

# BURLINGTON RESOURCES

SAN JUAN DIVISION

January 31, 1997

SENT FEDERAL EXPRESS

Mr. William LeMay  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

**RECEIVED**  
FEB - 5 1997  
**OIL CON. DIV.**  
**DIST. 3**

Re: San Juan 27-5 Unit #117  
800'FNL, 800'FEL Section 22, T-27-N, R-5-W, Rio Arriba County, NM  
API #30-039-20221 A

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota pools in the subject well. This is well was originally drilled as a Dakota; it is intended to add the Mesa Verde and commingle.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas is submitting the following for your approval of this commingling:

1. Form C107A - Application for Downhole Commingling;
2. C-102 plat for each zone showing its spacing unit and acreage dedication;
3. Production curve for the Dakota for at least one year;
4. Notification list of offset operators - Meridian is operator of San Juan 27-5 Unit;
5. Shut in wellhead pressure and calculated down hole pressure;
6. Nine-section plats for the Mesa Verde and Dakota

Notification of Mesa Verde and Dakota interest owners is covered under Reference Order #R-10694 issued November 12, 1996 attached.

We will consult with the Supervisor of the Aztec District Office of the New Mexico Oil Conservation Division to establish an allocation formula.

Please let me know if you require additional data.

Sincerely,

  
Peggy Bradfield  
Regulatory/Compliance Administrator

encs.

xc: Bureau of Land Management

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  
EXISTING WELLBORE  
\_X\_ YES \_\_\_ NO

APPLICATION FOR DOWNHOLE COMMINGLING

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

Operator Address  
San Juan 27-5 Unit 117 A 22-27-5 Rio Arriba  
Lease Well No. Unit Ltr. - Sec - Twp - Rge County  
Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7455 API NO. 30-039-20221 Federal X State (and/or) Fee X

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	5061-5726 (est)		7582-7852
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: All Gas Zones: Estimated Current Measured Current Estimated or Measured Original	(Current) a. 886 psi (est)  (Original) b. 994 psi (est)		a. 979 psi  b. 3286 psi
6. Oil Gravity (°API) or Gas BTU Content	1188		1142
7. Producing or Shut-In?	not yet completed		producing
Production Marginal? (yes or no)	no		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: n/a Rates:	Date: Rates:	Date: n/a Rates:
* If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: Rates:	Date: Rates:	Date: 12-29-96 Rates: 236 mcf/d; 0 bwpd; 0.55 bopd
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: % Gas: % will be supplied upon completion	Oil: % Gas: %	Oil: % Gas: % will 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 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? X 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? 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 attached
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 TITLE Production Engineer DATE 1/30/97  
TYPE OR PRINT NAME Lori Lantz TELEPHONE NO. ( 505 ) 326-9700

