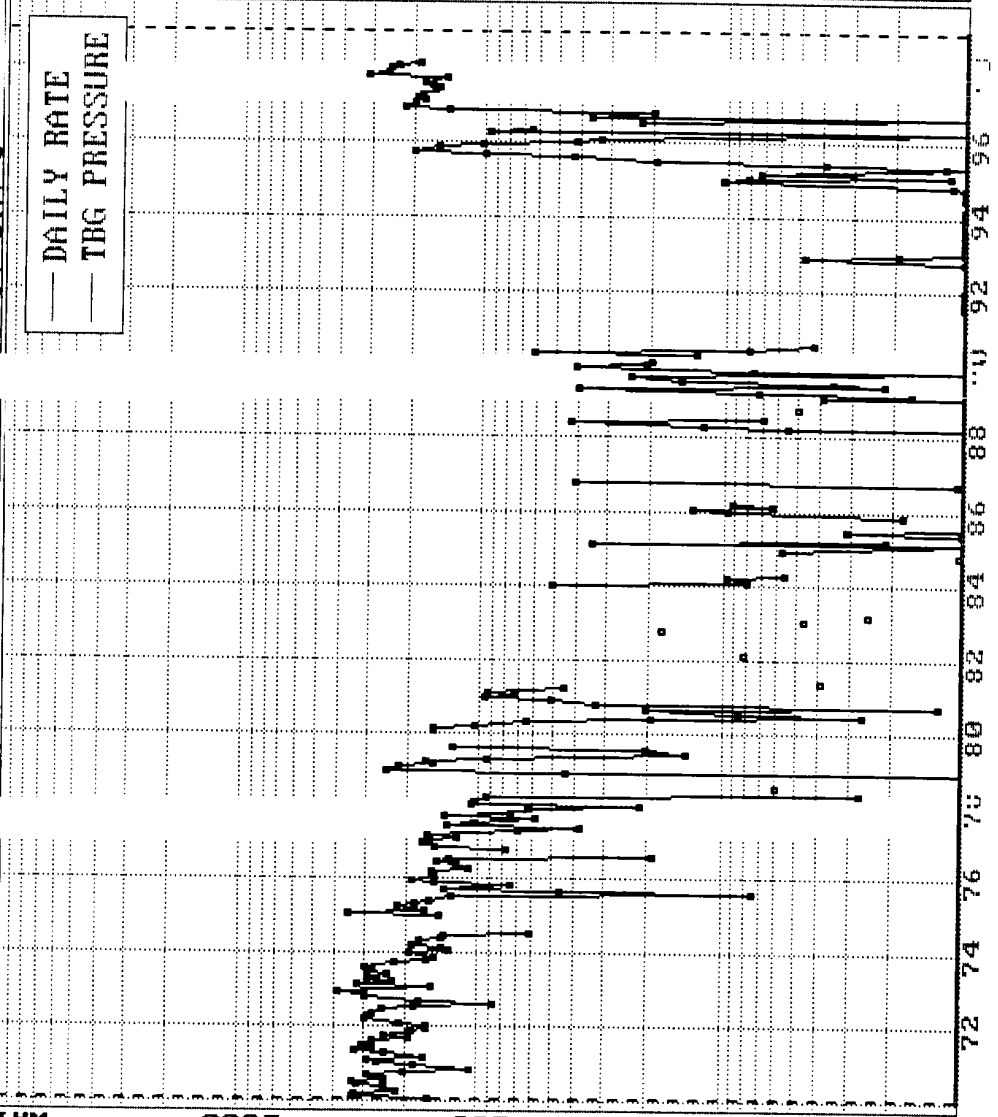
Prop 1424 *

• OIL 100
 • WATER/GAS 1000
 • GAS 1000
 • WATER 1000

— DAILY RATE
 — TBG PRESSURE

○ WATER Bbls/d
 ● GAS Mcf/d
 ○ WATER/GAS
 ○ OIL Bbl/d

 Rate Time
 Semi Log



Major = GAS

FARMINGTON

1998 MONTHLY PRODUCTION FOR 53357B

PHS030

SAN JUAN 27-5 UNIT

27

TAPACITO (PICTURED CLIFFS) FIELD

PICTURED CLIFFS ZONE

MO	T	S	DAYS =====		OIL =====			=====				GAS =====			
			ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER	PROD		
1	2	F					01	7278	31	1136	15.025				
2	2	F					01	5838	28	1136	15.025				
