

<b>DISTRICT I</b> PO Box 1980, Hobbs, NM 88241-1980	<b>State of New Mexico</b>  <b>Energy, Minerals and Natural Resources Department</b> <b>OIL CONSERVATION DIVISION</b>  2040 S. Pacheco Santa Fe, New Mexico 87505-6429	<b>Form C-107-A</b> New 3-12-96  <b>APPROVAL PROCESS:</b>  ____ Administrative ____ Hearing <b>EXISTING WELLBORE</b> ____ YES ____ X NO
<b>DISTRICT II</b> 811 South First St., Artesia, NM 88210-2835		
<b>DISTRICT III</b> 1000 Rio Brazos Rd., Axtec, NM 87410-1693		

**APPLICATION FOR DOWNHOLE COMMINGLING**

<b>Burlington Resources Oil &amp; Gas Company</b>	<b>PO Box 4289, Farmington, NM 87499</b>
<b>Operator</b>	<b>Address</b>
<b>SAN JUAN 28-6 UNIT</b>	<b>132M C 32-28N-06W Rio Arriba</b>
<b>Lease</b>	<b>Well No. Unit Ltr. - Sec - Twp - Rge County</b>
<b>Spacing Unit Lease Types: (check 1 or more)</b>	
<b>OGRID NO. 14538</b>	<b>Property Code 7462 API NO. 30-039-25730 Federal X State (and/or) Fee</b>

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)	will be supplied upon completion		will be supplied upon completion
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. 610 psi (see attachment)  (Original) b. 1291 psi (see attachment)	a.  b.	a. 1101 psi (see attachment)  b. 3112psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1148		BTU 1080
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  Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
* If Producing, give data and oil/gas/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: %  will be supplied upon completion	Oil: % Gas: %  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? X Yes ☒ No ☐
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 reliable. X Yes ☒ No (If No, attach explanation)
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? 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. X Yes ☒ No ☐
15. NMOC Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10696
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 Sean C. Woolverton TITLE Production Engineer DATE 10/17/97

TYPE OR PRINT NAME Sean C. Woolverton TELEPHONE NO. ( 505 ) 326-9700

District I  
PO Box 1980, Hobbs, NM 88241-1980  
District II  
PO Drawer 00, Artesa, NM 88211-0719  
District III  
1000 Rio Brazos Rd., Aztec, NM 87410  
District IV  
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico  
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION  
PO Box 2088  
Santa Fe, NM 87504-2088

Form C  
Revised February 21.  
Instructions on  
Submit to Appropriate District C  
State Lease - 4 C  
Fee Lease - 3 C

☐ AMENDED REF

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Well Code	Well Name
30-039-	72319/71599	Blanco Mesaverde/Basin Dakota
Property Code	Property Name	Well Number
7462	San Juan 28-6 Unit	132M
OGUID No.	Operator Name	Elevation
14538	BURLINGTON RESOURCES OIL & GAS COMPANY	6223'

10 Surface Location

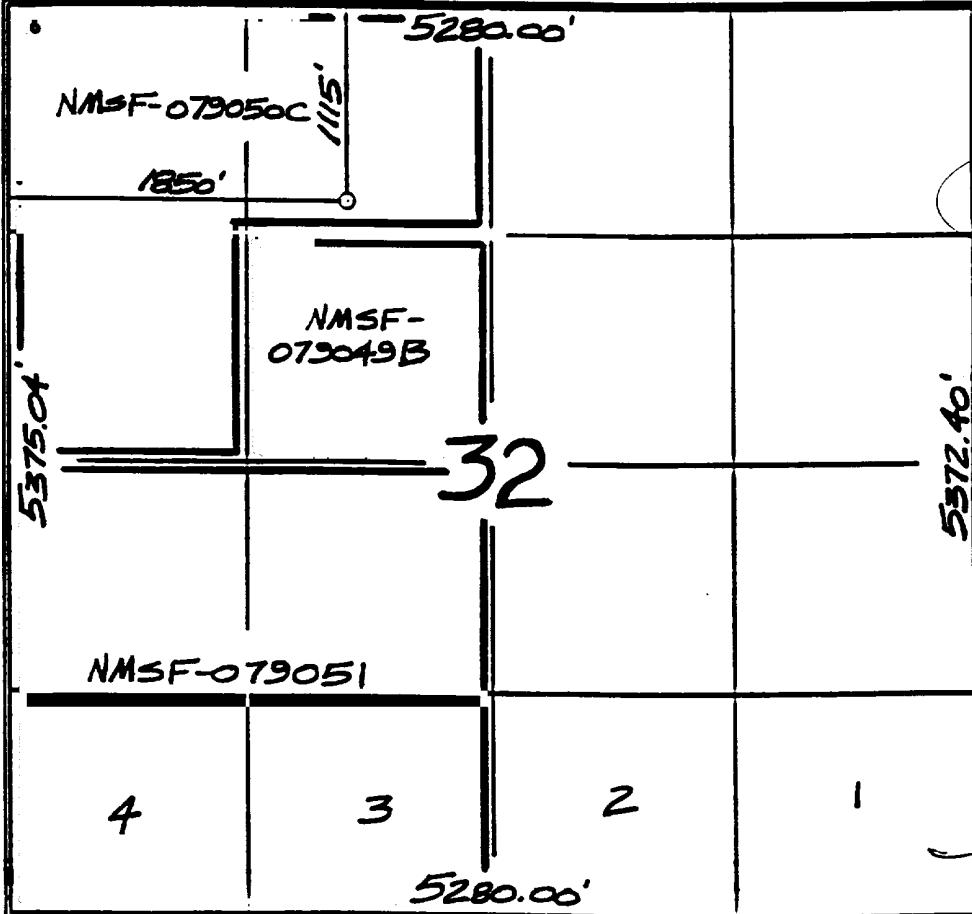
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	32	28-N	6-W		1115	North	1850	West	R.A.

