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:

TYPE OR PRINT NAME: Dan Voecks

APPLICATION FOR DOWNHOLE COMMINGLING

Well No.

Form C-107-A

X YES ___ NO

State of New Mexico Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION

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

APPROVAL PROCESS:

X Administrative ___Hearing

County

Spacing Unit Lease Types: (check 1 or more)

EXISTING WELLBORE

Burlington Resources Oil & Gas Company		PO Box 4289, Farmington, NM 87499			
Operator		Address			
San Juan 27-5 Unit	130E	D 26-27N-05W	Rio Arriba		

Unit Ltr. - Sec - Twp - Rge

Federal State (and/or) Fee API NO. 30-039-23902 7454 OGRID NO. 14538 **Property Code** Intermediate Zone The following facts are submitted in support of downhole commingling: Upper Zone Basin Dakota - 71599 Blanco Mesaverde - 72319 1. Pool Name and Pool Code will be supplied upon completion will be supplied upon completion 2. Top and Bottom of Pay Section (Perforations) gas gas 3. Type of production (Oil or Gas) flowing 4. Method of Production (Flowing or Artificial Lift) flowing (Current) a. 705 psi (see attachment) a. 833 psi (see attachment) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current MAR 2 5 1999 Gas & Oil - Flowing: Measured Current (Original) b. 1230 psi (see attachment) b. 2412 psi (see attachment) All Gas Zones: Estimated or Measured Original BTU 1176 Oil Gravity (API) or Gas BTU Content BTU 1212 DIGIG 3 shut in shut in 7. Producing or Shut-In? yes Production Marginal? (yes or no) If Shut-In and oil/gas/water rates of last production Date: Date: n/a Date: n/a Rates: Rates: Note: For new zones with no production history, applicant shall be required to attach production astimates and supporting data Date: n/a If Producing, give data and oil/gas/water water of recent test (within 60 days) Date: Date: n/a Rates: Rates: Oil: Gas: 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: Gas: 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. 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 _ __ Yes _X_ No (If Yes, attach explanation) 13. Will the value of production be decreased by commingling? 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_ MENTS:

* 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. 16. ATTACHMENTS

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

PO Box 2088, Santa Fe, NM 87504-2088

District IV

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-10 Revised February 21, 199 Instructions on bac