3	2	F					01	6128	31	1136	15.025				
4	2	F					01	5553	25	1136	15.025				
5	2	F					01	5843	29	1136	15.025				
6	2	F					01	5708	30	1149	15.025				
7	2	F					01	5567	31	1149	15.025				
8	2	F					01	5121	31	1149	15.025				
9	2	F					01	5384	30	1149	15.025				
10	2	F					01	6778	31	1149	15.025				
11															
12															

PF6 - RETURNS TO ANNUAL DISPLAY

PF3 - TRANSFER TO UPDATE

PF10 - HELP INFORMATION

PF9 - DISPLAY MONTHLY INJECTI

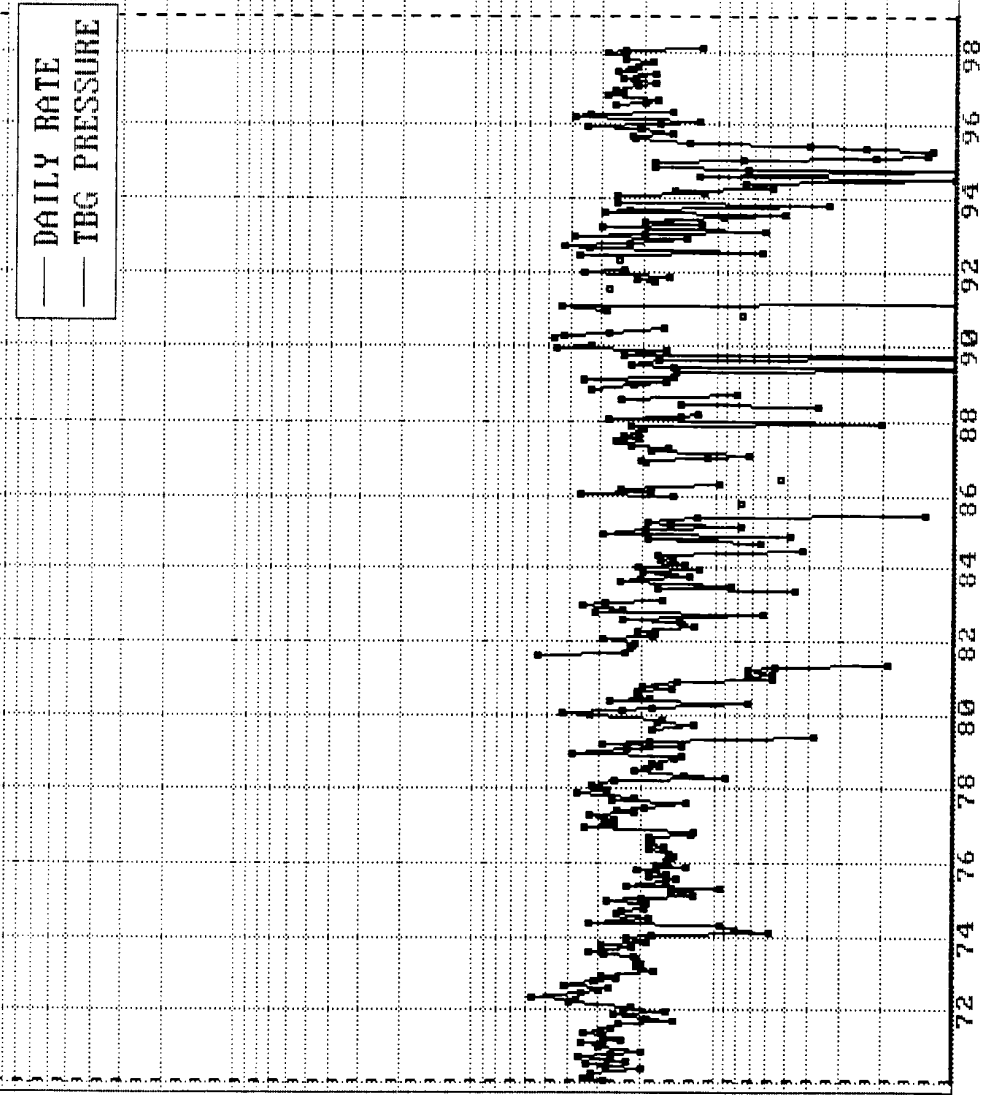
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PRS 12/05/98

