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

Form C-107-A New 3-12-96 APPROVAL PROCESS:

X Administrative ___Hearing

EXISTING WELLBORE

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

APPLICATION FOR DOWNHOLE COMMINGLING _X_ YES

^{Operator} San Juan 27-5 Unit	137 G 18	3-27N-05W	Dio Amriba
ease		tr Sec - Twp - Rge	Rio Arriba
OGRID NO. 14538 Property	Code 7454 API NO. 30-03		ng Unit Lease Types: (check 1 or more) tate (and/or) Fee
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
Top and Bottom of Pay Section (Perforations)	will be supplied upon completion		will be supplied upon completion
3. Type of production (Oil or Gas)	gas		gas
4. Method of Production (Flowing or Artificial Lift)	flowing	The same	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 733 psi (see attachment)		a. 1051 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1271 psi (see attachment)	NEGE INE	b. 3145 psi (see attachment)
6. Oil Gravity (API) or Gas BTU Content	BTU 1201	<i>™™ 2 5 1999 L</i>	BTU 1054
7. Producing or Shut-In?	shut in	DIGT 9	shut in
Production Marginal? (yes or no)	no	_ 1010 0	yes
* If Shut-In and oil/gas/water rates of last production	Date: n/a Rates:	Date:	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:	Date: Rates:	Date: n/a Rates:
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: %	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
o. If allocation formula is based up attachments with supporting data of the control of the cont	yalty interests identical in all comr g, and royalty interests been notific en written notice of the proposed o	ningled zones? ed by certified mail? downhole commingling?	_Yes _xNo _YesNo _YesNo
 Will cross-flow occur? _x_ Y production be recovered, and will 			
 Are all produced fluids from all cor Will the value of production be dec 			
I. If this well is on, or communitized Land Management has been notifie	with state or federal lands eithe	er the Commissioner of Public La	•
i. NMOCD Reference Cases for Rule			
i. ATTACHMENTS: * C-102 for each zone to * Production curve for ea * For zones with no prod * Data to support all of	be commingled showing its spacing its spacing its spacing its spacing its spacing its space. (If received its space	ng unit and acreage dedication. lot available, attach explanation.) on rates and supporting data.	
nereby certify that the informati	on above is true and complet	te to the best of my knowledg	e and belief.
GNATURE SALVALA	TITLE: Produc	ction Engineer DA	TE: 03-08-99
YPE OR PRINT NAME: Dan Voec	ks TELEPHONE N	IO.: (505) 326-9700	

District I PO Box 1980, Hobbs, NM 88241-1980

State of New Mexico Energy, Minerais & Natural Resources Department

Form C-10. Revised February 21, 199-

Instructions on back

Certificate Number

Submit to Appropriate District Office State Lease - 4 Copie:

PO Drawer DD, Artesia, NM 88211-0719 District [II] 1000 Rio Bruzos Rd., Aztec. NM 87410

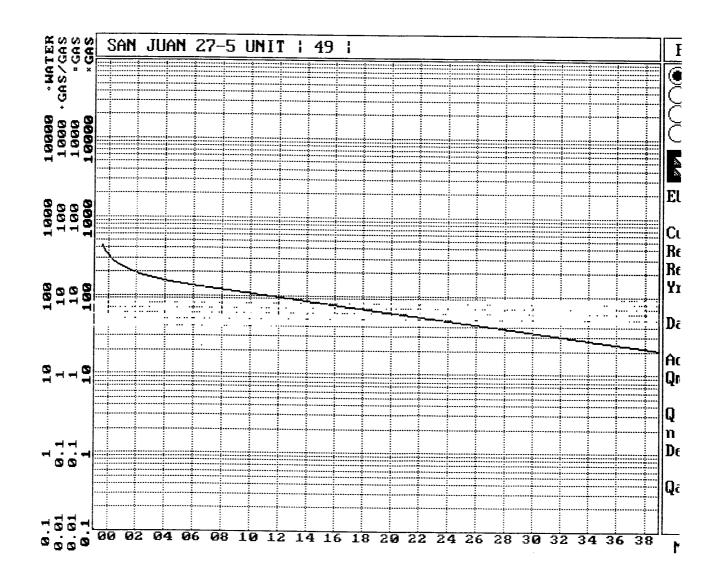
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe. NM 87504-2088

