DISTRIC[]
*** N. French Dr., Hobbs, N/4 88240 DISTRIC [II 811 South First St., Artesia, Ni4 88210 B11 South First Sa.,
DISTRIC III
1000 Ric Brizos Rd, Aztec, NM 87410 DISTRIC [IV 2040 5. Pac reco, Santa Fe, Ni4 87505

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 vised August 1999 APPROVAL PROCESS: Administrative ___Hearing **EXISTING WELLBORE**

___ YES __X_ NO

Revis

APPLICATION FOR DOWNHOLE COMMINGLING

PO BOX 4289, FARMINGTON, NM 87499 **BURLINGTON RESOURCES OIL & GAS COMPANY** Address **RIO ARRIBA** SAN JUAN 27-5 IJNIT 82M E 06-27N-05W Unit Ltr. - Sec - Twp - Rge 26210 Spacing Unit Lease Types: (check 1 or more) Federal __X__, State _ _, (and/or) Fee API NO.__30-039-XXXXX_ Property Code OGRID NO._ 7454 14538 The following facts are submitted in support of downhole commingling: Intermediate Zone BASIN DAKOTA - 71599 **BLANCO MESAVERDE - 72319** 1. Pool Name and Pool Code WILL BE SUPPLIED UPON COMPLETION 2. Top and Bottom of Pay Section (Perforations) WILL BE SUPPLIED UPON COMPLETION GAS GAS 3. Type of production (Oil or Gas) **FLOWING** 4. Method of Production (Flowing or Artificial Lift) **FLOWING** a. (Current) a. (Current) 5. Bot:omhole Pressure Oil Zones - Artificial Lift:
Estimated Current 762 psi (see attachment) 560 psi (see attachment) Gas & Oil - Flowing //leasured Current b. ^(Oriiginal) b. (Oriiginal) 0) All Gas Zones: Estimated Or Measured Original 2101 psi (see attachment) 913 psi (see attachment) BTU 1122 6. Oil Gravity (EAP!) or Gas BTU Content RTI 1202 SHUT-IN SHUT-IN 7. Producing or Shut-In? YFS Procuction Marginal? (yes or no) Date: N/A Date: N/A Rates: Rates: If Shut-In, give date and oil/gas/ water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimate; and supporting data Date: N/A Date: N/A Date: N/A If Producing, give date andoil/gas/ water rates of recent test (within 60 days) Rates: Rates: Oil: Fixed Percentage Allocation
 Formula -% for each zone
 (total of %'s to equal 100%) WILL BE SUPPLIED UPON COMPLETION WILL BE SUPPLIED UPON COMPLETION WILL BE SUPPLIED UPON COMPLETION 9. 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. 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? __Yes _X_No _Yes __X_No Nill 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) 11. Will cross-flow occur? 12. Are all produced fluids from all commingled zones compatible with each other? _X_ Yes ___ No 13. Will the value of production be decreased by commingling? (If Yes, attach explanation) _ Yes __X No 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). R-10694 16. ATTACHMENTS: * C-:.02 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 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. TITLE PRODUCTION ENGINEER DATE: 12/10/99 SIGNATURE orregan

TELEPHONE NO. 505-326-9700

TYPE OR PRINT NAME SEAN E. CORRIGAN

DISTRICT 1 P.O. Box 1980, Hobbis, N.M. 88241-1980

State of New Mexico Energy, Minerals & Natural Resources Department

Form C-102 Revised February 21, 1994 Instructions on back

DISTRIC" II P.O. Drower DD, Artesia, N.M. 88211-0719

Submit to Appropriate District Office State Lease - 4 Copie: Fee Lease - 3 Copie:

