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

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		4289, Farmingto	on, NM 8749	9		
Operator San Juan 27-5 Unit Lease	118 Well No.	Address K 22-27 Unit Ltr S	N-05W ec - Twp - Rge		Rio Arriba		
OGRID NO. 14538 Property Co	de 7454 API NO.	30-039-20318	Federal		g Unit Lease Types: (check 1 or more) (and/or) Fee		
The following facts are submitted in support of downhole commingling:	Upper Zone		Intermedi Zone	ate	Lower Zone		
Pool Name and Pool Code	Blanco Mesaverde - 723			· · · · · · · · · · · · · · · · · · ·	Basin Dakota - 71599		
2. Top and Bottom of Pay Section (Perforations)	will be supplied upon co	ompletion		-	will be supplied upon completion		
3. Type of production (Oil or Gas)	gas			***************************************	gas		
Method of Production (Flowing or Artificial Lift)	flowing	ln)			flowing		
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 454 psi (see attachm	ent)	MAR 2 5 19	199	a. 1009 psi (see attachment)		
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1269 psi (see attachr	nent) (0)	l Con.	DUV.	b. 3152 psi (see attachment)		
6. Oil Gravity (API) or Gas BTU Content	BTU 1185		DIST. 3		BTU 1115		
7. Producing or Shut-In?	shut in	والراز والمواد المحادة	The second of th	t in the state of	shut in		
Production Marginal? (yes or no)	no				yes		
* If Shut-In and oil/gas/water rates of last production	Date: n/a Rates:	Da Ra	te:		Date: n/a 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 Rates:	Da Ra	te: tes:		Date: n/a Rates:		
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: %	Oil	: Gas: %		Oil: Gas: %		
9. If allocation formula is based up attachments with supporting data	will be supplied upon complet	an current or	past production	, or is based	upon some other method, submi		
10. Are all working, overriding, and ro If not, have all working, overriding Have all offset operators been giv							
 Will cross-flow occur? _x_ \ production be recovered, and will 	es No If yes, are the allocation formula t	fluids compa pe reliable	tible, will the for	mations not I o (If No, attac	be damaged will any cross-flower		
2. Are all produced fluids from all co							
3. Will the value of production be dec				-	•		
4. If this well is on, or communitized Land Management has been notified	d with, state or federal le ed in writing of this appli	ands, either th cationX\	ne Commissioner 'es No	of Public La	nds or the United States Bureau o		
5. NMOCD Reference Cases for Rule	303(D) Exceptions: OR	DER NO(S).	_Reference Orde	rR-10694	attached		
16. ATTACHMENTS: * C-102 for each zone to	be commingled showing	g its spacing u	nit and acreage o	ledication.			

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

State of New Mexico Energy, Minerals & Natural Resources Department

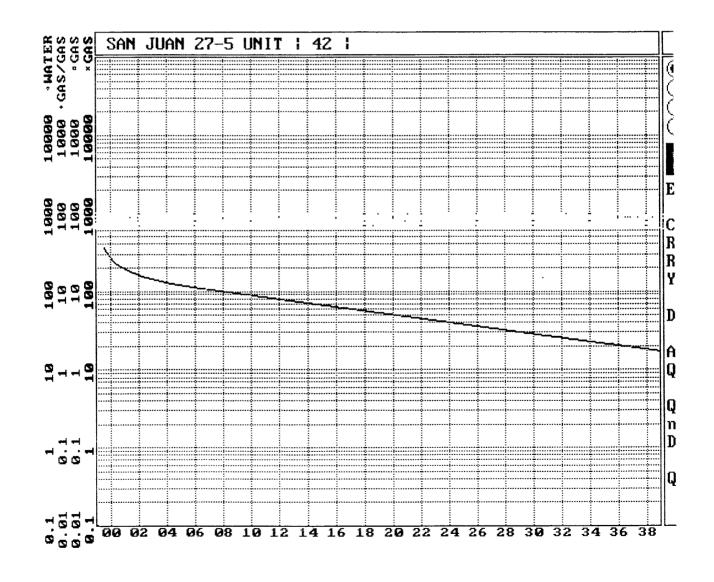
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-102 Revised February 21, 1994 Instructions on back Submit to Appropriate District Office