☐ AMENDED REPORT

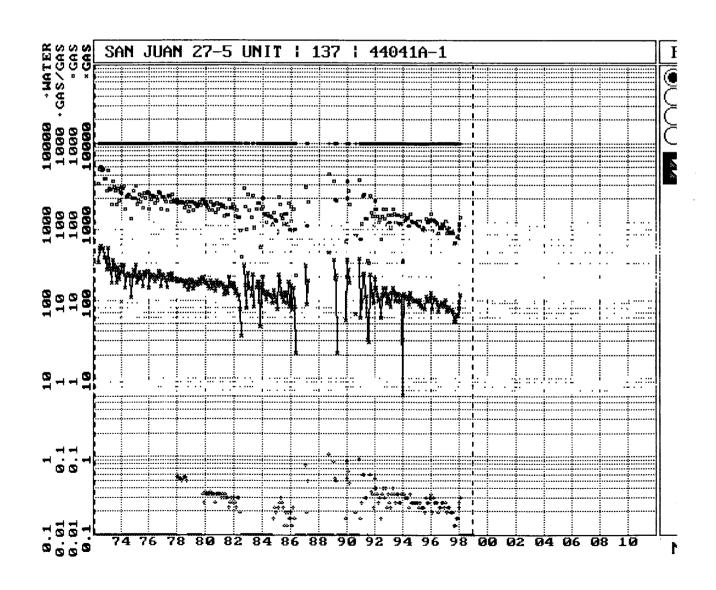
Fee Lease - 3 Copie:

District IV PO Box 2088, Santa Fe, NM 87504-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT API Number 30-039-20470 72319/71599 Blanco Mesaverde/Basin Dakota ⁴ Property Code ⁵ Property Name Well Number 7454 San Juan 27-5 Unit 137 'OGRID No. Operator Name Elevation 14538 Burlington Resources Oil & Gas Company 6534' GR ¹⁰ Surface Location UL or lot no. Section Township Range Lot Ida Feet from the North/South line Feet from the East/West line County G 18 27N 5W 1750 North 1500 East RΔ 11 Bottom Hole Location If Different From Surface UL or lot no. Section Township Lot Ide North/South line Feet from the Range Feet from the East/West line County 14 Consolidation Code MV-E/320 13 Joint or Infill 15 Order No. DK-E/320NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION 17 OPERATOR CERTIFICATION 16 I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief Original plat from David O. Vilven 1-13-72 Signature Peggy Bradfield 1500' Printed Name Regulatory Administrato: MAR 2 5 1999 Date OIL CON. DIV. 18SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat DET. 3 was plotted from field notes of actual surveys made by m or under my supervision, and that the same is true and correct to the best of my belief. Date of Survey Signature and Scal of Professional Surveyer:

San Juan 27-5 Unit #137 Expected Production Curve Mesaverde Formation



San Juan 27-5 Unit #137 Actual Production Dakota Formation



San Juan 27-5 Unit #137

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

Mesaverde	Dakota	
<u>MV-Current</u>	<u>DK-Current</u>	
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.25 %CO2 0.81 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 630 BOTTOMHOLE PRESSURE (PSIA) 732.8	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.4 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1051.0	
MV-Original	<u>DK-Original</u>	
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.25 %CO2 0.81 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1079 BOTTOMHOLE PRESSURE (PSIA)	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.18 %CO2 1.4 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3144.8	

Page No.: 1

Print Time: Tue Feb 23 12:33:14 1999
Property ID: 1486
Property Name: SAN JUAN 27-5 UNIT | 63 | 53396A-1
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

DATE	CUM_GAS		
11/07/61	0	1079.0	San Juan 27-5 Unit #137
11/13/61	15000	1078.0	
06/04/62	15000	914.0	Mesaverde Offset
04/14/63	54000		
04/29/64	108000	753.0	
05/10/65	153000	739.0	
04/19/66	195000	703.0	
05/16/67	235000	691.0	
05/02/68	265000	681.0	
10/07/70	352393	560.0	
07/22/71	377984	539.0	
06/06/72	413765	503.0	
05/02/74	478827	442.0	
09/08/89	757788	537.0	
03/18/91	777549	618.0	
07/08/91	780117	630.0	

