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

SIGNATURE: Kannett un. Collis

TYPE OR PRINT NAME: Ken Collins

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

APPLICATION FOR DOWNHOLE COMMINGLING

2040 S. Pacheco Santa Fe, New Mexico 87505-6429 Form C-107-A New 3-12-96

APPROVAL PROCESS :

X Administrative ___Hearing

EXISTING WELLBORE

X YES ___ NO

Burlington Resources Oil & Gas Company PO Box 4289, Farmington, NM 87499 106 Rio Arriba San Juan 27-5 Unit G 01-27N-05W Unit Ltr. - Sec - Twp - Rge County Spacing Unit Lease Types: (check 1 or more) OGRID NO. 14538 7454 API NO. 30-039-20025 **Property Code** Federal x State (and/or) Fee The following facts are submitted in support of downhole commingling: Intermediate Zone 1. Pool Name and Pool Code Blanco Mesaverde - 72319 Basin Dakota - 71599 and the same of the same of the 2. Top and Bottom of Pay Section (Perforations) will be supplied upon completion will be supplied upon completion 3. Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) flowing MAR 2 5 1999 flowing (Current) a. 767 psi (see attachment) 5. Bottomhole Pressure dil con. div. a. 1024 psi (see attachment) Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current DIGI. 3 (Original) b. 1326 psi (see attachment) b. 3043 psi (see attachment) All Gas Zones: Estimated or Measured Original BTU 1189 6. Oil Gravity (API) or Gas BTU Content BTU 1120 7. Producing or Shut-In? shut in shut in Production Marginal? (ves or no) no yes If Shut-In and oil/gas/water rates of last production Date: n/a Date: Date: n/a Rates: Rates: Rates: 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: n/a Date: Date: n/a Gas: Gas: % 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: Oil: Gas: Oil: will be supplied upon completion will be supplied upon completion 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? If not, have all working, overriding, and royalty interests been notified by certified mail? Yes _x _ Have all offset operators been given written notice of the proposed downhole commingling? X_Yes ____ 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). ___Reference Order _ _R-10694__ 16. ATTACHMENTS IENTS: * 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.

TITLE: Production Engineer

TELEPHONE NO.:

DATE: 03-08-99

(505) 326-9700

District I PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV

PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-102
Revised February 21, 1994
Instructions on back