**MEXICO OIL CONSERVATION COMMISSION**  
**WELL LOCATION AND ACREAGE DEDICATION PLAT**

Form 2-1-68  
 Supersedes 1-1-68  
 Effective 1-1-68

All distances must be from the outer boundaries of the Section

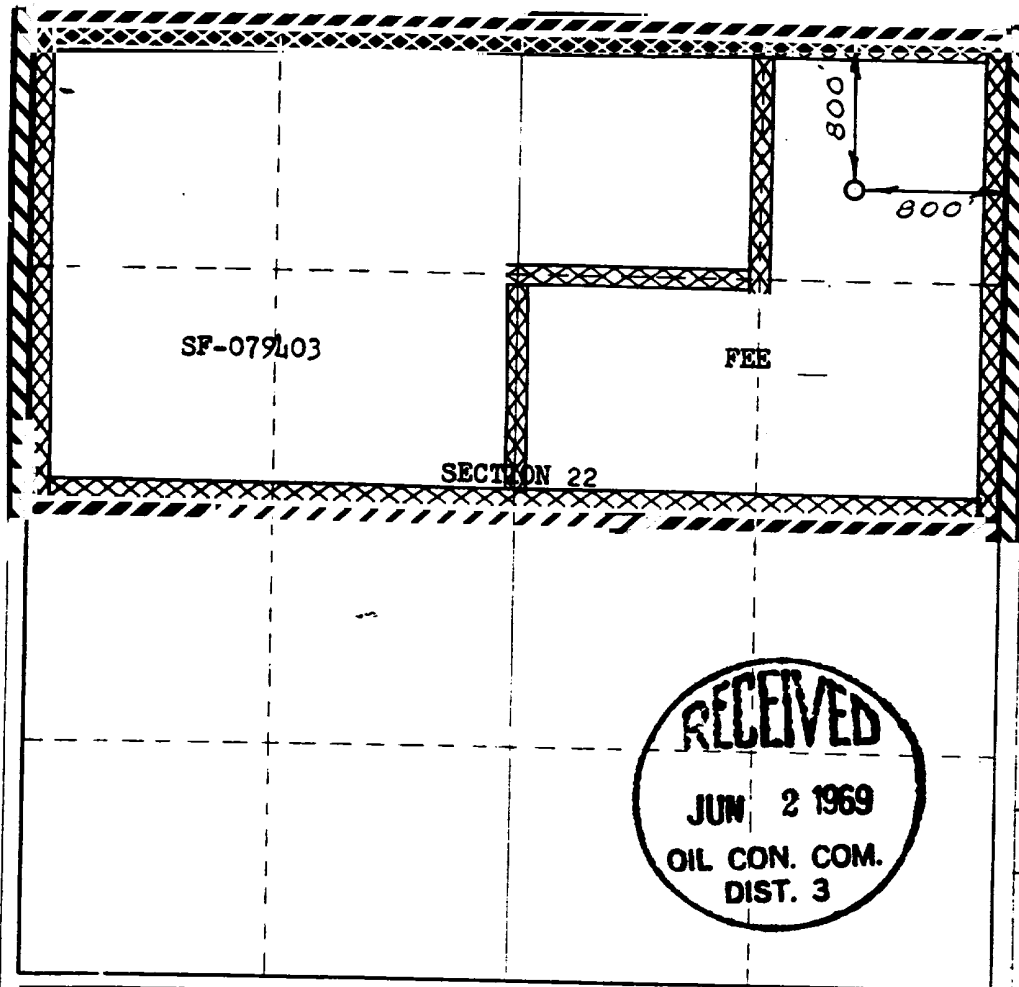
<b>EL PASO NATURAL GAS COMPANY</b>				<b>Lease- SAN JUAN 27-5 UNIT</b>		<b>(FEE)</b>	<b>117</b>
<b>A</b>	<b>22</b>	<b>27-N</b>	<b>5-W</b>	<b>RIO ARRIBA</b>			
Actual Footage Location of Well: <b>800</b> feet from the <b>NORTH</b> line and <b>800</b> feet from the <b>EAST</b> line.							
<b>6593</b>	<b>DAKOTA/Mesa Verde</b>	<b>BASIN DAKOTA /Blanco</b>	<b>320.00</b>				

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.



**CERTIFICATION**

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

**Original Signed By:**

**L. O. Van Ryan**  
**Petroleum Engineer**

**El Paso Natural Gas Co.**

**May 29, 1969**

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.