DISTRIC: III 1000 Rio Brazos Rd., Aztec, N.M. 87410

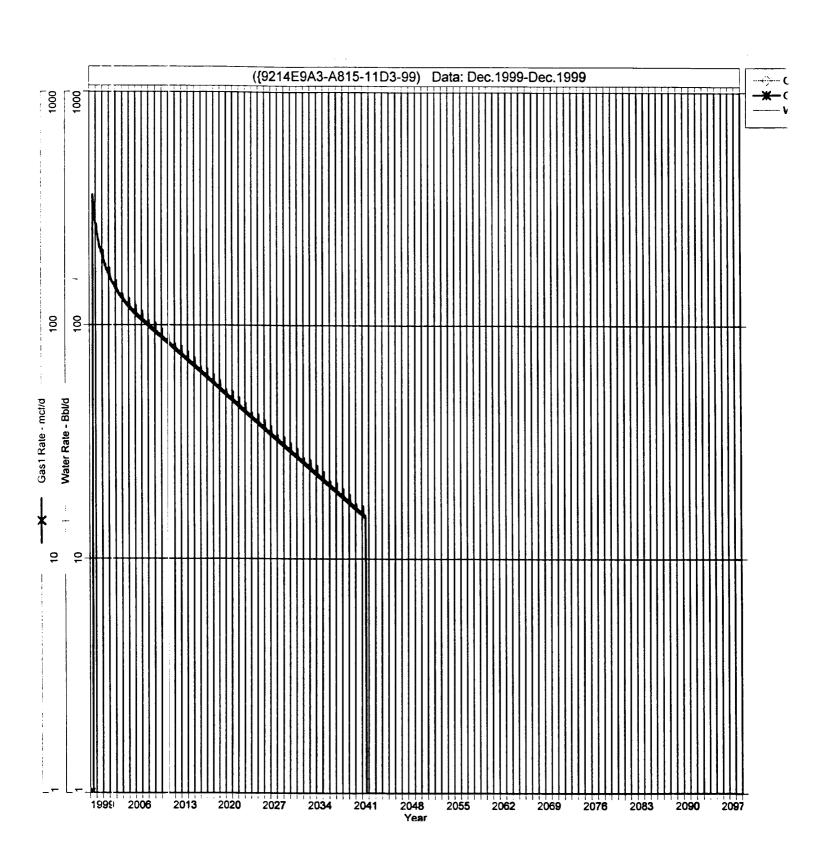
OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, NM 87504-2088

☐ AMENDED REPORT

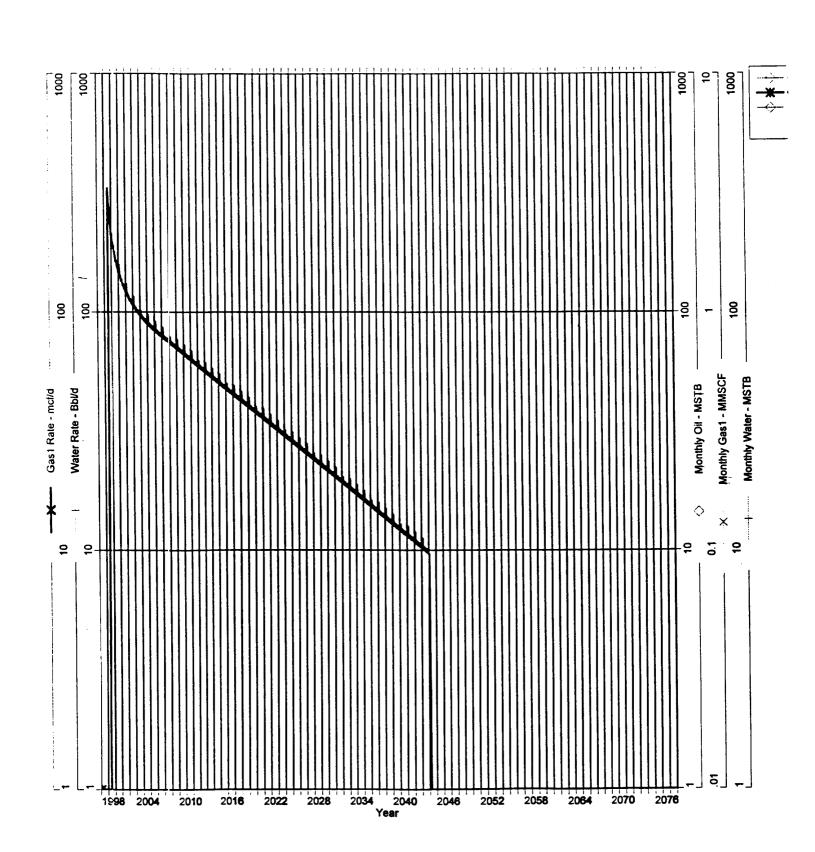
DISTRICT IV PO Box 2088, Santa Fe, NM 87504-2088

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30-039- 72319			9//13	/71599 Blanco Mesaverde/Basin Dakota *Property Name *Well Number					ll Number	
Property Code				SAN JUAN 27-			82 M			
OCRID No.	OGRID No.				*Operator Name				* Elevation	
14538		BURLING			NGTON RESOURCES OIL & GAS COMPANY			6508'		
¹⁰ Surface Location										
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/Wes		County RIO ARRIBA
Ε	6	27-N	5-W	<u></u>	1770	NORTH	860	WES	<u> </u>	RIO ARRIBA
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UL or lot no.	Section	- Township	Range	Lot ldn	Feet from the	North/South line	reet Hom die	Last, we		County
Dedicated Acres) p	loint or Infi	n	M Consolidation	Code	P Order No.			
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San Juan 27-5 Unit #82M
Expected Production
Mesaverde Formation