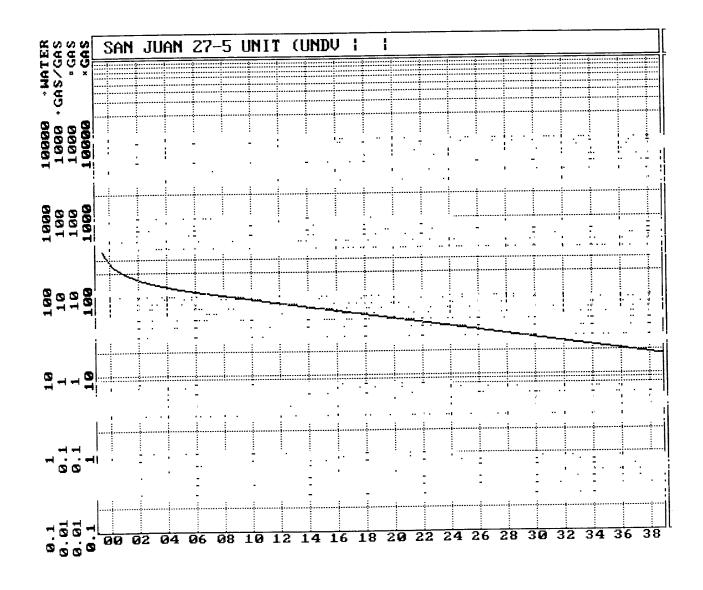
Submit to Appropriate District Offic

State Lease - 4 Copic Fee Lease - 3 Copic

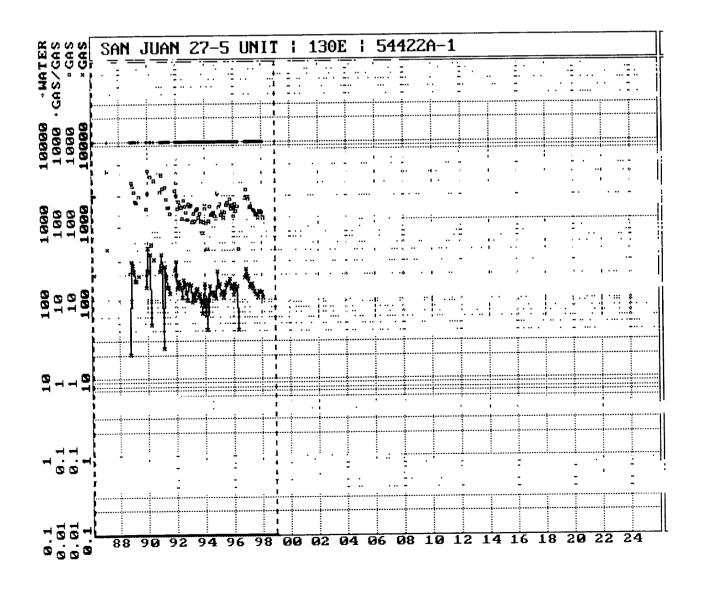
AMENDED REPOR

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' A	Pl Numbe											
30-039-2	23902		72319/71599 Blanco Mesaverde/Basin Dakota									
¹ Property (Code		' Property Name ' Well Numb									
7454			San Juan 27-5 Unit 130E									
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San Juan 27-5 Unit #130E Expected Production Curve Mesaverde Formation



San Juan 27-5 Unit #130E Actual Production Existing Dakota



San Juan 27-5 Unit #130E

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 COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) GOT TO 0.71 0.71 C 0.75 60 60 60 60 60 607	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.12 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 833.1					
MV-Original	DK-Original					
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Page No.: 1

Print Time: Thu Feb 18 08:26:07 1999

Property ID: 1324

Property Name: SAN JUAN 27-5 UNIT | 11 | 49622A-1 Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

DATE	CUM_GAS Mcf	M SIWHP	
11/09/55	0	1046.0	San Jua
11/14/55	0	1045.0	
07/30/57	57000	694.0	Mesaver
11/06/58	98000	614.0	
09/22/59	123000	618.0	
10/06/60	147000	621.0	
05/28/61	166000	619.0	
08/06/62	201000	631.0	
06/14/63	222000	634.0	
05/07/64	245000	630.0	
10/25/65	280000	594.0	
04/19/66	293000	612.0	
08/04/67	328000	555.0	
05/02/68	347000	567.0	
08/28/70	399857	516.0	
07/06/71	415448	524.0	
08/09/72	434700	482.0	
02/17/82	586334	491.0	
04/18/86	630655	543.0	
09/08/89	662245	557.0	
06/03/91	677818		
06/14/91	677818	607.0	

San Juan 27-5 Unit #130E

Mesaverde Offset

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Page No.: 1
   Print Time: Thu Feb 18 08:25:53 1999
  Property ID: 1355
Property Name: SAN JUAN 27-5 UNIT | 130E | 54422A-1
  Table Name: O:\PUBLIC\GENTITY\GDPNOS\TEST.DBF
--DATE-- ---CUM GAS-- M SIWHP
Mcf.....Psi
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                    1949.0
                                    San Juan 27-5 Unit #130E
05/05/86
               6090 1252.0
11/03/87
              19011 797.0
                                    Existing Dakota
10/11/88
         23056 887.0
06/29/90
        109018 817.0
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209328 718.0