**MARCH 28, 1969**

*David O. Kline*  
 1760

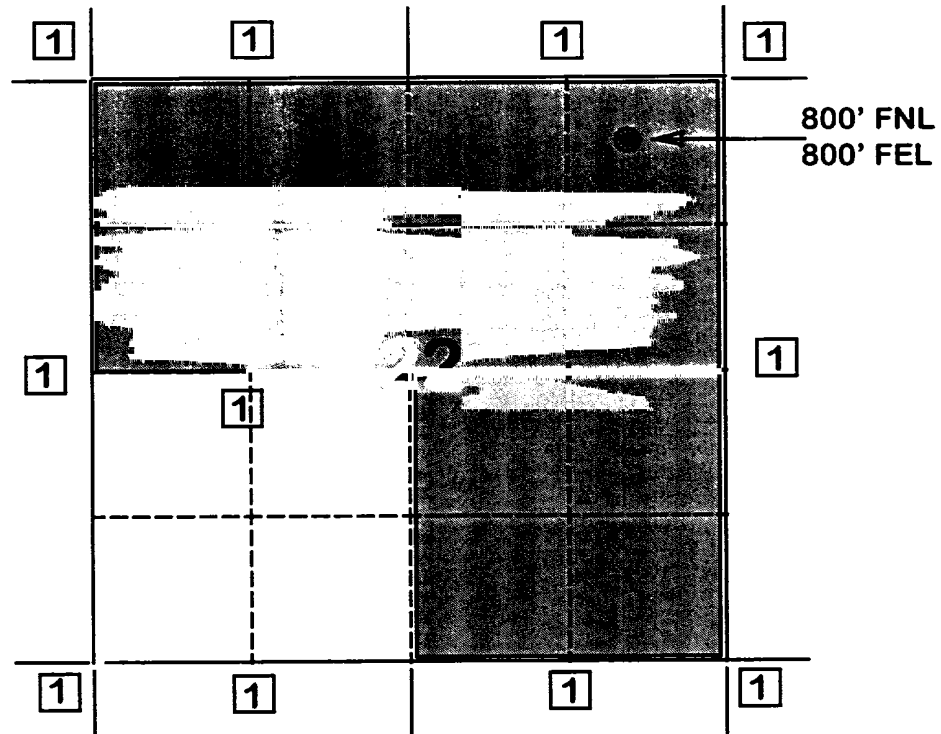
0 500 1000 1500 2000 2500 3000 3500 4000 4500 5000

***BURLINGTON RESOURCES OIL AND GAS COMPANY***

**San Juan 27-5 Unit #117  
OFFSET OPERATOR \ OWNER PLAT**

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

**Township 27 North, Range 5 West**



**1) Burlington Resources Oil and Gas Company Successor to Meridian Oil Inc.**

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REQUESTED RECORD NOT FOUND (NEXT RECORD DISPLAYED)

OPR008M1 G020

0008 CHROMATOGRAPH TEST MAIN SCREEN

16:12:30.6 12/31/9

FUNCTION (A,C,D,I) i \*\* DATA AT TEST PRESSURE UNLESS NOTED \*\*  
 MP NUMBER 87040 SAN JUAN 27-5 UNIT 117  
 EFFECTIVE DATE 19960501  
 REGION CD 42 SAN JUAN  
 MP TYPE CODE 10 GAS METER - WELLHEAD SALES

-----  
 SAMPLE TYPE CODE (GAS,LIQ,BTU) GAS ----- BTU/CF -----  
 SAMPLE DATE 19960501 --- (AT 14.73 PSIG) ---  
 SAMPLE LINE PRESSURE (PSIG) WET 1122.145 DRY 1142.000  
 SAMPLE LINE TEMPERATURE (DEG F) -----  
 TEST DATE ----- BTU/CF -----  
 TEST PRESSURE (PSIG) 14.730 WET 1122.145 DRY 1142.000  
 TEST TEMPERATURE (DEG F) 60 VAPOR FACTOR -----  
 TEST LIFE (MONTHS) 6  
 TESTER SOURCE BA NUMBER 038689 PETROLEUM LAND CORP  
 TEST PURPOSE CODE -----

-----  
 03=DETAIL SCR 04=MP-NM BRWS 06=MP/DS LST 07=MP/WN LST  
 11=PREV SCR 12=MAIN MENU 20=NEXT REC  
 21=REFRESH SCR 22=PREV MENU 24=HELP PA1=TERMINATE  
 B MY JOB LU #22