• OIL
• WATER/GAS
• GAS
• WATER

SAN JUAN 27-5 UNIT : 27 : 53357A-1 Mesaverde

Prop 1423 *



○ * WATER Bbls/d
● * GAS Mcf/d
○ * WATER/GAS
○ * OIL Bbl/d

RateTime
Semi Log

Major = GAS

FARMINGTON

1998 MONTHLY PRODUCTION FOR 53357A

PHS030

SAN JUAN 27-5 UNIT

27

BLANCO MESAVERDE (PRORATED GAS FIELD

MESAVERDE ZONE

DAYS =====			OIL =====			=====			GAS =====				
MO	T	S	ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER	PROD
1	2	F					01	739	31	1206	15.025		
2	2	F					01	361	28	1206	15.025		
3	2	F					01	504	31	1206	15.025		
4	2	F					01	871	27	1206	15.025		
5	2	F					01	679	29	1206	15.025		
6	2	F					01	468	30	1214	15.025		
7	2	F					01	474	31	1214	15.025		
8	2	F					01	536	31	1214	15.025		
9	2	F					01	440	30	1214	15.025		
10	2	F					01	828	31	1214	15.025		
11													
12													

PF6 - RETURNS TO ANNUAL DISPLAY

PF3 - TRANSFER TO UPDATE

PF10 - HELP INFORMATION

PF9 - DISPLAY MONTHLY INJECTI

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PRS 12/05/98

San Juan 27-5 Unit #27

Bottom Hole Pressures

Flowing and Static BHP

Cullender and Smith Method

Version 1.0 3/13/94

Pictured Cliffs		Mesaverde	
<u>PC - Current</u>		<u>MV-Current</u>	
GAS GRAVITY	0.663	GAS GRAVITY	0.71
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.38	%N2	0.19
%CO2	0.31	%CO2	0.68
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	3313	DEPTH (FT)	4714
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	100	BOTTOMHOLE TEMPERATURE (DEG F)	140
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	432	SURFACE PRESSURE (PSIA)	554
BOTTOMHOLE PRESSURE (PSIA)	469.2	BOTTOMHOLE PRESSURE (PSIA)	627.3
<u>PC - Original</u>		<u>MV-Original</u>	
GAS GRAVITY	0.663	GAS GRAVITY	0.71
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.38	%N2	0.19
%CO2	0.31	%CO2	0.68
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	3313	DEPTH (FT)	4714
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	100	BOTTOMHOLE TEMPERATURE (DEG F)	140
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1091	SURFACE PRESSURE (PSIA)	1163
BOTTOMHOLE PRESSURE (PSIA)	1197.6	BOTTOMHOLE PRESSURE (PSIA)	1336.1

