<u>DISTRICT I</u>

P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107-A New 3-12-96

OIL CONSERVATION DIVISION

DISTRICT II 811 South First St., Artesia, NM 88210-2835

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

APPROVAL PROCESS: _X_ Administrative ___Hearing

DISTRICT III

EXISTING WELLBORE

1000 Rio Brazos Rd, Aztec, NM 87410-1693

Burlington Resources Oil & Gas Company

APPLICATION FOR DOWNHOLE COMMINGLING

PO Box 4289, Farmington, NM 87499

__ YES __x_ NO

Operator	Addre	55					
San Juan 27-5 Unit	79M D 27-27N-05W Rio Arriba						
Lease	Well No. Unit Lt	Sec - Twp - Rge County					
			g Unit Lease Types: (check 1 or more)				
OGRID NO14538 Property Code6784 API NO30-XXX Federalx , State, (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	and the second s	Will be supplied upon completion				
3. Type of production (Oil or Gas)	gas		gas				
Method of Production (Flowing or Artificial Lift)	flowing	DEGENARI	flowing				
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 704 psi (see attachment)	a. JAN 2 5 1399	a. 856 psi (see attachment)				
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1228 psi (see attachment)	P. OIL COLD BY	b. 3094 psi (see attachment)				
6. Oil Gravity (API) or Gas BTU Content	BTU 1208	Tentings 2.	BTU 1114				
7. Producing or Shut-In?	shut in		shut in				
Production Marginal? (yes or no)	no		yes				
If Shut-In and oil/gas/water rates of last production	Date: n/a Rates:	Date: Rates:	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: % will be supplied upon completion	Oil: Gas: %	Oil: Gas: % will be supplied upon completion				
If allocation formula is based up attachments with supporting data.		t or past production, or is based oviding rate projections or other re					
10. Are all working, overriding, and royalty interests identical in all commingled zones? If not, have all working, overriding, and royalty interests been notified by certified mail? Have all offset operators been given written notice of the proposed downhole commingling? X_YesNo							
11. 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 reliablex_ YesNo (If No, attach explanation)							
12. Are all produced fluids from all co	mmingled zones compatible with e	each other?x_Yes No	•				
13. Will the value of production be decreased by commingling? Yes _X_ No (If Yes, attach explanation)							
 If this well is on, or communitize Land Management has been notifi 	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 applicationX_Yes No						
15. NMOCD Reference Cases for Rule	303(D) Exceptions: ORDER NO(S)Reference OrderR-1069	4 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: San Hold	TITLE: Prod	uction Engineer DATE: 1-	25-99				
TYPE OR PRINT NAME: Dan Voecks TELEPHONE NO.: (505) 326-9700							

District I PO 80x 1980, Hobbs, NY 88241-1980 State of New Mexico

Energy, Minerals & Natural Resources Department

Form C-7 Revised February 21, 19 Instructions on b.

District II PO Drawer OD, Antesia NM 88211-0719

District III 1000 Rio Brazos Ad. Aztec, NM 87410 Submit to Appropriate District Off State Lease - 4 Cop

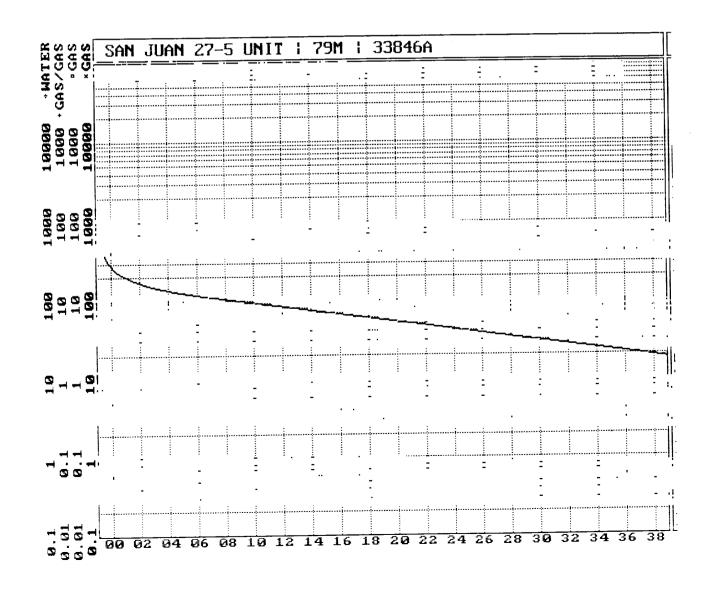
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe. NM 87504-2088 State Lease - 4 Cop Fee Lease - 3 Cop