OPR008M2 G020

0008 CHROMATOGRAPH GAS SAMPLE DETAIL

16:12:49.1 12/31/9

MP NUMBER 87040  
 EFFECTIVE DATE 19960501  
 \*\* DATA AT 14.730 PSIG UNLESS NOTED \*\*  
 GPM  
 MOL % (AT 14.73)  
 HYDROGEN  
 HELIUM  
 NITROGEN 0.28  
 OXYGEN  
 HYDROGEN SULFIDE  
 CARBON DIOXIDE 1.43  
 METHANE 87.05  
 ETHANE 7.39 1.9768  
 PROPANE 1.78 0.4906  
 ISO-BUTANE 0.46 0.1505  
 N-BUTANE 0.54 0.1703  
 ISO-PENTANE 0.31 0.1134  
 N-PENTANE 0.21 0.0761  
 HEXANE  
 HEXANE PLUS 0.55 0.2400  
 HEPTANE PLUS  
 TOTALS 100.00 3.2177  
 -- GASOLINE CONTENT (GPM) --  
 26/70 GASOLINE  
 100% PROPANE  
 EXCESS BUTANES  
 TOTAL  
 ----- SPECIFIC GRAVITY -----  
 CALCULATED 0.6630  
 MEASURED  
 SULPHUR GRAINS / 100 CU FT

-----  
 03=MAIN SCREEN 24=HELP PA1=TERMINATE  
 B MY JOB NUM LU #22

REQUESTED RECORD NOT FOUND (NEXT RECORD DISPLAYED)

OPR008M1 G020

0008 CHROMATOGRAPH TEST MAIN SCREEN

16:13:05.0 12/31/9

FUNCTION (A,C,D,I) i \*\* DATA AT TEST PRESSURE UNLESS NOTED \*\*  
 MP NUMBER 71311 SAN JUAN 27-5 UNIT 9  
 EFFECTIVE DATE 19940201  
 REGION CD 42 SAN JUAN  
 MP TYPE CODE 10 GAS METER - WELLHEAD SALES

-----  
 SAMPLE TYPE CODE (GAS,LIQ,BTU) GAS ----- BTU/CF -----  
 SAMPLE DATE 19940222 --- (AT 14.73 PSIG) --  
 SAMPLE LINE PRESSURE (PSIG) ----- WET 1167.345 DRY 1188.000  
 SAMPLE LINE TEMPERATURE (DEG F) -----  
 TEST DATE ----- BTU/CF -----  
 TEST PRESSURE (PSIG) 14.730 WET 1167.345 DRY 1188.000  
 TEST TEMPERATURE (DEG F) 60 VAPOR FACTOR -----  
 TEST LIFE (MONTHS) 6  
 TESTER SOURCE BA NUMBER 038689 PETROLEUM LAND CORP  
 TEST PURPOSE CODE -----

-----  
 03=DETAIL SCR 04=MP-NM BRWS 06=MP/DS LST 07=MP/WN LST  
 11=PREV SCR 12=MAIN MENU 20=NEXT REC  
 21=REFRESH SCR 22=PREV MENU 24=HELP PA1=TERMINATE  
 B MY JOB LU #22

OPR008M2 G020

0008 CHROMATOGRAPH GAS SAMPLE DETAIL

16:13:50.0 12/31/9

GPM \*\* DATA AT 14.730 PSIG UNLESS NOTED \*\*  
 MOL % (AT 14.73)  
 HYDROGEN ----- MP NUMBER 71311  
 HELIUM ----- EFFECTIVE DATE 19940201  
 NITROGEN 0.24  
 OXYGEN -----  
 HYDROGEN SULFIDE ----- -- GASOLINE CONTENT (GPM) --  
 CARBON DIOXIDE 0.77 26/70 GASOLINE -----  
 METHANE 84.52 100% PROPANE -----  
 ETHANE 8.29 2.2176 EXCESS BUTANES -----  
 PROPANE 3.72 1.0252 TOTAL -----  
 ISO-BUTANE 0.67 0.2192  
 N-BUTANE 0.97 0.3058  
 ISO-PENTANE 0.37 0.1354  
 N-PENTANE 0.29 0.1050  
 HEXANE -----  
 HEXANE PLUS 0.16 0.0698  
 HEPTANE PLUS -----  
 TOTALS 100.00 4.0780  
 -----  
 ----- SPECIFIC GRAVITY -----  
 CALCULATED 0.6810  
 MEASURED -----  
 SULPHUR GRAINS / 100 CU FT -----