11 Bottom Hole Location if Different From Surface

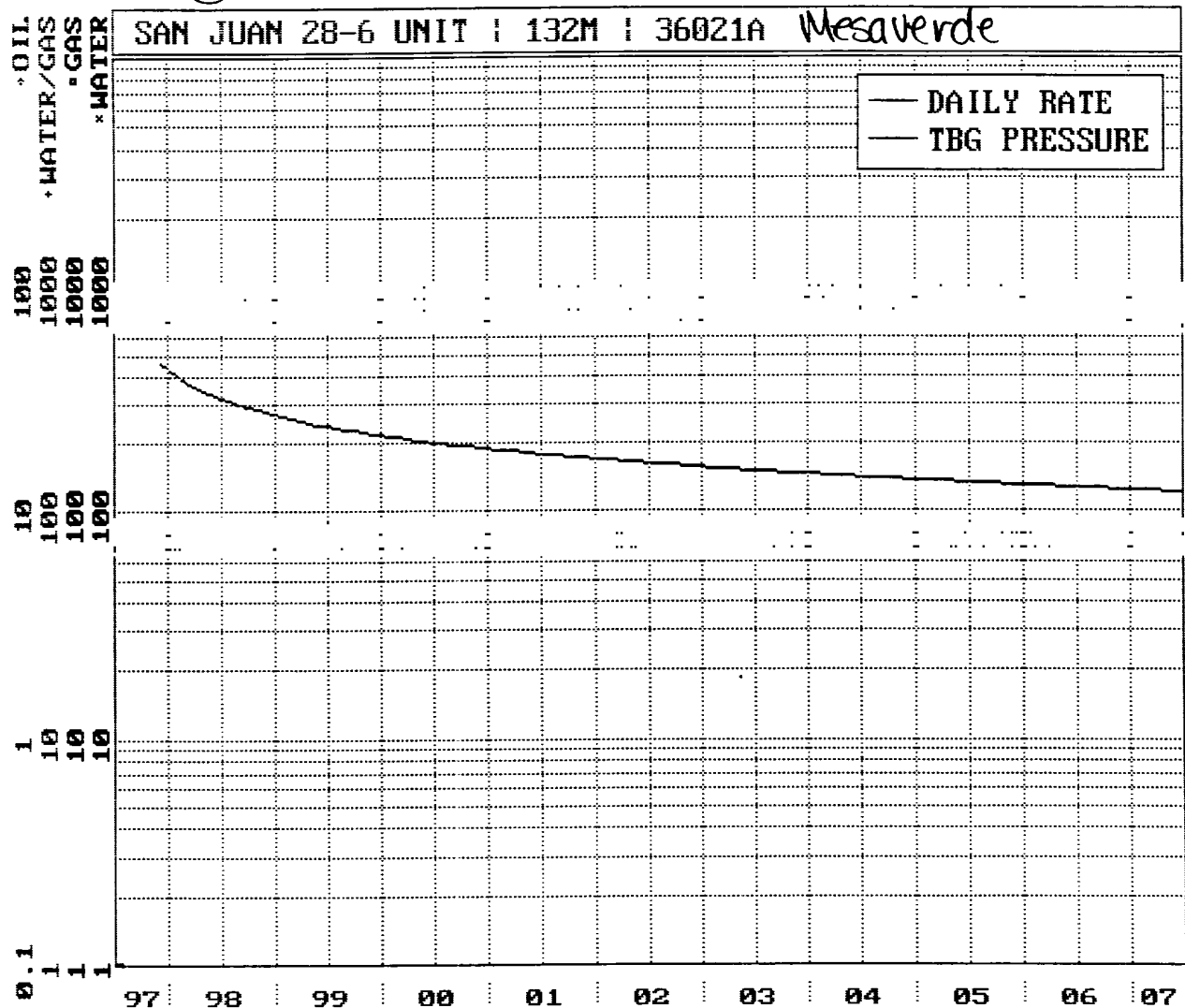
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