San Juan 27-5 Unit #82M
Expected Production
Dakota Formation



San Juan 27-5 Unit #82M

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>
GAS GRAVITY 0.694 COND. OR MISC. (C/M) C %N2 0.19 %CO2 1.05 %H2S 0 DIAMETEF: (IN) 1.5 DEPTH (FT) 5895 SURFACE TEMPERAT JRE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 137 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 482 BOTTOMHOLE PRESSURE (PSIA) 560.0	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.34 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 0.647 C C C C C D.17 60 198 FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 640
MV-Original	DK-Original
GAS GRA /ITY COND. OF: 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) BOTTOMHOLE PRESSURE (PSIA) 912.5	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.34 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 0.647 C 0.6

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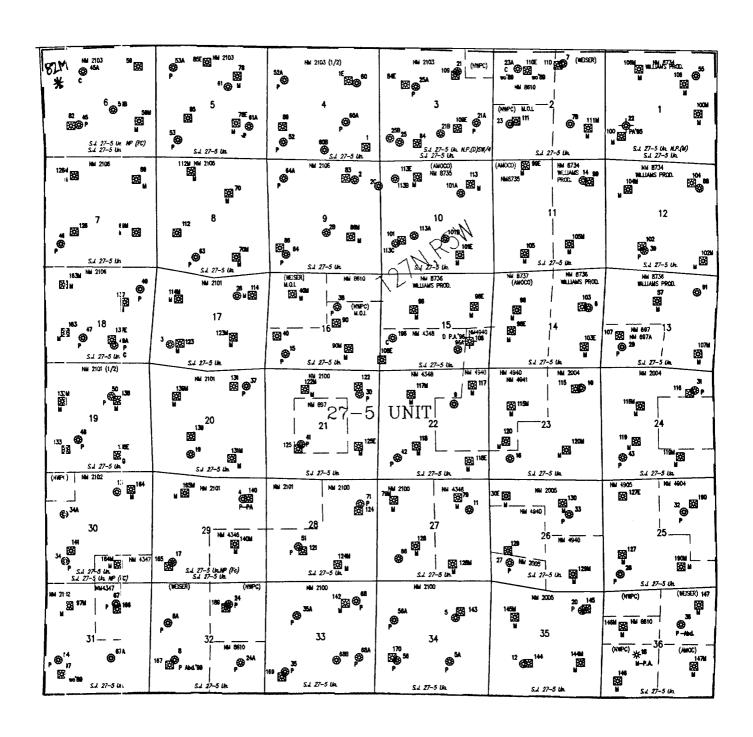
Property ID: 1477
Property Name: SAN JUAN 27-5 UNIT | 59M | 53392B
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

DATE	C'JM_GAS Mcf		
08/13/81	0	779.0	<u>San Juan 27-5 Unit #82M</u>
02/23/82	39449	530.0	Mesaverde Offset
06/04/82	77090	475.0	
09/19/83	16799 2	447.0	
05/03/84	19986 8	431.0	
10/20/86	311845	446.0	
06/27/89	429118	509.0	
03/18/91	469329	502.0	
09/17/91	484093	514.0	
05/31/93	545837	482.0	

Page No.: 1
Print Time: Wed Dec 01 13:19:13 1999
Property ID: 1476
Property Name: SAN JUAN 27-5 UNIT | 59M | 53392A
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

DATE	CUM_GAS	M SIWHP	
08/06/81	0	1731.0	San Juan 27-5 Unit #82M
02/23/82	33568	1246.0	D 1 4 08 4
06/04/82	70941	974.0	Dakota Offset
09/19/83	174401	546.0	
11/18/85	303914	739.0	
07/07/83	411865	702.0	
04/24/90	490129	460.0	
06/23/93	59903 6	640.0	

San Juan 27-5 Unit #82M Mesaverde / Dakota 27N – 5W – 06



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.

- MYIO ARIRIBA

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. Messaverde. 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 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-Messaverde 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:

- establish a "reference case" whereby the Division unities the data presented in the immediate case to endorse or approve carain 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 Unix 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 Dakora 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;
 - 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 Plentred Cliffs formations within the San Juan 27-5 Unit. the applicant presented engineering evidence and testimony which indicates that:

- a) 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.
- the average current shut-in bottomnole 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 restricted that various allocation methods will be unitzed for downhale 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 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 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:
 - 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. 103.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 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 owner:
- e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for posice.
- (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 downnoise committeing approvals within the San Juan 27-5 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Buriington 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 commungiting of Dakota. Mesaverde. Fruitiand Coal and Pictured Cliffs gas production within existing or future dirilled 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 communicate 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 Dakou 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 communate 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 motice to all interest owners within the San Juan 27-5 Unit of such proposed comminging.
 - Jurisdiction of this cause is retained for the entry of such further orders 25 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