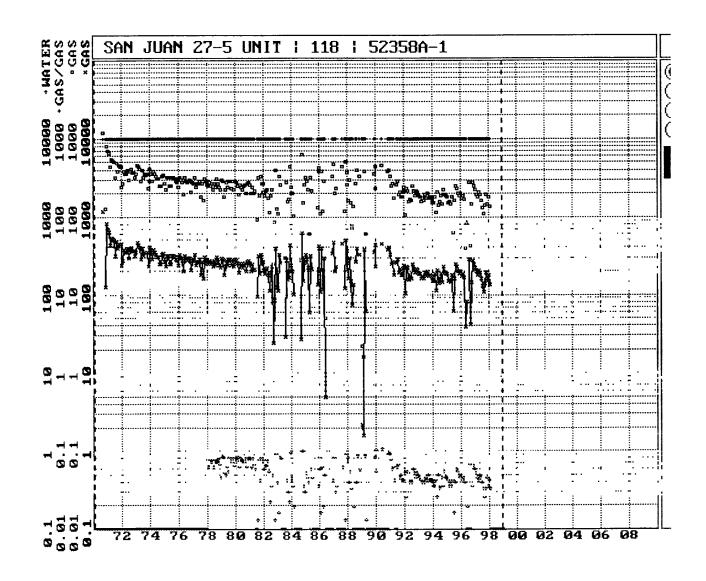
State Lease - 4 Copies Fee Lease - 3 Copies

Section 22	22	er	723	* Pool Cod 319/71 San J	599 verify verif	Blan perty N -5 U erator N	Unit Name	¹ Pool N	ame	•	
Section 22	9-20318 erty Code 4 RID No. Section 22	Bu	rling:	San John Re	599 'Pmuan 27 'opusource	operty N -5 T erator N	Vame Unit Name			•	
Section 2 2	RID No. Section 22	Township	Range 5W	ton Re	'Prouan 27	operty N -5 T erator N	Vame Unit Name			•	
Section 22 Section	no. Section 22	Township	Range 5W		source	s 0:				* Well Number	
Section Joint	no. Section 22	Township	Range 5W		source ¹⁰ Surf	s 0			¹ Elevation		* Elevation
Section Joint	22	Township	Range 5W		10 Surf		on Resources Oil & Gas Compa				557 GR
Section Joint	22	1 '	5W	Lot Idn		¹⁰ Surface Location					
Section 13 Joint		27N			Feet from	the	North/South line	Feet from the	East/West	line	County
Joint	so Cardia			<u> </u>	1600		South	1815	West		RA
Joint	na C!	1		· · · · · · · · · · · · · · · · · · ·	,		Different Fro				
0]	PO. Section	Township	Range	Lot Idn	Feet from	the	North/South line	Feet from the	East/West	line	County
	320 320	or Infill 14 (Consolidatio	n Code 15 C	order No.						
							N UNTIL ALL EN APPROVED			EN CO	NSOLIDATED
		* 2 5 16 * 2 5 16 * 2 5 16) 199 DIV.	Or Da	iginal vid O.	pla Vil	at from lven 3-12-	7 0 Signature Peggy Printed Na Regul Title Date	Rradf me atory	formation est of my ield Admi	TIFICATION contained herein is knowledge and belief
15'	1815'	,009	······································	Property Community Communi				I hereby cer was plotted or under my correct to th	tify that the wi from field not v supervision, i ne best of my b	ell location to the control of the c	al surveys made by m he same is true and
15	1815		,009/						was plotted or under my correct to the Date of Sur Signature as	was plotted from field not or under my supervision, correct to the best of my leading to the best of my leading to the best of property of Signature and Scal of Property Signature Signatur	Date of Survey Signature and Seal of Professional

San Juan 27-5 Unit #118 Expected Production Curve Mesaverde Formation



San Juan 27-5 Unit #118 Actual Production Dakota Formation



San Juan 27-5 Unit #118

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

Mesaverde	Dakota
MV-Current	DK-Current
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 0.601 C C 0.68 454.1	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1.65 60 60 841
MV-Original	<u>DK-Original</u>
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 0.68 %H2S 0 DIAMETER (IN) 2 DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) 1116 BOTTOMHOLE PRESSURE (PSIA) 1268.8	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.33 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3151.6

Q:\AREA\IMVPUD\COMGLS\BHP.xls

Page No.: 1

Print Time: Tue Feb 23 16:16:08 1999

Property ID: 11848
Property Name: SAN JUAN 27-5 UNIT | 42 | 53374B-1
Table Name: K:\ARIES\RR99PDP\TEST.DBF

	CUM_GAS		
06/12/59	0	1116.0	San Juan 27-5 Unit #118
10/07/70	325035	592.0	
07/22/71	340186	559.0	Mesaverde Offset
06/06/72	357122	555.0	
12/20/84	514669	441.0	
11/04/86	525343	496.0	
05/10/89	530044	404.0	

Page No.: 1

Print Time: Tue Feb 23 16:14:29 1999

Property ID: 1338
Property Name: SAN JUAN 27-5 UNIT | 118 | 52358A-1
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

