

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 :
X Administrative ___Hearing

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE
X YES ___NO

Burlington Resources Oil & Gas Company PO Box 4289, Farmington, NM 87499

Operator	Address		
SAN JUAN 27-5 UNIT	51	K-28-27N-05W	Rio Arriba
Lease	Well No.	Unit Ltr. - Sec - Twp - Rge	County
Spacing Unit Lease Types: (check 1 or more)			
OGRID NO. 14538	Property Code 7454	API NO. 30-039-06888	Federal _X_, 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)	3192-3260'		3760-5474'
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	a. (Current) 463 psi b. (Original) 1124 psi		a. 619 psi b. 1250 psi
6. Oil Gravity (°API) or Gas BTU Content	BTU 1180		BTU 1233
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	Date: Rates:	Date: Rates:	Date: Rates:
* If Producing, give data and oil/gas/water of recent test (within 60 days)	Date: 10/98 Rates: 20 MCFD	Date: Rates:	Date: 10/98 Rates: 60 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

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 ___x___ No ___
If not, have all working, overriding, and royalty interests been notified by certified mail? Yes ___x___ No ___
Have all offset operators been given written notice of the proposed downhole commingling? Yes ___x___ No ___
11. Will cross-flow occur? ___x___ 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. ___x___ Yes ___ No (If No, attach explanation)
12. Are all produced fluids from all commingled zones compatible with each other? ___x___ Yes ___ No
13. Will the value of production be decreased by commingling? ___ Yes ___x___ 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. ___x___ 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

Well Location and Acreage Designation Plat

Section A.

Date **FEBRUARY 10, 1960**

Operator **EL PASO NATURAL GAS COMPANY** Lease **SAN JUAN 27-5 UNIT** SF **079394**
 Well No. **51 (PM)** Unit Letter **K** Section **28** Township **27-N** Range **5-W** NMPM
 Located **1660** Feet From **SOUTH** Line **1600** Feet From **WEST** Line
 County **RIO ARriba** G. L. Elevation **6457** Dedicated Acreage **160 & 320** Acres
 Name of Producing Formation **PICTURED CLIFFS & MESA VERDE** Pool **SO. BLANCO P.C. EXT. & BLANCO M.V.**

1. Is the Operator the only owner in the dedicated acreage outlined on the plat below?
 Yes _____ No **X** _____
2. If the answer to question one is "no", have the interests of all the owners been consolidated by communization agreement or otherwise? Yes **X** _____ No _____ . If answer is "yes", Type of Consolidation, **Unit Agreement**
3. If the answer to question two is "no", list all the owners and their respective interests below:

Owner

Land Description

Section B.

This is to certify that the information in Section A above is true and complete to the best of my knowledge and belief.

El Paso Natural Gas Company

(Operator)

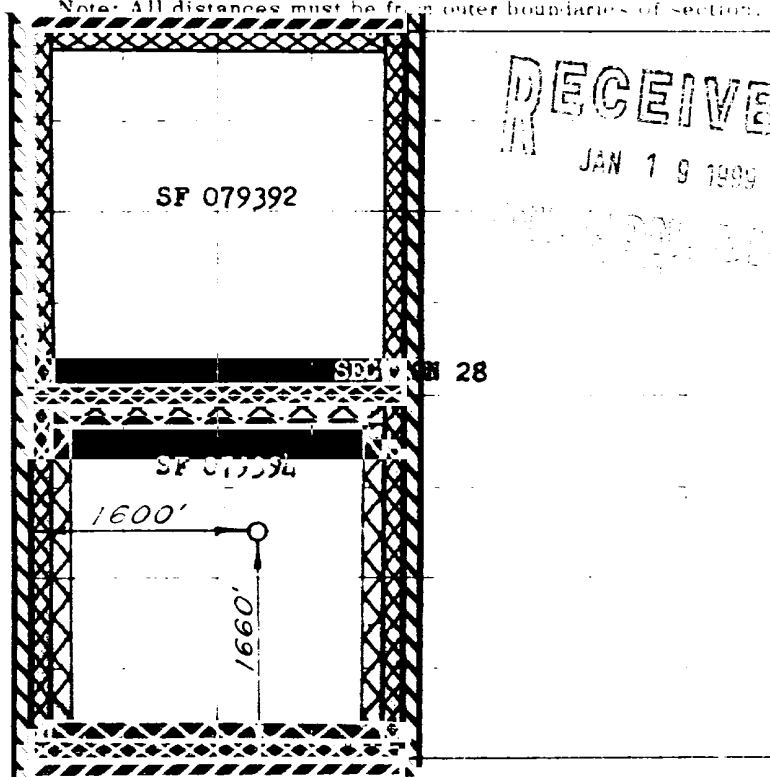
H. E. McAnally
 (Representative)

Box 990

(Address)

Farmington, New Mexico

Note: All distances must be from outer boundaries of section.