District IV PO Box 2088, Santa Fe. NM 87504-2088 AMENDED REPOR

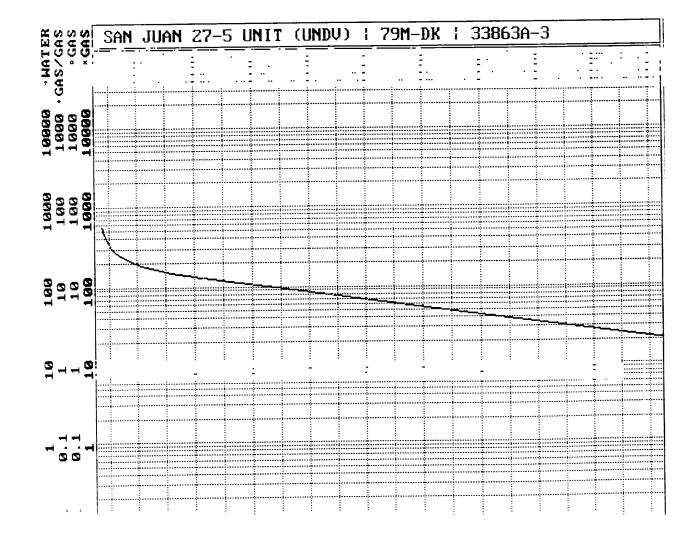
WELL LOCATION AND ACREAGE DEDICATION PLAT Pool Name Pool Code 'API Number 30-039-72319/71599 Blanco Mesaverde/Basin Dakota Well Number Property Name Property Code 79M SAN JUAN 27-5 UNIT 7454 Elevation OGRID No. *Operator Name 6470' BURLINGTON RESOURCES OIL & GAS COMPANY 14538 10 Surface Location County East/West line Feet from the Feet from the North/South line UL or lot no. Section Lot Idn RIO 790 WEST NORTH 27N 5W 1010 27 \Box ARRIB From Surface 11 Bottom Hole Location If Different Feet from the Fast/Mest line County North/South 1108 UL or lot no. Section Joint or Infill 14 Consolidation Code 15 Order No. MV-W/300.51 DK-N/284.64 NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATE OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION " OPERATOR CERTIFICATIO 5271.421 I hereby certify that the information contained herein true and complete to the best of my knowledge and be: <u>ō</u> 3 2 1 4 NMSF-079403 790 96 Signature 2280 NMSF-079394 Peggy Bradfield Printed Name Regulatory Administrat 8 7 5 6 Title Date "SURVEYOR CERTIFICATION I hereby certify that the well location shown on this was plotted from field notes of actual surveys made to or under my supervision, and that the same is true an connect to the best of my belief. 9 10 JULY 28. 1998 NMSP-379394 Date of Survey 2573 12 11

5412.66

San Juan 27-5 Unit #79M Expected Production Curve Mesaverde Formation



San Juan 27-5 Unit #79M Expected Production Curve Dakota Formation



San Juan 27-5 Unit #79M

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

Mesaverde	Dakota		
MV-Current	<u>DK-Current</u>		
AS GRAVITY OND. OR MISC. (C/M) (N2 CO2 GRAVES GRAVITY OND. OR MISC. (C/M) (N2 CO2 CO2 CO3 CO3 CO3 CO3 CO4 CO4 CO5	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA)	0.652 C 0.14 1.19 0 1.5 7660 60 198 0 718	
MV-Original	DK-Original		
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) 1028.0	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA)	0.68 0.1. 1. 76 1 28 309	

Page No.: 1

Print Time: Tue Jan 19 14:25:25 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	M SIWHP
11/09/55	0	1046.0
11/14/55	0	1045.0
07/30/57	57000	694.0
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	
05/02/68	347000	
08/28/70	399857	
07/06/71	415448	
08/09/72	434700	
02/17/82	586334	
04/18/86	630655	
09/08/89	662245	
06/03/91		
06/14/91	677818	607.0

