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

BURLINGTON RESOURCES OIL & GAS COMPANY

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

PO Box 4289, Farmington, NM 87499

EXISTING WELLBORE _X_ YES ___ NO

perator		Address	
an Juan 27-5 Unit	86 M	J 9-27-5	Rio Arriba
200	Well No.	Unit Ltr Sec - Twp - Rge	County Spacing Unit Lease Types: (check 1 or more)
GRID NO14538 Property C	ode7455 API !	NO30-039-22394Federal\	
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	The second secon
Pool Name and Pool Code	Blanco Mesaverde 723	neger	Basin Dakota 71599
Top and Bottom of Pay Section (Perforations)	5821' - 6696'	N MAR 2 7 12	8352' - 8558'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing	ELET C	Flowing
5. Bottomhole Pressure	(Current) a.	a.	a. (Current)
Oil Zones - Artificial Lift: Estimated Current	490 psia		760 psia
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1225 psia	b.	b. 3063 psia
6. Oil Gravity (°API) or Gas BTÜ Content	1168		1170
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	Date: Rates: •	Date: Rates:	Oate: 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: 01-31-97 Rates: 0.48 bbls/d 31 mcfd	Date: Rates:	Date: 01-31-97 Rates: 0.52 bbls/d 126 mcfd
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. Are all working, overriding, and if not, have all working, overrid Have all offset operators been I. Will cross-flow occur? _X_ production be recovered, and Z. Are all produced fluids from all Will the value of production be off. If this well is on, or communiting the management has been all S. NMOCD Reference Cases for R.	royalty interests identicing, and royalty interest given written notice of the Yes No If yes, are will the allocation formutommingled zones completereased by comminglized with, state or federnotified in writing of this ule 303(D) Exceptions:	cal in all commingled zones? Is been notified by certified manner of the proposed downhole comming a fluids compatible, will the folia be reliableXYes! patible with each other?ing?YesNo (If Yes rai lands, either the Commission applicationX_YesNo ORDER NO(S)Reference Order	ormations not be damaged, will any cross- No (If No, attach explanation) X_Yes No s, attach explanation) oner of Public Lands or the United States & der # R-10694 attached
* Production curve for * For zones with no pr * Data to support allow * Notification list of all * Notification list of wo * Any additional states	r each zone for at least of oduction history, estima sation method or formula offset operators. orking, overriding, and rements, data, or documer	ring its spacing unit and acreagone year. (If not available, attained production rates and supple a. Toyalty interests for uncommonints required to support comminate and complete to the best of the section of the se	interest cases.
	dluffTITLE	_Production Engineer	DATE03-24-97 505) 326-9700

