

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**2040 S. Pacheco
Santa Fe, New Mexico 87505-6429Form C-107-A
New 3-12-96**APPROVAL PROCESS :**☒ Administrative
☐ Hearing**APPLICATION FOR DOWNHOLE COMMINGLING****EXISTING WELLBORE**☒ YES ☐ NO**Burlington Resources Oil and Gas****PO Box 4289, Farmington, NM 87499**

Operator

San Juan 28-5 Unit**#35**

Address

M 19-28N-05W**Rio Arriba**

Lease

Well No.

Unit Ltr. - Sec - Twp - Rge

County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7460API NO. 30-039- 07356Federal ☒ , State ☐ , Fee ☐

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	5138'-5730'		7605'-7804'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Current) a. 458 psi (see attachment) (Original) b. 1282 psi (see attachment)	RECEIVED JUL 7 1998 OIL CONSERV. DIV.	a. 625 psi (see attachment) b. 2521 psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1204		BTU 1045
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: N/A Rates:		Date: N/A Rates:

Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data

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OIL CONSERVATION DIVISION

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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 Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: N/A Rates:		Date: N/A Rates:
* If Producing, give data and oil/gas/water of recent test (within 60 days)	Date: 6/17/98 Rates: 69 mcf/d 0.3 bopd		Date: 6/17/98 Rates: 52 mcf/d 0.0 bopd
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	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? ☐ Yes ☒ No
If not, have all working, overriding, and royalty interests been notified by certified mail? ☐ Yes ☒ No
Have all offset operators been given written notice of the proposed downhole commingling? ☒ Yes ☐ No11. Will cross-flow occur? ☒ 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. ☒ Yes ☐ No (If No, attach explanation)12. Are all produced fluids from all commingled zones compatible with each other? ☒ Yes ☐ No13. Will the value of production be decreased by commingling? ☐ Yes ☒ No (If Yes, attach explanation)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. ☒ Yes ☐ No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10695 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

TITLE Production Engineer DATE 6/23/98

TYPE OR PRINT NAME

L. Tom Loveland

TELEPHONE NO. (505)

326-9700

Well Location and Acreage Dedication Plat

Section A.

Date FEBRUARY 26, 1959

Operator PACIFIC NORTHWEST PIPELINE CORPORATION Lease SAN JUAN 28-5 UNIT SF 080505-B
 Well No. 35(MD) Unit Letter M Section 19 Township 28-N Range 5-W NMPM
 Located 990 Feet From SOUTH Line, 990 Feet From WEST Line
 County RIO ARriba G. L. Elevation 6560 Dedicated Acreage 320 & 320 Acres
 Name of Producing Formation MESA VERDE & DAKOTA Pool BLANCO MESA VERDE, WILDCAT DAKOTA

1. Is the Operator the only owner in the dedicated acreage outlined on the plat below?
 Yes _____ No X
2. If the answer to question one is "no", have the interests of all the owners been consolidated by communitization agreement or otherwise? Yes X No _____. If answer is "yes", Type of Consolidation, _____

Unit Agreement.

3. If the answer to question two is "no", list all the owners and their respective interests below:

Owner

Land Description

RECEIVED
JUL 7 1959OIL CON. DIV.
DIST. 3

Section B.

Note: All distances must be from outer boundaries of section.

This is to certify that the information in Section A above is true and complete to the best of my knowledge and belief.

El Paso Natural Gas Company

(Operator)