-----  
 03=MAIN SCREEN 24=HELP PA1=TERMINATE  
 B MY JOB NUM LU #22

**FLOWING AND STATIC BHP  
CULLENDER AND SMITH METHOD**  
VERSION 1.0 3/13/94

GAS GRAVITY	0.663
COND. OR MISC. (C/M)	M
%N2	0.28
%CO2	1.43
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	7717
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	190
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	2684
BOTTOMHOLE PRESSURE (PSIA)	3286.4

San Juan 27-5 Unit #117 - Dakota  
Initial Bottomhole Pressure



**FLOWING AND STATIC BHP  
CULLENDER AND SMITH METHOD**

VERSION 1.0 3/13/94

GAS GRAVITY	0.663
COND. OR MISC. (C/M)	M
%N2	0.28
%CO2	1.43
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	7717
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	190
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	813
BOTTOMHOLE PRESSURE (PSIA)	978.6

San Juan 27-5 Unit #117 - Dakota  
Current Bottomhole Pressure

**FLOWING AND STATIC BHP  
CULLENDER AND SMITH METHOD**

VERSION 1.0 3/13/94

GAS GRAVITY	0.681
COND. OR MISC. (C/M)	M
%N2	0.24
%CO2	0.77
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	5394
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	120
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	857
BOTTOMHOLE PRESSURE (PSIA)	993.7

San Juan 27-5 Unit #117 - Mesaverde  
Initial Bottomhole Pressure

FLOWING AND STATIC BHP  
CULLENDER AND SMITH METHOD  
VERSION 1.0 3/13/94

GAS GRAVITY	0.681
COND. OR MISC. (C/M)	M
%N2	0.24
%CO2	0.77
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	5394
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	120
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	766
BOTTOMHOLE PRESSURE (PSIA)	885.8

San Juan 27-5 Unit #117 - Mesaverde  
Current Bottomhole Pressure

FDG055M4 G020  
START OF DATA  
DP NO: 52281A  
SAN JUAN 27-5 UNIT  
S

WELL PRODUCTION 8/8'S VOLUME

12/31/96 16:09:1

DATE: 961229 (YYMMDD FORMAT)