San Juan 27-5 Unit #79M

Mesaverde Offset

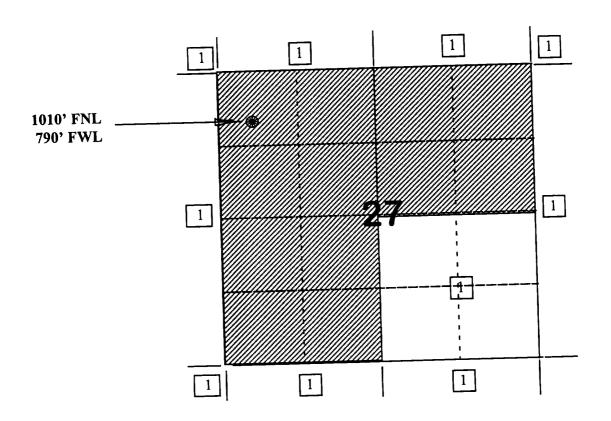
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Page No.: 1
  Print Time: Tue Jan 19 14:23:47 1999
  Property ID: 1512
Property Name: SAN JUAN 27-5 UNIT | 79 | 52398A-1
   Table Name: O:\PUBLIC\GENTITY\GDPNOS\TEST.DBF
--DATE-- ---CUM GAS-- M SIWHP
  Mcf.....Psi
                                           San Juan 27-5 Unit #79M
                       2548.0
05/18/71
                92625
                       1419.0
11/03/71
                                           Dakota Offset
               186931
                      1180.0
08/09/72
                      1279.0
               247050
05/16/73
                        800.0
               440118
06/24/75
                      850.0
               595484
08/08/77
                        754.0
               706355
05/02/79
                      666.0
06/04/81
               794228
                         820.0
09/21/83
               886098
                         860.0
05/20/85
               955495
                         842.0
11/10/88
              1099800
                         742.0
              1164679
04/22/90
                         718.0
               1231722
07/02/92
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #79M

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 #79M Blanco Mesaverde / Basin Dakota 27N - 5W - 27

69 45A C	SSA 855 833 185 835 185 855 855 855 855 855 855 855 855 85	52A 16 28@ 50	84€ 25A 108 27	23A 110E 110 2007 C S S S 200 200	S 200 € 50 € 50 € 50 € 50 € 50 € 50 € 50
6 82 45 83889P	55 5 78K 51A 51B 52 5 5 78K 51A 51B 52 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	** *** **** **** ***** ***** ***** *****	3 100 8 8 100 8 9 10 100 8 10 100 8 10 100 8 10 100 8 10 100 8 10 100 8 10 100 10		1 100M 1 22 M 100 M PA'95
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163M 137 137 163 3 47 18 1376 163 3 49 40A	\$ 25 114 P	16 23 90 16 23 90	98 28 28 15 15 c 28 196 D PA 96 23 106 100£	98 103 6 33 33 5 M 98E 14 U 103E 13 M 103E	107 83 1074 83 1074 83 1074 83 1074 83 1074 83 1074
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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

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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 h jurisdiction of this cause and the subject matter thereof.
- pursuant to the provisions of Division Rule 303.E., seeks to establish a downing comminging "reference case" to provide exceptions for (a) marginal economic criter (b) pressure criteria. (c) allocation formulas and (d) modification of notification rules a unit-wide basis for downhole commingling of Dakota. Mesaverde. Fruitland Coal a Pictured Cliffs gas production within existing or future drilled wells within the San Ju 27-5 Unit. San Juan County, New Mexico.
 - (3) Division Rule No. 303.E., amended by Order No. R-10470-A, currer 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-Mesaverd: 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 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 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:
 - 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 proper classified as "marginal".
 - (9) In support of its request to except pressure criteria within the Dakota a: Pictured Cliffs formations within the San Juan 27-5 Unit, the applicant present 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 shur-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:
 - 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 industry and approved by the Division and therefore the proposal to except allocat formulas should be approved.
 - (13) In support of its request to establish a "reference case" or administrate procedure for providing notice within the San Juan 27-5 Unit the applicant present evidence and testimony which indicates that:
 - a) 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 downhole 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 Z. Unit for obtaining approval for subsequent downhole commingled wells without notice. Unit interest owners, provided however that, all other provisions contained with Division Rule No. 303.C. are complied with.
- pressure criteria, allocation formulas and notice will lessen the burden on the applic insofar as providing the data required pursuant to Division Rule No. 303.D. and Form 107-A, will provide the applicant a streamlined method for obtaining downs comminging approvals within the San Juan 27-5 Unit, and will not violate correlaringhts.

IT IS THEREFORE ORDERED THAT:

(1) The application of Buriington Resources Oil & Gas Company to estate a "reference case" for (a) marginal economic criteria. (b) pressure criteria. (c) allocation and (d) modification of notification rules on a unit-wide basis for down commingling of Dakota. Mesaverde. Fruitland Coal and Pictured Cliffs gas production existing or future drilled wells within the San Juan 27-5 Unit. San Juan Co. New Mexico, is hereby approved.

- 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 "marginai", 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 at 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