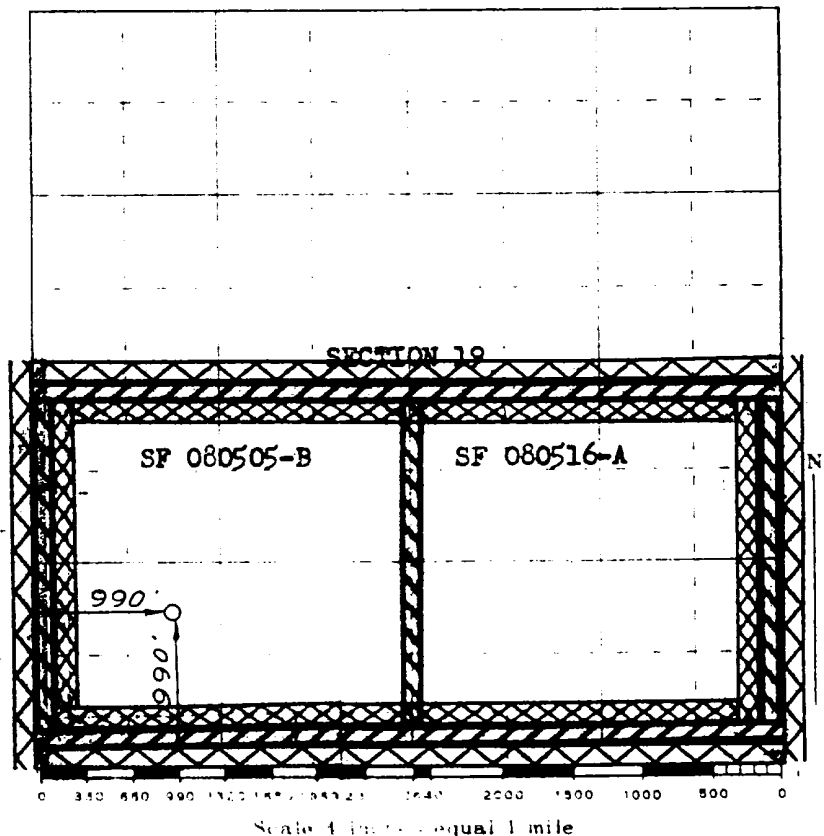
ORIGINAL SIGNED H.E. McANALLY

(Representative)

Box 997

(Address)

Farmington, New Mexico



NOTE: THIS PLAT IS RE-ISSUED TO SHOW MOVED LOCATION. 3 2 59

NOTE: THIS PLAT IS RE-ISSUED TO SHOW MOVED LOCATION AND DAKOTA DEDICATION. 8 27 59

NOTE: THIS PLAT IS RE-ISSUED TO SHOW MOVED LOCATION. 10 23 59

This is to certify that the above plat was made by me or under my supervision and to the best of my knowledge and belief.

from field notes of actual surveys and are true and correct to the best of my knowledge and belief.

(Seal)