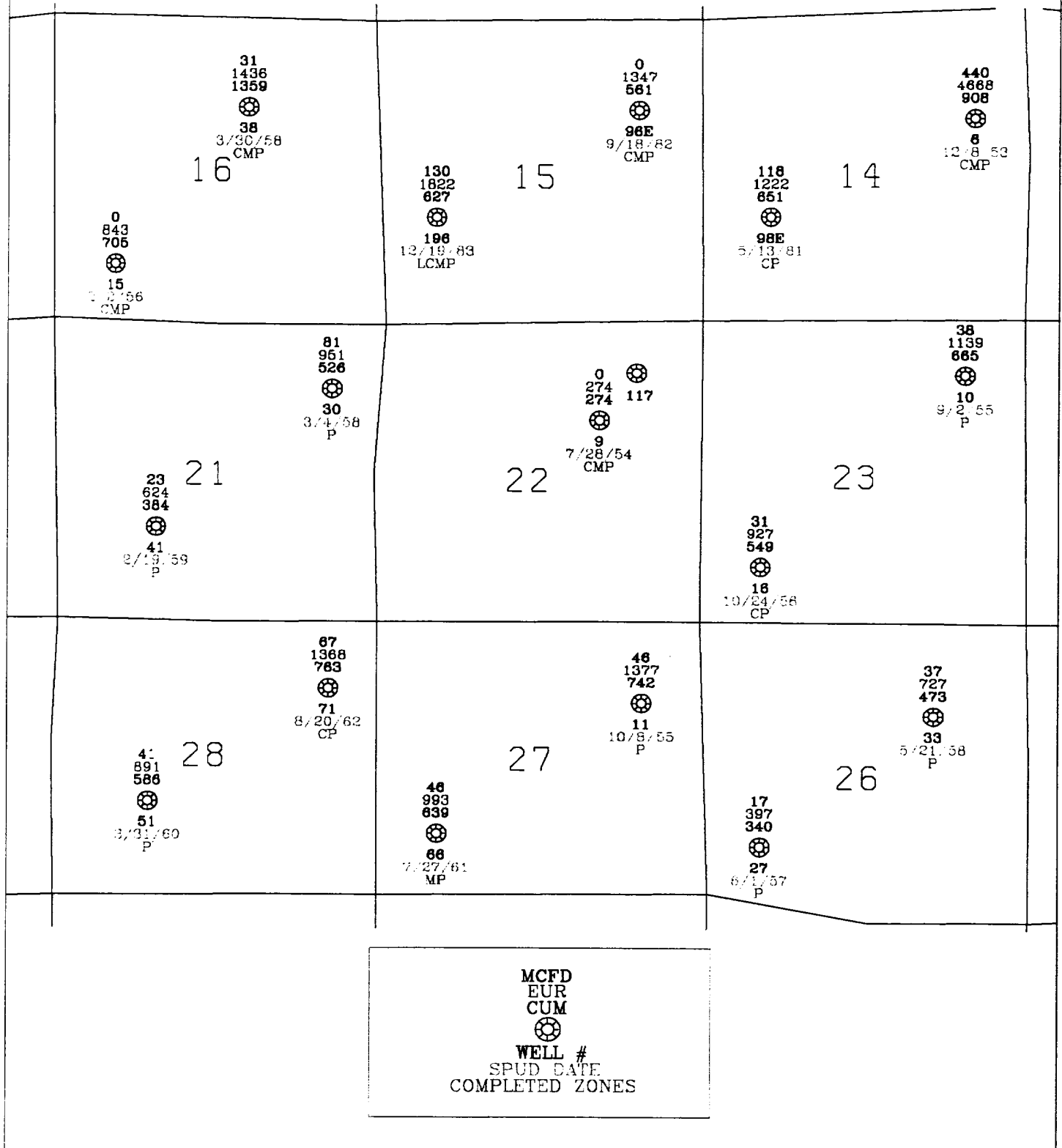
117 SCROLL FORWARD BY DATE: \_

E	DATE	HOURS	-OIL PRODN-	-GAS PRODN-	-WATER PRODN-
L	PRODUCED	ON	(BOPD BOPM)	(MCFD MCFM)	(BWPD BWPM)
-	12/29/96	24.0	0.55 16.21	236 7491	0.00 0.00
-	12/28/96	24.0	0.55 15.66	236 7255	0.00 0.00
-	12/27/96	24.0	0.55 15.11	236 7019	0.00 0.00
-	12/26/96	24.0	0.56 14.56	236 6783	0.00 0.00
-	12/25/96	24.0	0.56 14.00	236 6547	0.00 0.00
-	12/24/96	24.0	0.56 13.44	249 6311	0.00 0.00
-	12/23/96	24.0	0.56 12.88	249 6062	0.00 0.00
-	12/22/96	24.0	0.56 12.32	249 5813	0.00 0.00
-	12/21/96	24.0	0.56 11.76	249 5564	0.00 0.00
-	12/20/96	24.0	0.56 11.20	249 5315	0.00 0.00
-	12/19/96	24.0	0.56 10.64	249 5066	0.00 0.00

ENTER I UNDER SEL FOR MAINTENANCE

PF12=MAIN MENU PF6=NRI PF10=BROWSE MENU PF11=INQ/UPDATE MENU  
B MY JOB ENTER=BACKWARDS PF24=HELP  
LU #22

SAN JUAN 27-5 UNIT #117  
SECTION 22A, T27N, R5W  
RIO ARRIBA COUNTY, NM



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 the 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:

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- 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 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:

- 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 C-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.

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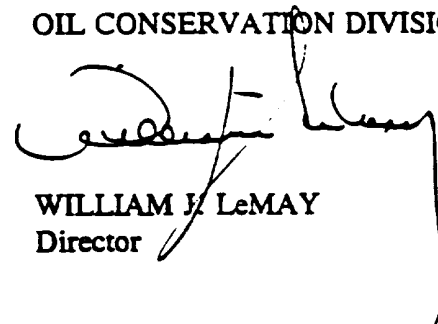
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify 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 wells 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