NOTE: THIS PLAT IS RE-ISSUED TO SHOW CORRECTED LEASE INFORMATION. 5/25/60

Scale 4 inches equal 1 mile

This is to certify that the above plat was prepared from field notes of actual surveys made by me or under my supervision and that the same are true and correct to the best of my knowledge and belief.

(Seal)

Date surveyed

FEBRUARY 4, 1960

David A. Kilmer

Farmington, New Mexico

SAN JUAN 27-5 UNIT : 51 : 53382B-1 Pictured Cliffs

• OIL
+ WATER/GAS
• GAS
* WATER

— DAILY RATE
— TBG PRESSURE

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

RateTime
Semi Log

100
1000
1000
1000

10
100
100
100

1
10
10
10

0.1
1
1
1

Major = GAS

• OIL
• WATER/GAS
• GAS
• WATER

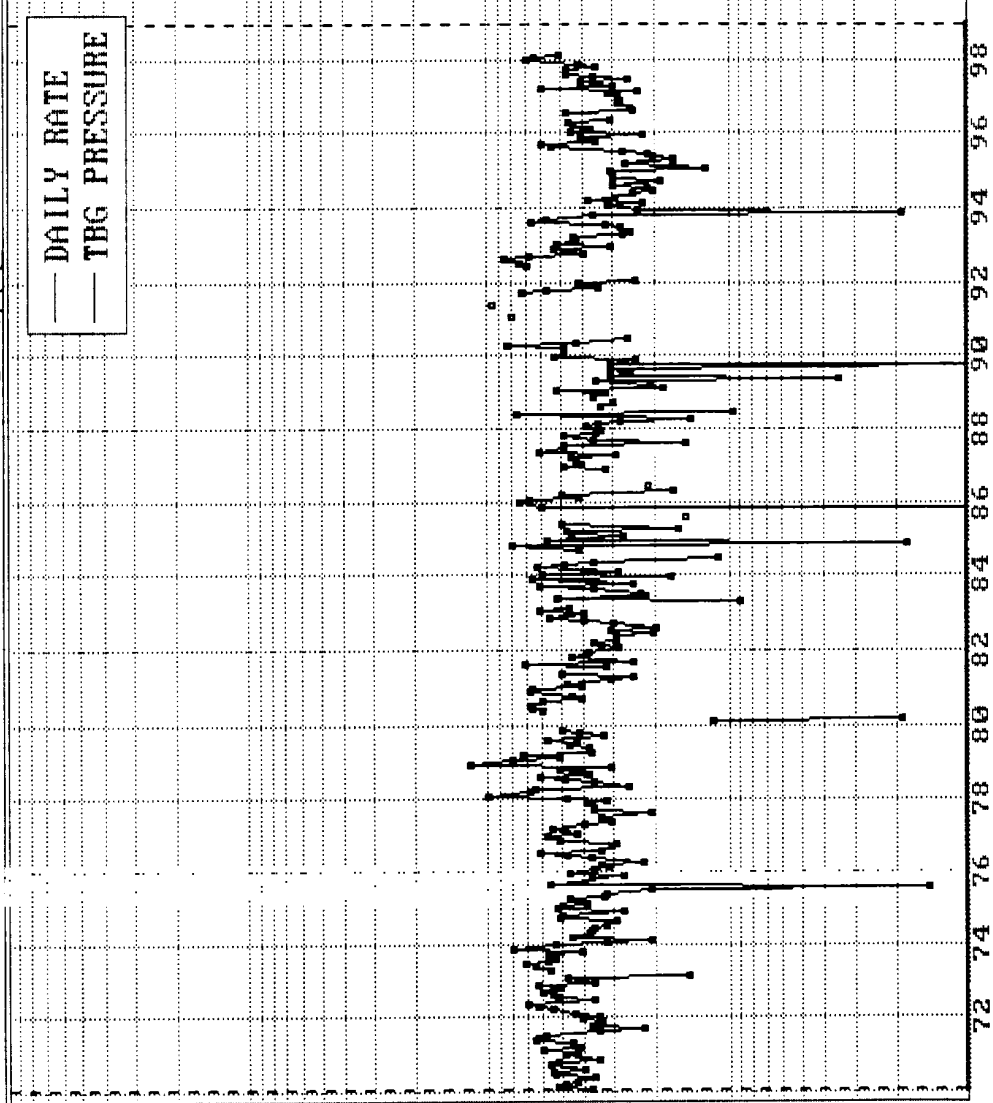
SAN JUAN 27-5 UNIT : 51 : 53382A-1 Mesavende