Farmington, New Mexico

Date Surveyed NOVEMBER 26, 1958

David J. Kilmer
 Registered Professional Engineer and/or Land Surveyor

SAN JUAN 28-5 UNIT : 35 : MESAVERDE

Prop 163 *

* OIL
* WATER/GAS
* GAS
* WATER

— DAILY RATE
— TBG PRESSURE

○ * WATER Bbls/d
● * GAS Mcf/d
○ * WATER/GAS
○ * OIL Bbl/d

RateTime
Semi Log

100
10
1000
1000

10
1
100
100

1
0.1
10
10

0.01
1
10

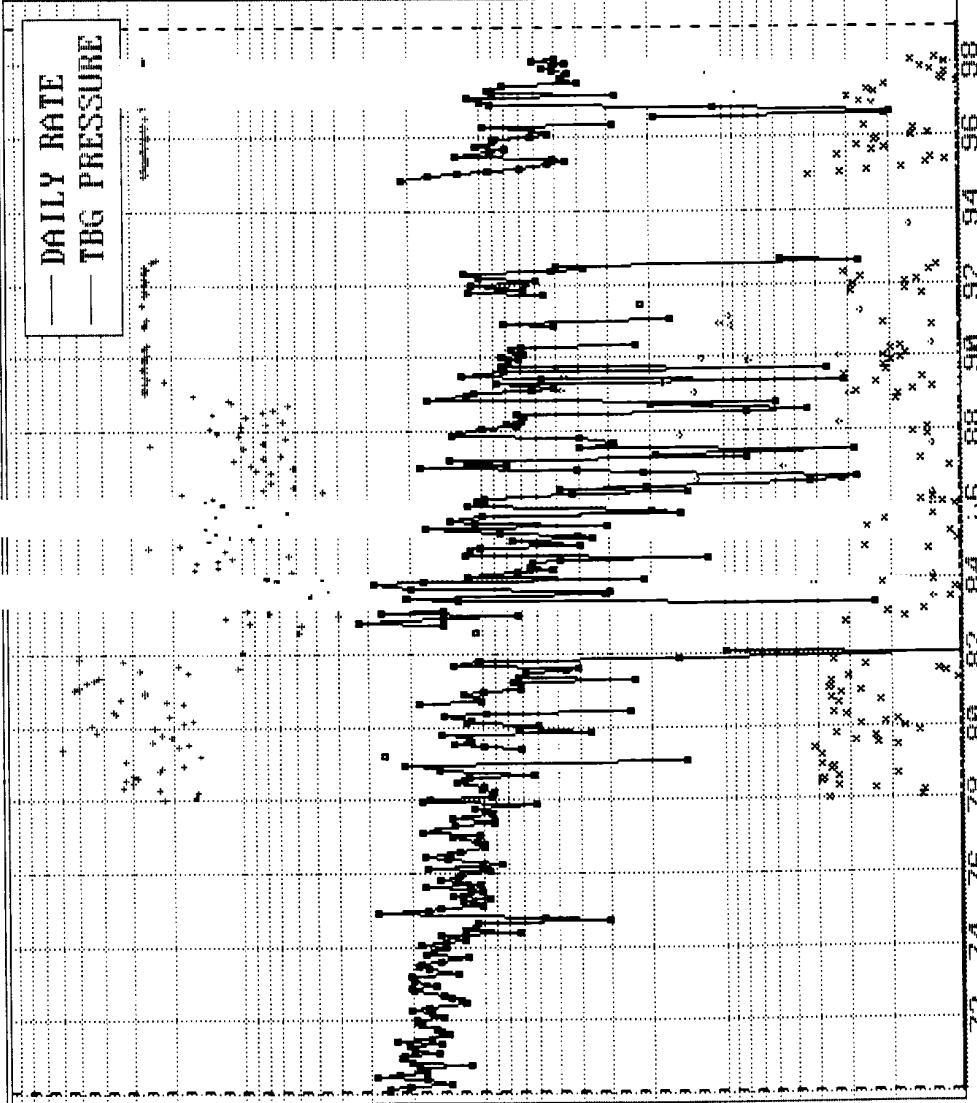
72 /4 76 78 80 82 84 86 88 90 92 94 96 98

Major = GAS

SAN JUAN 28-5 UNIT : 35 : DAKOTA

Prop 164 *

* OIL
* WATER/GAS
* GAS
* WATER



* WATER Bbls/d
* GAS Mcf/d
* WATER/GAS
* OIL Bbl/d

RateTime
Semi Log

Major = GAS

San Juan 28-5 Unit
#35
Bottom Hole Pressures
Flowing and Static BHP
Cullender and Smith Method
Version 1.0 1/14/98

Mesaverde		Dakota	
<u>MV-Current</u>		<u>DK-Current</u>	
GAS GRAVITY	<u>0.695</u>	GAS GRAVITY	<u>0.605</u>
COND. OR MISC. (C/M)	<u>C</u>	COND. OR MISC. (C/M)	<u>C</u>
%N2	<u>0.39</u>	%N2	<u>0.19</u>
%CO2	<u>0.95</u>	%CO2	<u>1.4</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>7</u>	DIAMETER (IN)	<u>2.375</u>
DEPTH (FT)	<u>5434</u>	DEPTH (FT)	<u>7705</u>
SURFACE TEMPERATURE (DEG F)	<u>60</u>	SURFACE TEMPERATURE (DEG F)	<u>60</u>
BOTTOMHOLE TEMPERATURE (DEG F)	<u>143</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>177</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>400</u>	SURFACE PRESSURE (PSIA)	<u>531</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>458.0</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>624.5</u>
<u>MV-Original</u>		<u>DK-Original</u>	
GAS GRAVITY	<u>0.695</u>	GAS GRAVITY	<u>0.605</u>
COND. OR MISC. (C/M)	<u>C</u>	COND. OR MISC. (C/M)	<u>C</u>
%N2	<u>0.39</u>	%N2	<u>0.19</u>
%CO2	<u>0.95</u>	%CO2	<u>1.4</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>7</u>	DIAMETER (IN)	<u>2.375</u>
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BOTTOMHOLE TEMPERATURE (DEG F)	<u>143</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>177</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>1100</u>	SURFACE PRESSURE (PSIA)	<u>2099</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>1281.6</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>2520.6</u>