Page No.: 1
Print Time: Tue Feb 23 12:32:59 1999
Property ID: 1359
Property Name: SAN JUAN 27-5 UNIT | 137 | 44041A-1
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

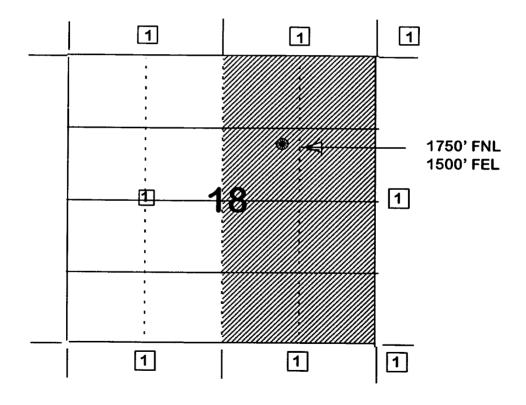
		CUM_GAS Mcf	
San Juan 27-5 Unit #137	2624.0	0	04/17/72
<u> </u>	1781.0	23771	06/22/72
Existing Dakota	1172.0	162721	08/29/73
Exioting Barrota	996.0	226775	05/02/74
	876.0	301552	05/05/75
	726.0	459902	07/05/77
	725.0	608653	11/05/79
	790.0	708517	08/12/81
	849.0	804193	09/28/83
	988.0	890080	09/05/85
	943.0	906007	12/02/85
	1156.0	947938	10/05/88
	1894.0	1000676	04/09/90
	887.0	1153942	04/05/94

BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #137 OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingled well

Township 27 North, Range 5 West

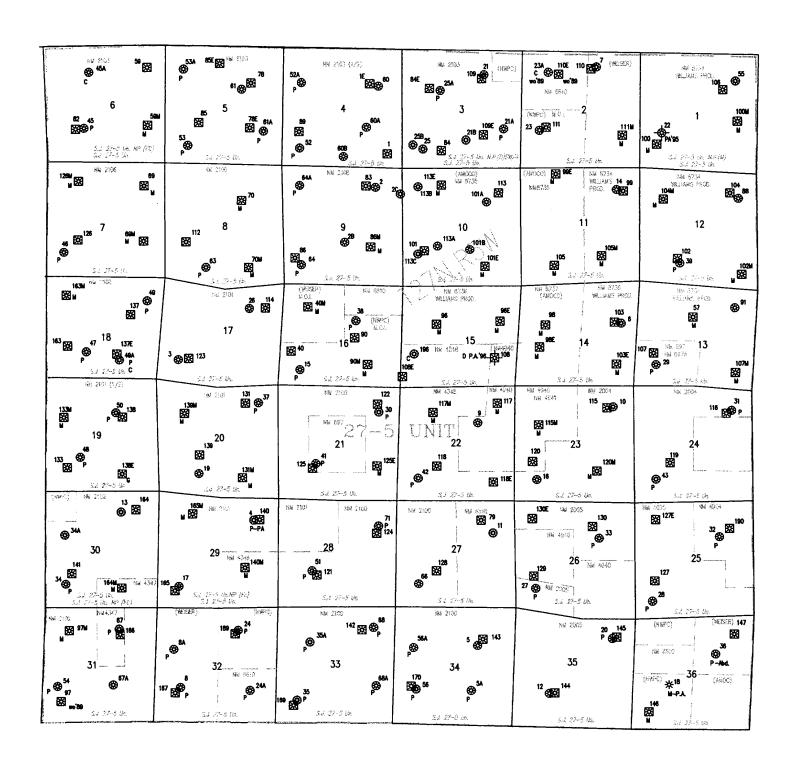


1) Burlington Resources

San Juan 27-5 Unit #137

Blanco Mesaverde / Basin Dakota

27N - 05W - 18



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.

PIO 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.

EINDS 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 downnole 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 downnole comminging 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, ere., so as to remer 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-Fruitiand Coal Gas Pool weils.
 - (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:

- 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 Units
 - 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 undereloped 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 "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:

- 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 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 unliked for downingle 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 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 ailocation methods proposed by the applicant are routinely utilized by industry and approved by the Division and therefore the proposal to except ailocation 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 unit:

- 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 weils within the San Juan 27-5 Unit 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 owners:
- 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 downnote 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 commingting 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.

- (2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole communised 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 commungle 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 Santa Fe. New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LeMA

Director