Submit to Appropriate District Office State Lease - 4 Copies

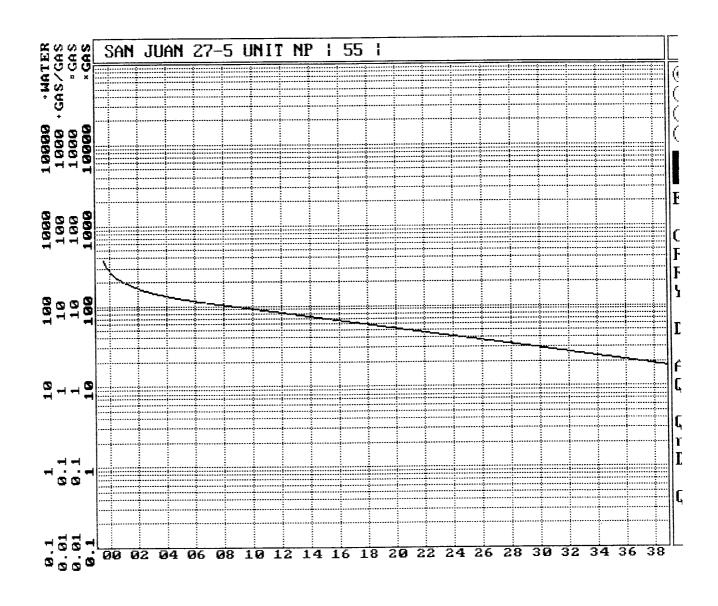
Fee Lease - 3 Copies

■ AMENDED REPORT

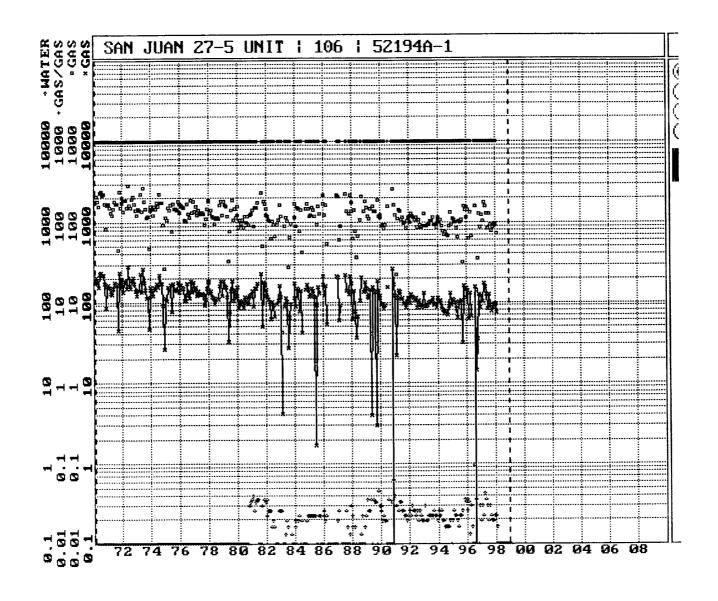
WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number				² Pool Code			³ Pool Name					
30-039-20025			723	72319/71599			Blanco Mesaverde/Basin Dakota					
⁴ Property Code			⁵ Property Name					* Well Number				
7454				San J	Tuan 2	7-5	Unit	106				106
OGRID No.					Operator Name					* Elevation		
14538 Bu			ırling	clington Resources Oil & Gas Cor					manv			7360' GE
				<u> </u>			Location					
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the		North/South line Feet fro		t from the	he East/West line		County
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11 Bottom Hole Location								om	Surface			
UL or lot no.	Section			Lot Idn					t from the	East/West line		County
MV-E/32	o int	or Infill 14 (Consolidatio	on Code 15 C	order No.							
DK-N/32	0 36							., . 				
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San Juan 27-5 Unit #106 Expected Production Curve Mesaverde Formation



San Juan 27-5 Unit #106 Actual Production Existing Dakota



San Juan 27-5 Unit #106

Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method Version 1.0 3/13/94

Mesaverde	Dakota				
<u>MV-Current</u>	DK-Current				
GAS GRAVITY 0.697 COND. OR MISC. (C/M) C %N2 0.16 %CO2 0.92 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 6490 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 137 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 646 BOTTOMHOLE PRESSURE (PSIA) 766.7	GAS GRAVITY COND. OR MISC. (C/M) %N2				
MV-Original	<u>DK-Original</u>				
GAS GRAVITY COND. OR MISC. (C/M) %N2 %N2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1325.7	GAS GRAVITY 0.661 COND. OR MISC. (C/M) C %N2 0.2 %CO2 1.45 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 8397 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 198 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 2449 BOTTOMHOLE PRESSURE (PSIA) 3043.3				

Page No.: 1
Print Time: Thu Feb 18 09:31:48 1999
Property ID: 11426
Property Name: SAN JUAN 27-5 UNIT NP | 55 | 43831A-1
Table Name: K:\ARIES\RR99PDP\TEST.DBF

DATE	CUM_GAS	M SIWHP	
06/11/60	0	1101.0	San Juan 27-5 Unit #106
06/09/70	115181	554.0	1.0%
07/30/71	127608	596.0	Mesaverde Offset
05/30/72	136456	629.0	
04/21/86	288889	495.0	
05/10/89	312590	646.0	

Page No.: 1
Print Time: Thu Feb 18 09:29:44 1999

Property ID: 1319

Property Name: SAN JUAN 27-5 UNIT | 106 | 52194A-1 Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

DATE	CUM_GAS Mcf	M SIWHP Psi	
06/05/67	0	2449.0	
10/31/67	50000	1367.0	
08/14/68	132000	1339.0	
05/29/69	209000	1015.0	
08/14/69	233893	1339.0	
06/09/70	291173	931.0	
09/16/71	363836	1092.0	
05/30/72	407113	1037.0	
05/16/73	470423	957.0	
06/23/75	577223	919.0	
06/25/76	631007	975.0	
07/06/77	687105	1011.0	
05/01/79	775151	1007.0	
05/21/81	863636	844.0	
09/21/83	940295	1091.0	
06/05/85	1002175	975.0	
05/20/88	1093290	1260.0	
07/31/90	1175807	884.0	
09/08/92	1256448	839.0	