Prop 1461 *

- • WATER Bbls/d
- • GAS Mcf/d
- • WATER/GAS
- • OIL Bbl/d

RateTime
Semi Log

— DAILY RATE
— TBG PRESSURE



Major = GAS

FARMINGTON	1998 MONTHLY PRODUCTION FOR 53382A	PHS0301
SAN JUAN 27-5 UNIT	51	
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	1941	31	1250	15.025		
2	2	F					01	1559	28	1250	15.025		
3	2	F					01	1475	31	1250	15.025		
4	2	F					01	1615	30	1250	15.025		
5	2	F					01	1149	28	1250	15.025		
6	2	F					01	1765	30	1250	15.025		
7	2	F					01	1078	25	1233	15.025		
8	2	F					01	1308	31	1233	15.025		
9	2	F					01	1299	30	1233	15.025		
10	2	F					01	1855	31	1233	15.025		
11													
12													

PF6 - RETURNS TO ANNUAL DISPLAY	PF3 - TRANSFER TO UPDATE
PF10 - HELP INFORMATION	PF9 - DISPLAY MONTHLY INJECTI
00/00/00 00:00:00:0	PRS 12/05/98

FARMINGTON

1998 MONTHLY PRODUCTION FOR 53382B

PHS0301

SAN JUAN 27-5 UNIT

51

BLANCO P.C. SOUTH (GAS) FIELD

PICTURED CLIFFS ZONE

DAYS =====			OIL =====		=====		GAS =====						
MO	T	S	ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER	PROD
1	2	F					01	840	31	1171	15.025		
2	2	F					01	564	28	1171	15.025		
3	2	F					01	767	31	1171	15.025		
4	2	F					01	636	30	1171	15.025		
5	2	F					01	577	28	1171	15.025		
6	2	F					01	784	30	1171	15.025		
7	2	F					01	611	25	1180	15.025		
8	2	F					01	600	31	1180	15.025		
9	2	F					01	568	30	1180	15.025		
10	2	F					01	617	31	1180	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 #51
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	0.683	GAS GRAVITY	0.723
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.4	%N2	0.22
%CO2	0.22	%CO2	0.76
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	3226	DEPTH (FT)	4617
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)	426	SURFACE PRESSURE (PSIA)	547
BOTTOMHOLE PRESSURE (PSIA)	462.9	BOTTOMHOLE PRESSURE (PSIA)	619.3
<u>PC - Original</u>		<u>MV-Original</u>	
GAS GRAVITY	0.683	GAS GRAVITY	0.723
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.4	%N2	0.22
%CO2	0.22	%CO2	0.76
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	3226	DEPTH (FT)	4617
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)	1024	SURFACE PRESSURE (PSIA)	1089
BOTTOMHOLE PRESSURE (PSIA)	1124.3	BOTTOMHOLE PRESSURE (PSIA)	1249.6

Page No.: 2

Print Time: Tue Dec 22 09:11:01 1998

Property ID: 1462

Property Name: SAN JUAN 27-5 UNIT | 51 | 53382B-1 Pictured Cliffs

Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE-- ---CUM GAS-- M SIWHP

-----Mcft-----Psi-----

04/11/60	0	1024.0 - Initial Pressure
05/05/60	0	1011.0
10/14/60	6000	761.0
05/28/61	14000	722.0
07/13/62	28000	726.0
07/16/63	36000	697.0
10/22/64	46000	706.0
05/10/65	48000	699.0
04/19/66	58000	625.0
08/04/67	68000	591.0
05/02/68	74000	595.0
08/28/70	93064	522.0
04/08/71	98665	497.0
07/25/72	110371	472.0
05/09/73	117355	451.0
02/22/84	203743	402.0
06/21/84	205473	393.0
11/06/85	210129	435.0
10/11/88	219963	394.0
05/29/90	228115	397.0
05/28/92	234627	453.0
06/17/94	249505	426.0 - Current Pressure