BURLINGTON RESOURCES OIL AND GAS COMPANY

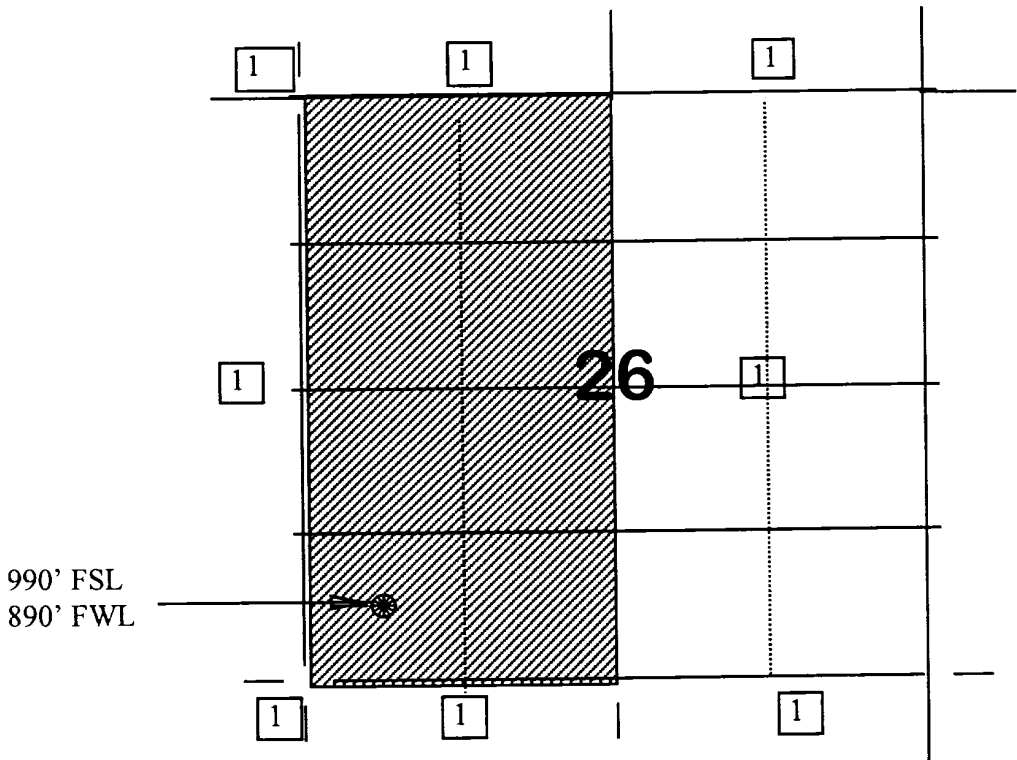
San Juan 27-5 Unit #27

OFFSET OPERATOR/OWNER PLAT

Pictured Cliffs (SW/4) & Mesaverde (W/2) Formations

Commingle well

Township 27 North, Range 5 West



1) Burlington Resources

DATE: January 14, 1989

NAME: SAN JUAN 27-6 Unit #27

FORM: PICTURED CLIFFS

LOCATION

UNIT: M

SEC: 28

TWN: 27N

RNG: 6W

T 27
N

<p>7/73 S.J. 27-5 Unit #165 102/1072 (ee)</p> <p>7/73 S.J. 27-5 Unit #166 37/365 (ee)</p> <p>[22]</p> <p>8/69 S.J. 27-5 Unit #42 38/907 (ee)</p> <p>11/82 S.J. 27-5 Unit #80 89/1030 (ee)</p> <p>8/73 S.J. 27-5 Unit #81 10/78 (ee)</p> <p>[27] P&A 10/73 S.J. 27-5 Unit #182 0/74 (ee)</p> <p>12/80 S.J. 27-5 Unit #56A 21/86 (ee)</p> <p>Shut-in 7/80 S.J. 27-5 Unit #66 0/0 (86)</p>	<p>5/74 S.J. 27-5 Unit #181 15/181 (ee)</p> <p>6/82 S.J. 27-5 Unit #75 28/888 (ee)</p> <p>6/74 S.J. 27-5 Unit #182 24/168 (ee)</p> <p>[23]</p> <p>6/82 S.J. 27-5 Unit #74 28/371 (ee)</p> <p>5/72 S.J. 27-5 Unit #134 18/282 (ee)</p> <p>8/57 S.J. 27-5 Unit #27 193/3204 (ee)</p> <p>8/73 S.J. 27-5 Unit #181 0/237 (ee)</p> <p>[35] 6/74 S.J. 27-5 Unit #159 15/89 (ee)</p>	<p>6/74 S.J. 27-5 Unit #183 22/182 (ee)</p> <p>2/69 S.J. 27-5 Unit #43 31/490 (ee)</p> <p>INA 6/74 S.J. 27-5 Unit #184 0/34 (ee)</p> <p>8/68 S.J. 27-5 Unit #28 220/2877 (ee)</p> <p>6/72 S.J. 27-5 Unit #136 93/449 (ee)</p> <p>INA 7/58 S.J. 27-5 Unit #38 0/608 (ee)</p> <p>[36] 10/58 S.J. 27-5 Unit #18 31/1726 (ee)</p> <p>INA 10/82 S.J. 27-5 Unit #82 0/283 (91)</p>	<p>6/68 S.J. 27-5 Unit #31 13/188 (ee)</p> <p>[24] S.J. 27-5 Unit #167 0/188 (ee)</p> <p>INA 10/73 S.J. 27-5 Unit #157 0/188 (ee)</p> <p>6/74 S.J. 27-5 Unit #158 20/252 (ee)</p>
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LEGEND
 COMPLETION DATE
 WELL NAME
 MCFD-CUM(MMWF)
 BOP/D-CUM(MBOI)