286733 690.0

07/02/92

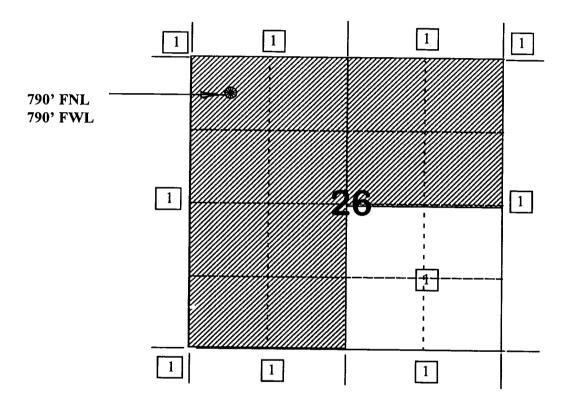
06/17/94

BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #130E

OFFSET OPERATOR/OWNER PLAT Mesaverde (W/2) / Dakota (N/2) Formations Commingle Well

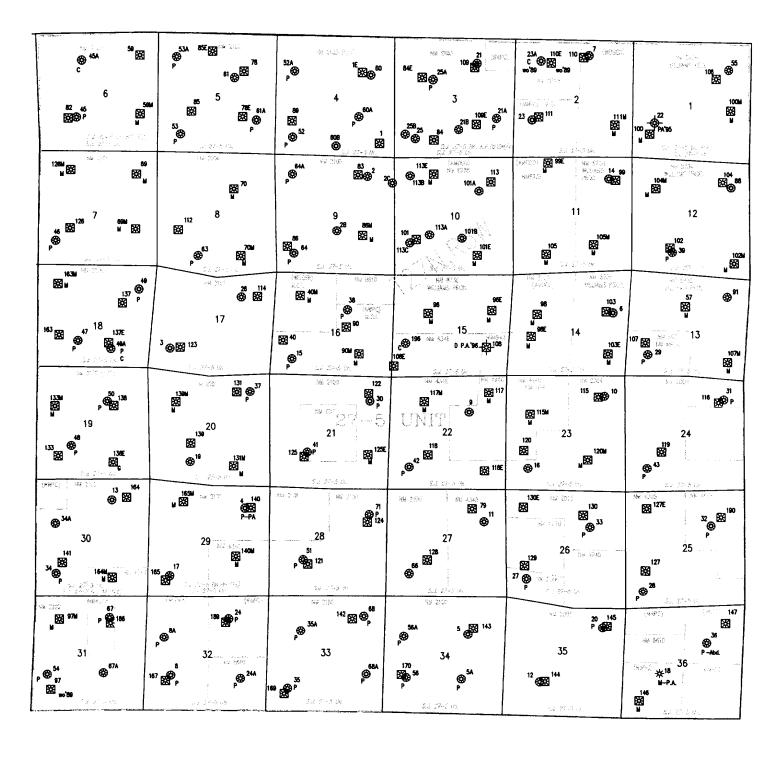
Township 27 North, Range 5 West



1) Burlington Resources

San Juan 27-5 Unit #130E 27N - 5W - 26

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.

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.

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 enteria. (b) pressure criteria. (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole comminging of Dakota. Mesaverde, 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.
- (3) Division Rule No. 303.E., amended by Order No. R-10470-A. currently states:

"If surficient 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 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, Eurlington seeks to:
 - establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations wherevery 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 unities the data presented in the immediate case to endorse or approve cerain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a cerain 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 Units
 - a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent:
 - b) the average recoverable Dakota and Picmred 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 teatmony 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 pst and 441 pst. 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 unitzed 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 unilized 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 obscined.
 - (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 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 downnoise 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 commingled 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 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 downtools comminging approvals within the San Juan 27-5 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Eurlington 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 comminging 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.

- 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 "marginai", 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 subminal of additional supporting data.
- In order to obtain Division authorization to downhole communitie wells within the San Juan 27-5 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Aziec Offices of the Division. Such application shall comain 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.
- Jurisdiction of this cause is remined 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