Page No.: 4

Print Time: Fri May 08 08:28:38 1998

Property ID: 163

Property Name: SAN JUAN 28-5 UNIT | 35 | MESAVERDE

Table Name: S:\ARIES\78LTL\TEST.DBF

--DATE--	--CUM OIL--	---CUM GAS--	M SIWHP
	Bbl	Mcf	Psi

11/12/59		0	1100.0	Original
02/23/60		0	1087.0	
12/14/60		125000	858.0	
06/13/61		204000	815.0	
09/24/62		343000	822.0	
05/16/63		435000	753.0	
05/26/64		534000	748.0	
09/08/65		701000	727.0	
04/12/66		770000	696.0	
03/22/67		881000	686.0	
04/01/68		1005000	662.0	
05/15/69		1168255	631.0	
05/25/70		1298898	582.0	
05/04/71		1443315	562.0	
05/22/72		1579040	528.0	
08/21/73		1760089	475.0	
06/12/74		1878779	442.0	
08/17/76		2147766	449.0	
06/05/78		2363910	454.0	
06/04/80		2559123	382.0	
11/04/82		2743480	562.0	
05/01/84		2869149	451.0	
04/16/86		2992042	471.0	
09/04/89		3198517	482.0	
02/18/91		3271292	530.0	
08/26/91		3271506	542.0	
03/02/93		3376293	451.0	
04/01/93		3639810	400.0	Current estimated from P/z data

Page No.: 1

Print Time: Tue May 12 11:03:54 1998

Property ID: 164

Property Name: SAN JUAN 28-5 UNIT | 35 | DK

Table Name: S:\ARIES\78LTL\TEST.DBF

<u>--DATE--</u>	<u>--CUM OIL--</u> Bbl	<u>---CUM GAS---</u> Mcf	<u>M SIWHP</u> Psi
-----------------	---------------------------	-----------------------------	-----------------------

11/12/59		0	2099.0
05/25/70		607627	1001.0
05/04/71		677032	1012.0
05/22/72		745349	997.0
08/21/73		823346	959.0
09/04/75		922610	1144.0
01/24/77		986257	1090.0
06/07/79		1085379	985.0
05/01/81		1150306	1051.0
05/17/85		1270685	779.0
04/01/88		1504664	531.0

Original

Current estimated from P/z graph

Package Preparation Volume Data

DPNo: 53416A SAN JUAN 28-5 UNIT 35 Form: MV

Supt: 60 KEN RAYBON FF: 335 LARY BYARS MS: 319 STEVE BAIRD
Pipeline: WFS Plunger: No Dual: Yes Compressor: No