DATE: January 1, 1999

NAME: SAN JUAN 27-5 Unit #27

FORM: MESAVER DE

LOCATION

UNIT: M

SEC: 28

TWN: 27N

RNG: 5W

T
27
N

<p>11/54 S.J. 27-5 Unit #9 29/284 (ee) [22]</p> <p>6/59 27-5 Unit #42 75/652 (ee)</p> <p>4/97 .J. 27-5 Unit #117 187/124 (ee)</p> <p>11/56 S.J. 27-5 Unit #18 35/580 (ee)</p>	<p>7/61 S.J. 27-5 Unit #10 55/691 (ee)</p> <p>[23]</p> <p>11/85 S.J. 27-5 Unit #33 32/493 (ee) [28]</p> <p>8/57 S.J. 27-5 Unit #27 19/352 (ee)</p>	<p>5/58 S.J. 27-5 Unit #31 78/1415 (ee)</p> <p>[24]</p> <p>2/59 S.J. 27-5 Unit #43 270/521 (ee)</p>
<p>11/55 S.J. 27-5 Unit #11 41/772 (ee) [27]</p> <p>8/61 27-5 Unit #68 57/676 (ee)</p>	<p>11/85 S.J. 27-5 Unit #33 32/493 (ee) [28]</p> <p>8/58 S.J. 27-5 Unit #28 32/620 (ee)</p>	<p>8/58 S.J. 27-5 Unit #32 52/647 (ee) [25]</p>
<p>11/53 27-5 Unit #56A 92/618 (ee) 34] 3/81 27-5 Unit #5A 81/561 (ee)</p> <p>12/55 S.J. 27-5 Unit #12 31/838 (ee) [35]</p>	<p>5/57 S.J. 27-5 Unit #20 34/366 (ee)</p> <p>6/96 S.J. 27-5 Unit #148 87/102 (ee)</p>	<p>7/58 S.J. 27-5 Unit #36 28/524 (ee) [38] INA 10/66 S.J. 27-5 Unit #18 0272 (ee)</p>

R-5-W

LEGEND

COMPLETION DATE

WELL NAME

MCF/D-CUM(MMF)

BOP/D-CUM(MBO)

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 11626
ORDER NO. R-10694

**APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 27-5 UNIT PURSUANT
TO DIVISION RULE 303.E AND THE ADOPTION
OF SPECIAL ADMINISTRATIVE RULES THEREFOR.
SAN JUAN COUNTY, NEW MEXICO.**

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on October 17 and November 7, 1996 at Santa Fe, New Mexico, before Examiners David R. Catanach and Michael E. Stogner respectively.

NOW, on this 12th day of November, 1996, the Division Director, having considered the testimony, the record and the recommendations of the Examiner, and being fully advised in the premises.

FINDS THAT:

(1) Due public notice having been given as required by law, the Division has jurisdiction of this cause and the subject matter thereof.

(2) The applicant, Burlington Resources Oil & Gas Company (Burlington), pursuant to the provisions of Division Rule 303.E., seeks to establish a downhole commingling "reference case" to provide exceptions for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County, New Mexico.

(3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

"If sufficient data exists on a lease, pool, formation, geographic area, etc., so as to render it unnecessary to repeatedly provide such data on Form C-107-A, an operator may except any of the various criteria required under Paragraph 303.D. of this rule by establishing a "reference case". The Division, upon its own motion, or by application from an operator, may establish "reference cases" either administratively or by hearing. Upon Division approval of such "reference cases" for specific criteria, subsequent applications to downhole commingle (Form C-107-A) will be required only to cite the Division order number which established such exceptions and shall not be required to submit data for those criteria."