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Page No.: 1
Print Time: Tue Dec 22 09:11:00 1998
Property ID: 1461
Property Name: SAN JUAN 27-5 UNIT | 51 | 53382A-1 Mesa Verde
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

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Page No.: 1
Print Time: Tue Dec 22 09:11:00 1998
Property ID: 1461
Property Name: SAN JUAN 27-5 UNIT | 51 | 53382A-1 Mesa Verde
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

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Page No.: 1
Print Time: Tue Dec 22 09:11:00 1998
Property ID: 1461
Property Name: SAN JUAN 27-5 UNIT | 51 | 53382A-1 Mesa Verde
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

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Page No.: 1
Print Time: Tue Dec 22 09:11:00 1998
Property ID: 1461
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Page No.: 1
Print Time: Tue Dec 22 09:11:00 1998
Property ID: 1461
Property Name: SAN JUAN 27-5 UNIT | 51 | 53382A-1 Mesa Verde
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

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--DATE--  ---CUM GAS--  M SIWHP
|||||  |||||Mcft|||  |||Psi|||
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--DATE--  ---CUM GAS--  M SIWHP
|||||  |||||Mcft|||  |||Psi|||
```

04/11/60	0	1089.0 - Initial Pressure
04/27/60	0	1088.0
10/14/60	26000	792.0
05/28/61	47000	756.0
07/13/62	76000	777.0
04/19/63	89000	770.0
05/07/64	110000	728.0
10/25/65	141000	660.0
09/02/66	160000	633.0
05/16/67	177000	589.0
05/02/68	195000	596.0
08/28/70	234018	502.0
04/08/71	245659	577.0
07/25/72	267240	541.0
12/06/83	439434	0.0
04/07/86	468070	551.0
09/08/89	503021	527.0
05/06/91	519293	559.0
05/20/91	519257	547.0 - Current Pressure

BURLINGTON RESOURCES OIL AND GAS COMPANY

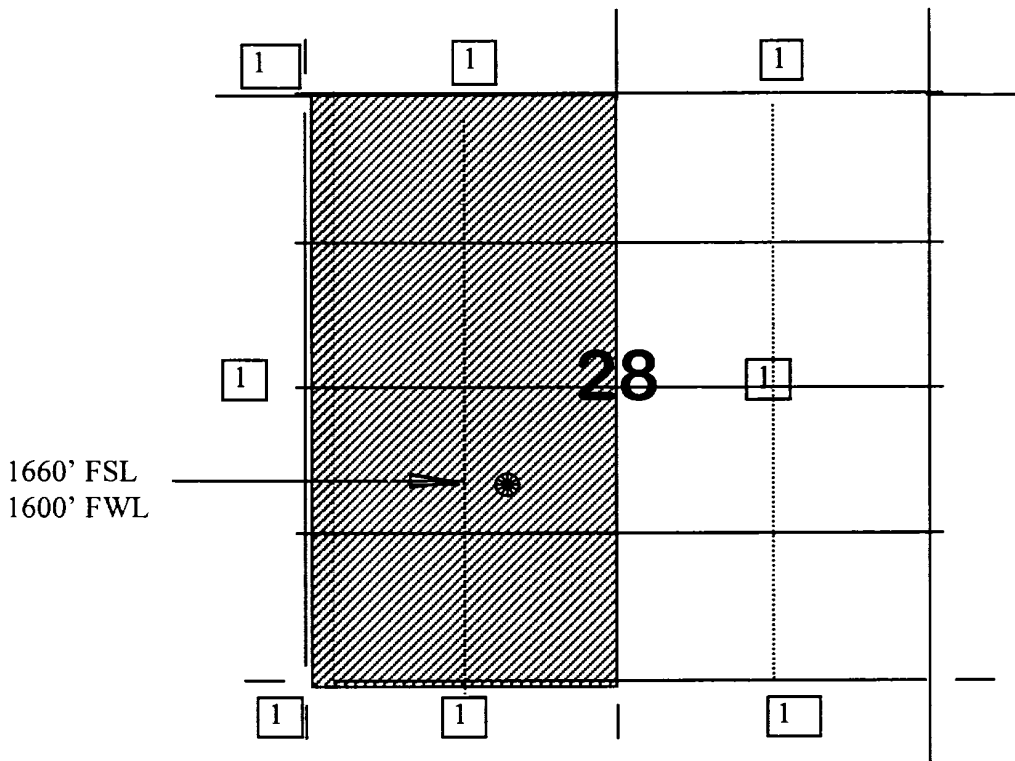
San Juan 27-5 Unit #51

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 13, 1999
NAME: SAN JUAN 27-5 UNIT #61
FORM: PICTURED CLIFFS

LOCATION
UNIT: K
SEC: 28
TWN: 27N
RNG: 6W

<div>3/68 S.J. 27-5 Unit #37 63/897 (88)</div> <div>[20]</div> <div>4/01 S.J. 27-5 Unit #68 16/232 (88)</div>	<div>4/68 S.J. 27-5 Unit #30 146/617 (88)</div> <div>3/68 S.J. 27-5 Unit #41 104/477 (88)</div> <div>7/73 S.J. 27-5 Unit #154 3/231 (88)</div>	<div>7/73 S.J. 27-5 Unit #156 102/1072 (88)</div> <div>7/73 S.J. 27-5 Unit #160 37/355 (88)</div> <div>6/69 S.J. 27-5 Unit # 42 76/062 (88)</div> <div>11/02 S.J. 27-5 Unit #80 08/1030 (88)</div>	<div>T 27 N</div>