IL CONSERVATION DIVISIC

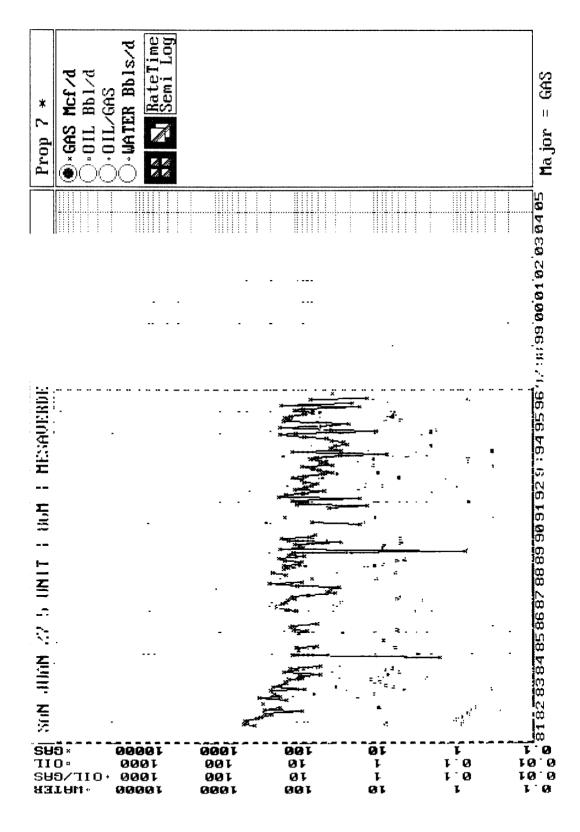
P. O. BOX 2088

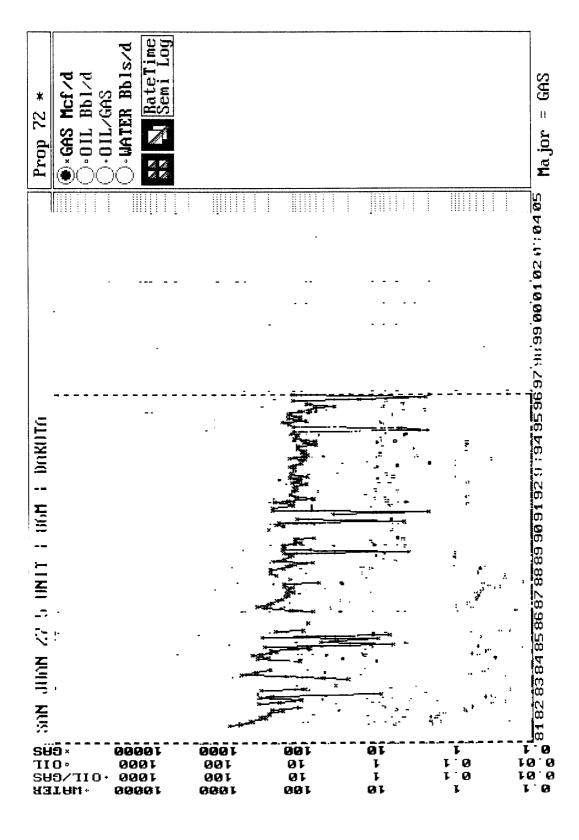
SANTA FE, NEW MEXICO 87501

Form C-107 kevised 10-1-78

All distances must be from the cuter houndaries of the Section.

Operator	 '		Lease		Well No.
EL PASO NAT	IURAL GAS COM	PANY	SAN JUAN 27-5	UNIT (SF-07939	1) 86-M
Unit Letter	Section	Township	Range County		
J	9	27N	5W	Rio Arriba	
Actual Footage Loca			2510	5	
1760 Ground Level Elev.	feet from the Producing For	South line and	_ :	t from the East	line Dedicated Acreage:
7334		ERDE - DAKOTA	DIM:YOU ME	SA VERDE DAKOTA	320.00 & 320.00 _{Acres}
	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?					
X Yes	No If an	swer is "yes," type o	consolidationur	nitization	·
	is "no," list the	owners and tract desc	riptions which have ac	tually been consolid	lated. (Use reverse side of
No allowat	ole will be assign				nmunitization, unitization,
forced-poolsion.REIS	ling, or otherwise)	3/2 DEDICATION FO	r dakota & E/2 di	EDICATION FOR M	n approved by the Commis- ESA VERDE 6/19/1980
	1	Ŋ	1	N N	CERTIFICATION
	į		! !	N I	certify that the information can-
			ev kumes	17	ny knowledge and belief.
			ECEN	Norne//	11 2.
	+		MAR 2 7 1997—	Position	B. Gusea
	 	9 01		Drill Compuny	ing Clerk
			Desco O	El Pa	so Natural Gas
	l S	ec.	[June	20, 1980
XXXXXXX					
X	1	9	!	hereb	y certify that the well-location
8	i.	SF-079391	i I	NM	n this plat was platted from field
X	i	Ŋ		15XI	f actual surveys made by me or
8	1	N	<u>1540'</u>	under m	y supervision, and that the same
Ä	i	Ŋ		1341	and correct to the best of my
8	!	Ŋ	ı	knowled	ge and belief.
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				Certification	1)10:
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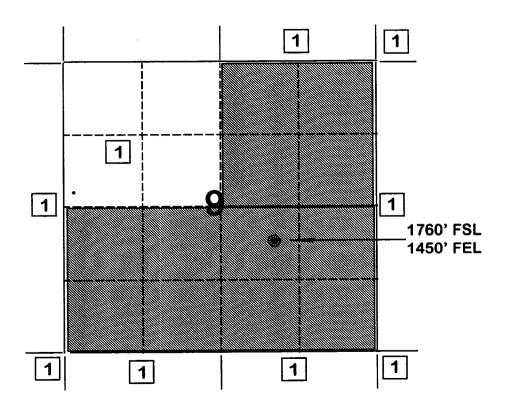


BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #86M OFFSET OPERATOR \ OWNER PLAT

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

Township 27 North, Range 5 West



1) Burlington Resources Oil and Gas Company

UAN 27-5 UNIT | 86M | 53405A-1 Mesaverde Table Name: K:\ARIES\RR97PDP\TEST.DBF

DATE	CUM_GAS		
07/29/81	0	1031.0	Original
12/17/81	36108	701.0	
11/01/82	102924	588.0	
04/24/84	170793	5 59. 0	
06/21/84	175783	568.0	
04/07/86	201681	647.0	
05/10/89	295507	631.0	
04/15/91	336890	6 80. 0	
10/15/91	338422	692.0	
05/03/93	383148	493.0	
3/25/97	463747	420.0	Estimated from P/Z data

Page No.: 1
Print Time: Wed Feb 26 07:18:18 1997
Property ID: 1742
Property Name: SAN JUAN 27-5 UNIT | 86M | 53405B-1 Dakota
Table Name: K:\ARIES\RR97PDP\TEST.DBF

DATE	CUM GAS Mcf	M_SIWHP Psi				
07/22/81	0	2435.0	Original			
12/17/81	44712	1125.0	•			
11/01/82	110582	930.0				
02/22/84	158994	1096.0				
11/06/85	242152	1096.0				
05/19/88	325176	1473.0				
04/22/90	404301	1070.0				
07/28/92	475612	1024.0				
03/12/93	500903	1143.0	· ·			
3/25/97	614687	620.0	Estimated	from P	/2	data

San Juan 27-5 Unit #86M Bottom Hole Pressures Flowing and Static BHP

Cullender and Smith Method

Version 1.0 3/13/94

Dakota		
<u>DK-Current</u>		
GAS GRAVITY 0.683 COND. OR MISC. (C/M) C %N2 0.22 %CO2 0.79 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 8455 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 198 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 620 BOTTOMHOLE PRESSURE (PSIA) 759.5		
DK-Original		
GAS GRAVITY 0.683 COND. OR MISC. (C/M) C %N2 0.22 %CO2 0.79 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 8455 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 198 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 2435 BOTTOMHOLE PRESSURE (PSIA) 3063.3		

5 6 7 8 9 10

PF6 - RETURNS TO ANNUAL DISPLAY PF3 - TRANSFER TO UPDATE PF10 - HELP INFORMATION PF9 - DISPLAY MONTHLY INJECTION 00/00/00 00:00:00:0 PRS 03/05/97

B MY JOB NUM LU #5

11 12

SAN JUAN 27-5 UNIT #86M Mesaverde/Dakota Sec. 9, T-27-N, R-5-W Rio Arriba Co., NM

53A NM 2103 P 78	NM 2103 (1/2) 52A P	NM 2103 21 (NWPC) 84E 25A
85 5 78E 61A 53 P	4 89 P 52 P S.J. 27-5 Un.	3 109E ⇔ 21A 109E ⇔ 21A P 25 84 ⇔ 5.J. 27-5 Un. N.P.ØISW/4 S.J. 27-5 Un.
NM 2106	P NM 2106 83 P 2 P	113E (AMOCO) NM 8735 113 M 101A
8 P S.J. 27-5 Un	9 86 86 P S.J. 27-5 Un.	10 13A 10 10E S.J. 27-5 Un.
NM 2101 26 114 ₩ 177	(WEISER) MOI MOI MOI MOI MOI MOI MOI MOI	NM 8736 WILLIAMS PROD. 96E 96 □ 15
3 ⊕ ⊠ 123 S.J. 27-5 Un.	₩ ⁴⁰ 108E P S.J. 27-5 Un.	C 196 NM 4348 D P.A. 96 1088 S.J. 27-5 Uh

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:
 - 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:

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- 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:

- 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.

- (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 /

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