(4) The applicant is the current operator of the San Juan 27-5 Unit which encompasses some 23,043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 27-5 Unit, the applicant currently operates one hundred and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and four (4) Basin-Fruitland Coal Gas Pool wells.

(6) According to its evidence and testimony, Burlington seeks to:

- a) establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations whereby these formations and/or pools may be identified as "marginal" on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit. The applicant further proposes that the data provided in the immediate case serve as supplemental data or confirmation that these formations and/or pools should be classified as "marginal";
- b) establish a "reference case" for pressure criteria in the Dakota and Pictured Cliffs formations whereby the Division may utilize data provided in the immediate case to verify the pressure data provided on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit;

- c) establish a "reference case" whereby the Division utilizes the data presented in the immediate case to endorse or approve certain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a certain method of allocating production on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit; and.
- d) establish a "reference case" or an administrative procedure for authorizing the downhole commingling of existing or future drilled wells within the San Juan 27-5 Unit without additional notice to each affected interest owner as required by Division Rule No. 303.D.

(7) In support of its request to except marginal economic criteria, the applicant presented geologic and engineering evidence and testimony which indicates that within the San Juan 27-5 Unit:

- a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent;
- b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 583 MMCFG and 426 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 MCFGD, respectively; and.
- d) the estimated ultimate gas recoveries and initial producing rates from the Dakota and Pictured Cliffs formations are insufficient to justify drilling stand alone wells and/or dually completed wells to recover such gas reserves.

(8) The evidence and testimony presented by the applicant indicates that Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit should be properly classified as "marginal".

(9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- a) the average shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations at the time of initial development were approximately 3.141 psi and 1.118 psi, respectively; and.
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1.032 psi and 441 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 27-5 Unit so as to except pressure criteria as proposed by the applicant.

(11) The applicant testified that various allocation methods will be utilized for downhole commingled wells within the San Juan 27-5 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:

- a) the subtraction method will likely be utilized in those instances involving the Basin-Fruitland Coal Gas Pool and in those instances where a zone with a well established decline rate is commingled with a newly completed zone;
- b) a fixed allocation formula will be utilized in those instances where production history for both zones is available, or in those instances where newly completed zones are tested and stabilized flow rates obtained.

(12) The allocation methods proposed by the applicant are routinely utilized in the industry and approved by the Division and therefore the proposal to except allocation formulas should be approved.

(13) In support of its request to establish a "reference case" or administrative procedure for providing notice within the San Juan 27-5 Unit the applicant presented evidence and testimony which indicates that:

- a) the interest ownership between two zones within a given wellbore in the San Juan 27-5 Unit is generally not common;
- b) pursuant to Division Rule No. 303.D., applicant is currently required to notify all interest owners within the San Juan 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit;

- c) providing notice to each interest owner within the San Juan 27-5 Unit of subsequent downhole comminglings is unnecessary and is an excessive burden on the applicant;
- d) the downhole commingling of wells within the San Juan 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 27-5 Unit should not violate the correlative rights of any interest owner;
- e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for notice.

(14) An administrative procedure should be established within the San Juan 27-5 Unit for obtaining approval for subsequent downhole commingled wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are complied with.

(15) Approval of the proposed "reference cases" for marginal economic criteria, pressure criteria, allocation formulas and notice will lessen the burden on the applicant insofar as providing the data required pursuant to Division Rule No. 303.D. and Form 107-A. will provide the applicant a streamlined method for obtaining downhole commingling approvals within the San Juan 27-5 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Burlington Resources Oil & Gas Company to establish a "reference case" for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Picured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County, New Mexico, is hereby approved.

(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify the Pictured Cliffs and Dakota pressure information provided, and support or justification for utilizing a given method or formula for allocation of production, provided however, in the event any of the data described above appearing on Form C-107-A appears to be beyond the data range provided in this case, the Division may require the submittal of additional supporting data.

(3) In order to obtain Division authorization to downhole commingle well within the San Juan 27-5 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Aztec Offices of the Division. Such application shall contain all the information required under Rule No. 303.C. of the Division Rules and Regulations, provided however that the applicant shall not be required to provide notice to all interest owners within the San Juan 27-5 Unit of such proposed commingling.

(4) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY
Director

S E A L