<div>9/63 S.J. 27-5 Unit #4 201/060 (88)</div> <div>[28]</div>	<div>8/02 S.J. 27-5 Unit #71 67/802 (88)</div> <div>4/80 S.J. 27-5 Unit # 51 48/612 (88)</div>	<div>[27]</div>	
<div>[32]</div>	<div>[33]</div>	<div>[34]</div>	

LEGEND
COMPLETION DATE
WELL NAME
MCFD-CUM(MMF)
BOPD-CUM(MBO)

DATE: January 13, 1989
NAME: SAN JUAN 27-5 UNIT #61
FORM: MESAVERDE
LOCATION
UNIT: K
SEC: 28
TWN: 27N
RNG: 5W

<div>3/58 • S.J. 27-5 Unit #37 63/887 (see)</div> <div>2/88 • S.J. 27-5 Unit #139M 184/315 (see)</div> <div>[20]</div> <div>2/57 • S.J. 27-5 Unit #19 78/1315 (see)</div> <div>1/88 • S.J. 27-5 Unit #165M 158/888 (see)</div> <div>[28] 6/88 • S.J. 27-5 Unit #140M 160/39 (see)</div> <div>9/56 • S.J. 27-5 Unit #17 218/368 (see)</div>	<div>4/58 • S.J. 27-5 Unit #30 145/617 (see)</div> <div>3/59 • S.J. 27-5 Unit #41 104/477 (see)</div> <div>[21] 7/88 • S.J. 27-5 Unit #125E 86/78 (see)</div> <div>8/81 • S.J. 27-5 Unit #68 57/775 (see)</div> <div>1/81 • S.J. 27-5 Unit #8A 78/610 (see)</div> <div>12/54 • S.J. 27-5 Unit #8 87/2854 (see)</div> <div>79/535 (see)</div>	<div>11/54 • S.J. 27-5 Unit #9 28/284 (see)</div> <div>[22]</div> <div>6/59 • S.J. 27-5 Unit #42 76/852 (see)</div> <div>4/87 • S.J. 27-5 Unit #117 187/124 (see)</div> <div>8/81 • S.J. 27-5 Unit #68 57/878 (see)</div> <div>8/81 • S.J. 27-5 Unit #68A 92/818 (see)</div> <div>7/80 • S.J. 27-5 Unit #56 103/2156 (see)</div> <div>3/20 • S.J. 27-5 Unit #5 103/546 (see)</div> <div>[34] 3/81 • S.J. 27-5 Unit #5A 81/661 (see)</div> <div>11/53 • S.J. 27-5 Unit #5 103/546 (see)</div> <div>11/55 • S.J. 27-5 Unit #11 41/772 (see)</div> <div>[27]</div>
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LEGEND
•
COMPLETION DATE
•
WELL NAME
MCFD-CUM(MMF)
BOPD-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. Stogne: 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, 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-Picture 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 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 Pictured 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 Picured Cliffs and Dakota formations as "marginal", supporting data to verify the Picured 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 H. LEMAY
Director

S E A L