<u>Ownership (No Trust)</u>			<u>Prior Year</u>			<u>Current Year</u>			
	<u>Gas</u>	<u>Oil</u>			<u>Days</u>			<u>Days</u>	
GWI:	73.1659%	73.1659%		<u>MCF/M</u>	<u>BOPM</u>	<u>On</u>	<u>MCF/M</u>	<u>BOPM</u>	<u>On</u>
GNI:	62.3562%	62.3562%	Jan	5,562	65.0	31	5,307	89.0	31
			Feb	5,282	5.0	28	4,876	0.0	28
			Mar	6,631	76.0	31	4,623	43.0	31
Volumes			Apr	7,218	12.0	30	3,698	0.0	30
(Days On)	<u>MCFD</u>	<u>BOPD</u>	May	7,376	89.0	31	0	0.0	23.8
7 Day Avg	129	3.6	Jun	5,842	9.0	30	0	0.0	0
30 Day Avg	78	0.4	Jul	5,852	80.0	31	0	0.0	0
60 Day Avg	103	0.2	Aug	4,669	0.0	27	0	0.0	0
3 Mo Avg	148	0.5	Sept	4,924	1.0	30	0	0.0	0
6 Mo Avg	156	0.8	Oct	4,302	63.0	31	0	0.0	0
12 MoAvg	169	1.0	Nov	4,799	2.0	30	0	0.0	0
			Dec	4,904	2.0	31	0	0.0	0
Volumes			Total	67,361	404.0		18,504	132.0	
(Days in Month)	<u>MCFD</u>	<u>BOPD</u>							
30 Day Avg	59	0.3							
60 Day Avg	91	0.2							
3 Mo Avg	148	0.5							
6 Mo Avg	155	0.7							
12 Mo Avg	168	1.0							

Print Form

Get Volumes Data

Print Form

Export Volumes Data

Package Preparation Volume Data

DPN: 53416B

SAN JUAN 28-5 UNIT

35

Form: DK

Supt: 60 KEN RAYBON

FF: 335 LARY BYARS

MS: 319 STEVE BAIRD

Pipeline: WFS

Plunger: No

Dual: Yes

Compressor: No

<u>Ownership (No Trust)</u>			<u>Prior Year</u>			<u>Current Year</u>		
	<u>Gas</u>	<u>Oil</u>			<u>Days</u>			<u>Days</u>
				<u>MCF/M</u>	<u>BOPM</u>	<u>On</u>	<u>MCF/M</u>	<u>BOPM</u>
								<u>On</u>
GWI:	69.6124%	69.6124%	Jan	3,507	0.0	31	1,862	0.0
GNI:	58.8960%	58.8960%	Feb	850	0.0	15.3	1,474	0.0
			Mar	2,742	26.0	18	710	0.0
<u>Volumes</u>			Apr	2,893	0.0	30	1,671	0.0
<u>(Days On)</u>	<u>MCFD</u>	<u>BOPD</u>	May	2,485	0.0	31	0	0.0
7 Day Avg	24	0.0	Jun	1,180	0.0	30	0	0.0
30 Day Avg	52	0.0	Jul	1,369	0.0	31	0	0.0
60 Day Avg	54	0.0	Aug	1,408	0.0	27	0	0.0
3 Mo Avg	43	0.0	Sept	1,320	35.0	30	0	0.0
6 Mo Avg	48	0.0	Oct	1,518	0.0	31	0	0.0
12 Mo Avg	50	0.1	Nov	1,694	0.0	30	0	0.0
			Dec	1,330	0.0	31	0	0.0
<u>Volumes</u>			Total	22,296	61.0		5,717	0.0
<u>(Days in Month)</u>	<u>MCFD</u>	<u>BOPD</u>						
30 Day Avg	52	0.0						
60 Day Avg	54	0.0						
3 Mo Avg	43	0.0						
6 Mo Avg	48	0.0						
12 Mo Avg	49	0.1						