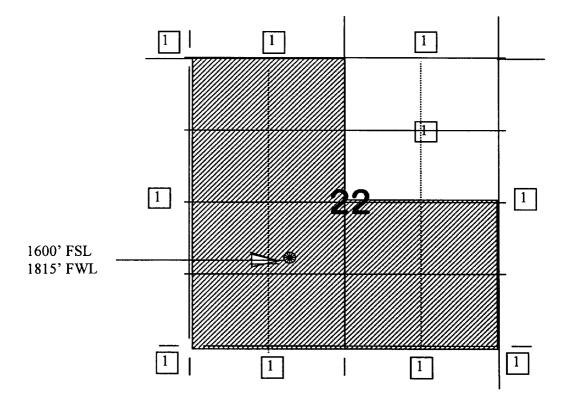
	CUM_GAS		
06/26/70 12/28/70	0 64603	2588.0 1747.0	San Juan 27-5 Unit #118
07/22/71	176060	1271.0	Existing Dakota
06/06/72 07/19/73	304085 449862	974.0	
05/22/75 07/06/77	657624 876418	791.0	
05/01/79 05/04/81	1047418 1228091	861.0 780.0	
09/13/83 11/21/83	137 4 268 1396871		
06/04/85 06/04/86	1490660 1546938	925.0 970.0	
06/28/88 06/01/90	1661019 1749400		
05/28/92	1879658	841.0	

BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #118 OFFSET OPERATOR/OWNER PLAT

Commingle Well Mesaverde (W/2) /Dakota (S/2) Formations Well

Township 27 North, Range 5 West

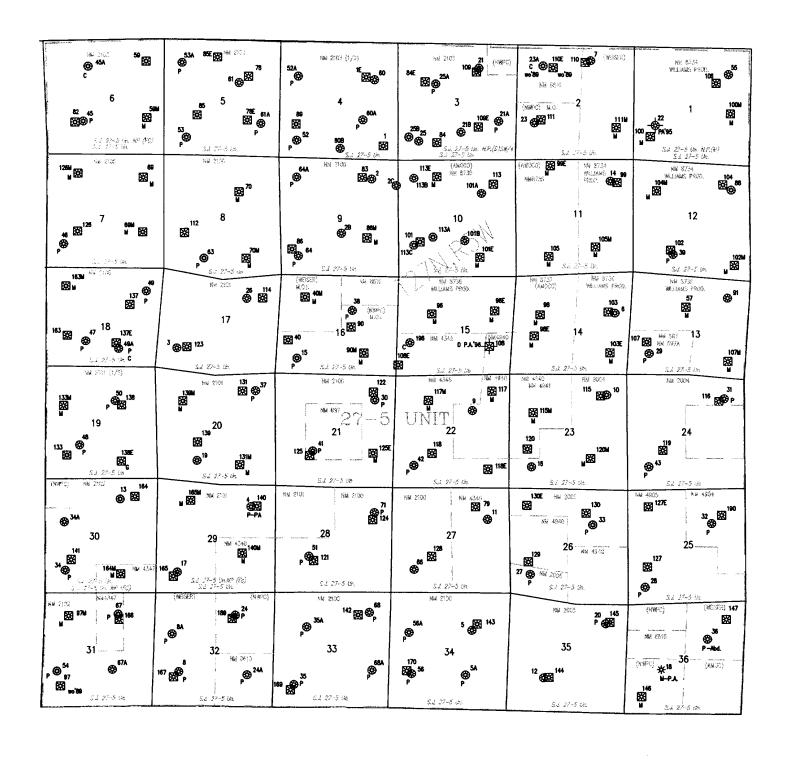


1) Burlington Resources

San Juan 27-5 Unit #118

Blanco Mesaverde / Basin Dakota

27N - 5W - 22



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.

-RIO ARRIBA

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 comminging "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, 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 commingte (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-Fruitiand Coal Gas Pool wells.
 - (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 Plemred 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 Unit: 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 Pictures 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:

- 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 sint-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 testified that various allocation methods will be unliked 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 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 unliked 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:
 - 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 nonify all innerest 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 downnoise communitings is unnecessary and is
 an excessive burden on the applicant:
- the downhole commingting of weils within the San Juan 27-5 Unix Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingting 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 commingted wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are compiled with.
- (15) Approval of the proposed "reference cases" for marginal economic criterial 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 downhold commingling of Dakota. Mesaverie. 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.

CASE NO. 11626 Order No. R-10694 Page -6-

- (2) Upon filing of Division Form No. C-107-A's for weils subsequently downhole commungled 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 downinie communities 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 communal 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 remined for the entry of such further orders 22 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