San Juan 27-5 Unit #106

Existing Dakota

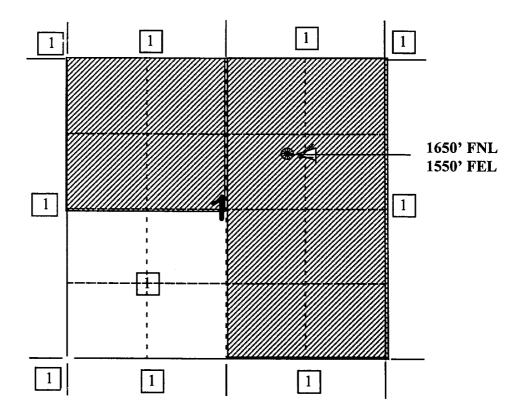
BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #106

OFFSET OPERATOR/OWNER PLAT

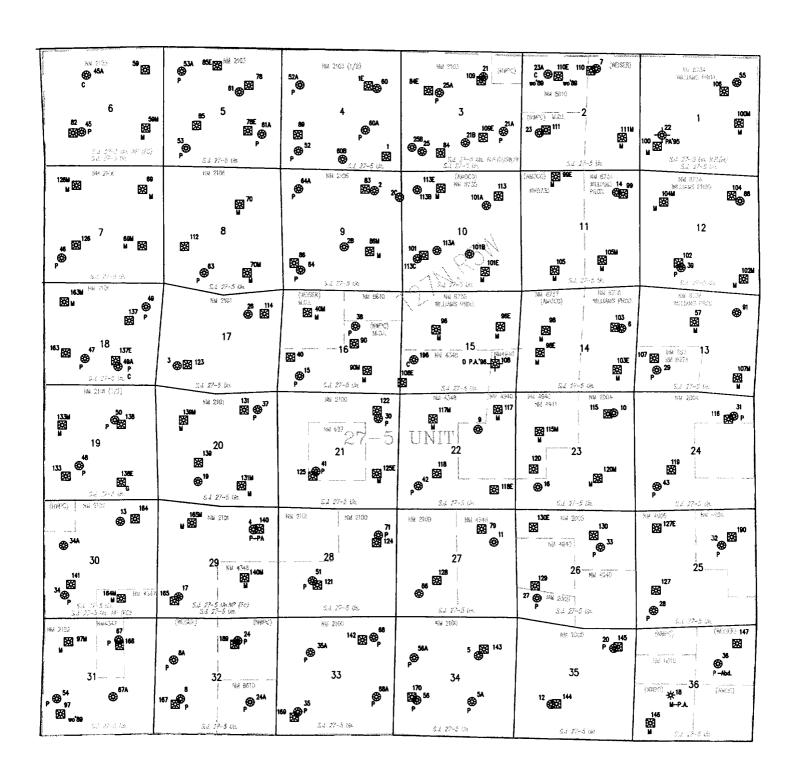
Mesaverde (E/2) / Dakota (N/2) Formations Commingle Well

Township 27 North, Range 5 West



1) Burlington Resources

San Juan 27-5 Unit #106 27N - 5W - 01 Mesaverde / Dakota



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:

- RIO. ARRIBA

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

"If sufficient data exists on a lease, pool, formation, geographic area, em., 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 commingie (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 weils, one hundred and five (105) Blanco-Mesaverde Gas Pool weils, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool weils, and four (4) Basin-Fruitland Coal Gas Pool weils.
 - (6) According to its evidence and testimony, Burlington seeks to:
 - 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:

- establish a "reference case" whereby the Division unitizes 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 Units and.
- d) establish a "reference case" or an administrative procedure for authorizing the downhole commingting of existing or future drilled wells within the San Juan 27-5 Unit without additional nonce 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 Dakora and Picmred Cliffs gas reserves underlying an undeveloped drill block are approximately 533 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 the Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit should be properly classified as "marginai".
 - (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 bottominole 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 bottominole 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 resulted that various allocation methods will be unitized 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:
 - the subtraction method will likely be utilized in those instances involving the Hasin-Fruitiand 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 unliked by 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:
 - the interest ownership between two zones within a given weilbore 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 units

- c) providing notice to each interest owner within the San Juan 27-5
 Unit of subsequent downnote communitings is unnecessary and is
 an excessive burden on the applicant:
- d) the downhole commingting of wells within the San Juan 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole comminging 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 commingied wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are compiled with.
- 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 C-107-A, will provide the applicant a streamlined method for obtaining downtole comminging approvals within the San Juan 27-5 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Euriington 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 downtool commingting of Dakota. Mesaverue. Fruitiand 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 communied within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictures Cliffs and Dakota formations as "marginal", supporting data to verify the Pictures 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 wells within the San Juan 27-5 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Azrec 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 Sama Fe. New Mexico. on the day and year hereinabove designated.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J/ Lemay

Director