Print Form

Exit Volumes Data

6/17/98

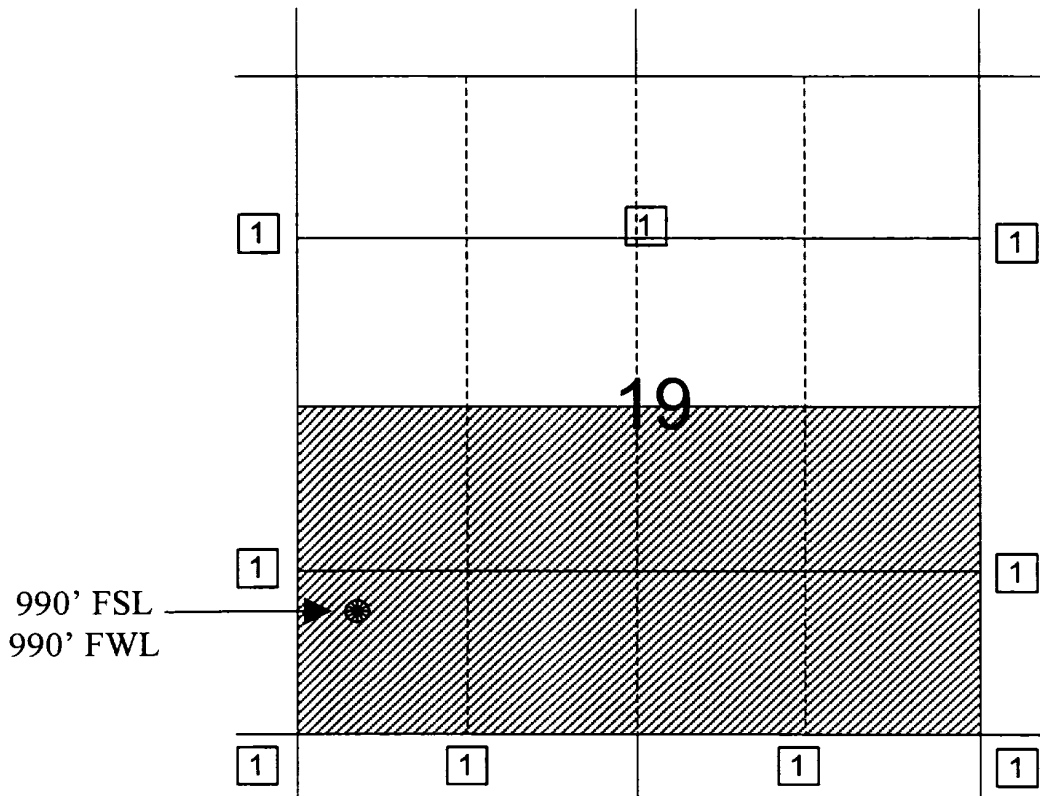
BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-5 Unit #35

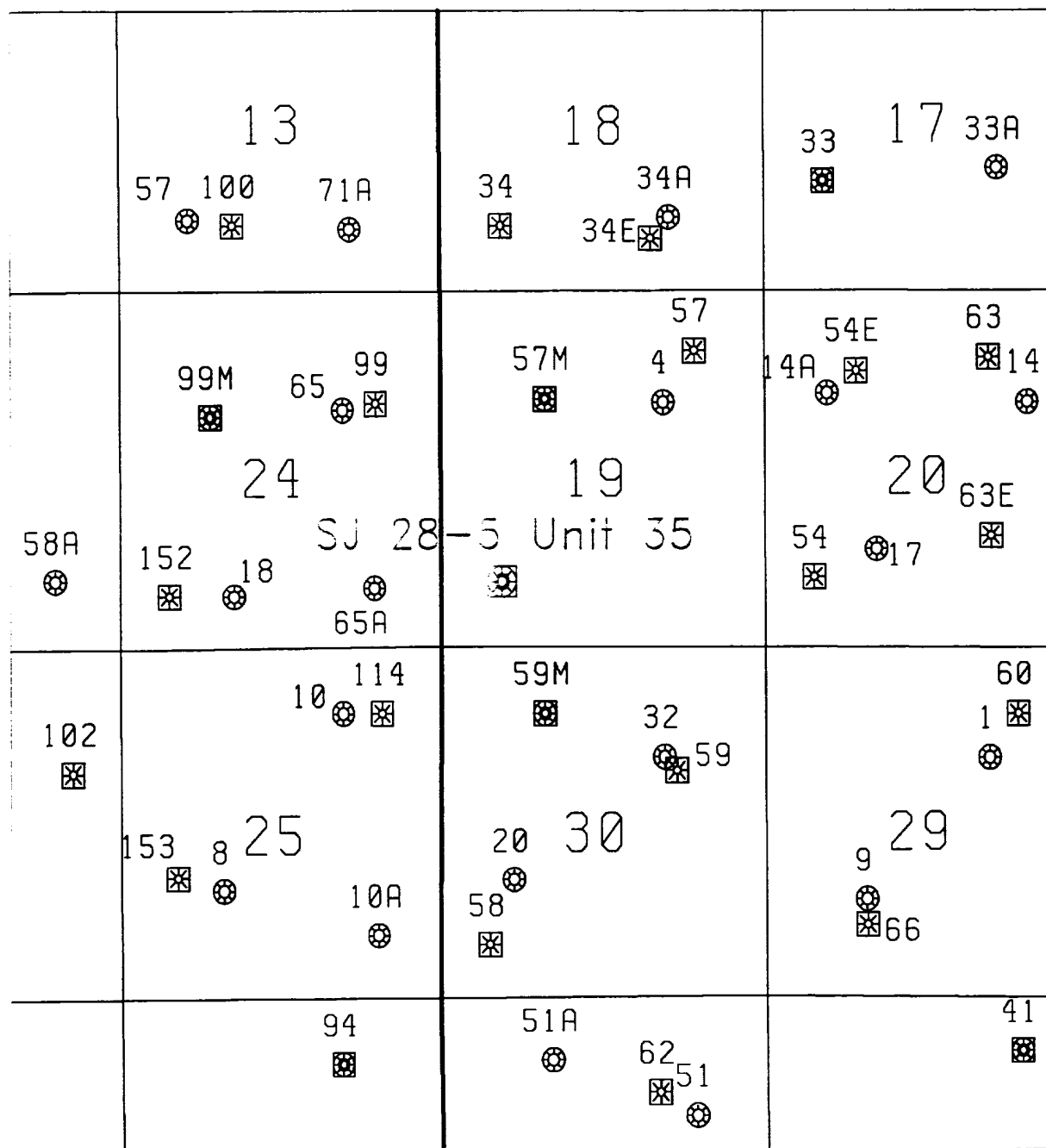
Offset Operator/Owner Plat

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

Township 28 North, Range 5 West



1) Burlington Resources



PLH 5/7/98

SJ 28-5 Unit 35
Sec. 19, T28N, R5W
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. 11627
ORDER NO. R-10695**

**APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 28-5 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 28-5 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 28-5 Unit which encompasses some 17,399 acres in Township 28 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 28-5 Unit, the applicant currently operates sixty-seven (67) Basin-Dakota Gas Pool wells, seventy-one (71) Blanco-Mesaverde Gas Pool wells, sixteen (16) Gobernador-Pictured Cliffs, Oso-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and nineteen (19) Basin-Fruitland Coal Gas Pool wells.

(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 28-5 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 28-5 Unit;

- c) 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 28-5 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 28-5 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 28-5 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 1,258 MMCFG and 77 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 276 MCFGD and 136 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 28-5 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 28-5 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 3,149 psi and 1,143 psi, respectively; and,
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1,059 psi and 714 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 28-5 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 28-5 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 28-5 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 28-5 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 28-5 Unit every time a Form C-107-A is submitted to the Division. There are a considerable number of such interest owners within the unit;

- c) providing notice to each interest owner within the San Juan 28-5 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 28-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-5 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 28-5 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 28-5 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 28-5 Unit, San Juan County, New Mexico, is hereby approved.

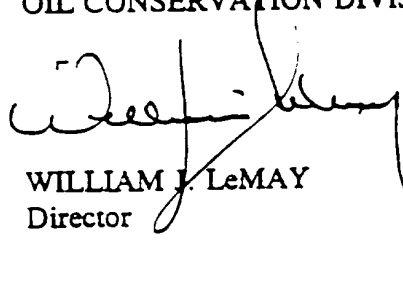
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 28-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify 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 28-5 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 28-5 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

S E A L