12 Dedication Acres	13 Joint or Infill	14 Consolidation Code	15 Order No.
MV-W 325.23	DK-W 325.23		

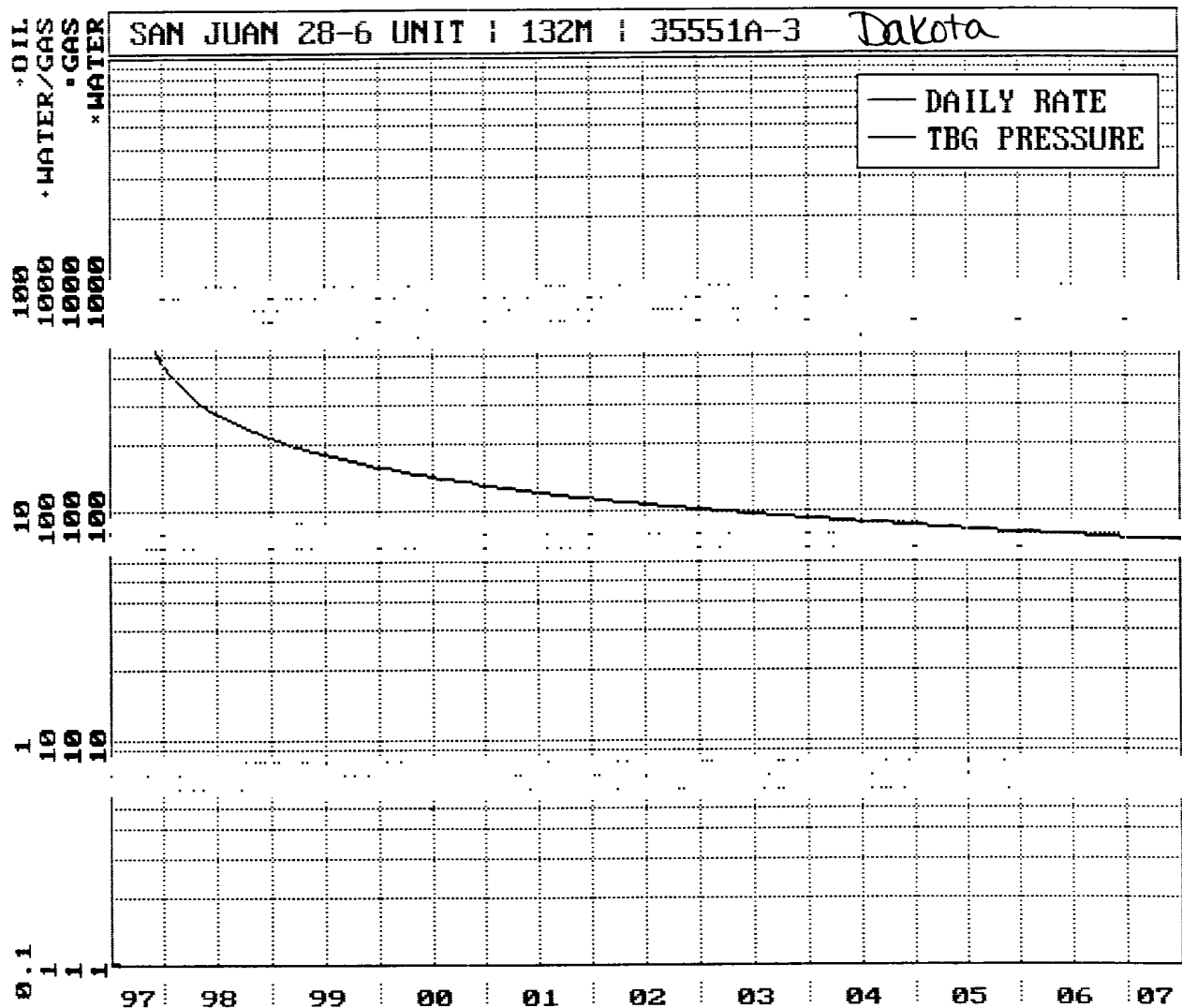
NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

				<p>17 OPERATOR CERTIFICATE</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Peggy Bradfield</i> Signature Peggy Bradfield Position Name Regulatory Administrator Title Date 7-11-97</p>	
				<p>18 SURVEYOR CERTIFICATE</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made or under my supervision, and that the same is true, correct to the best of my belief.</p> <p>6/10/97 Date of Survey Signature and Seal of Professional Surveyor NEAL C. EDWARDS NEW MEXICO 6857 6857 Certificate Number</p>	

# EXPECTED PRODUCTION CURVE



# EXPECTED PRODUCTION CURVE

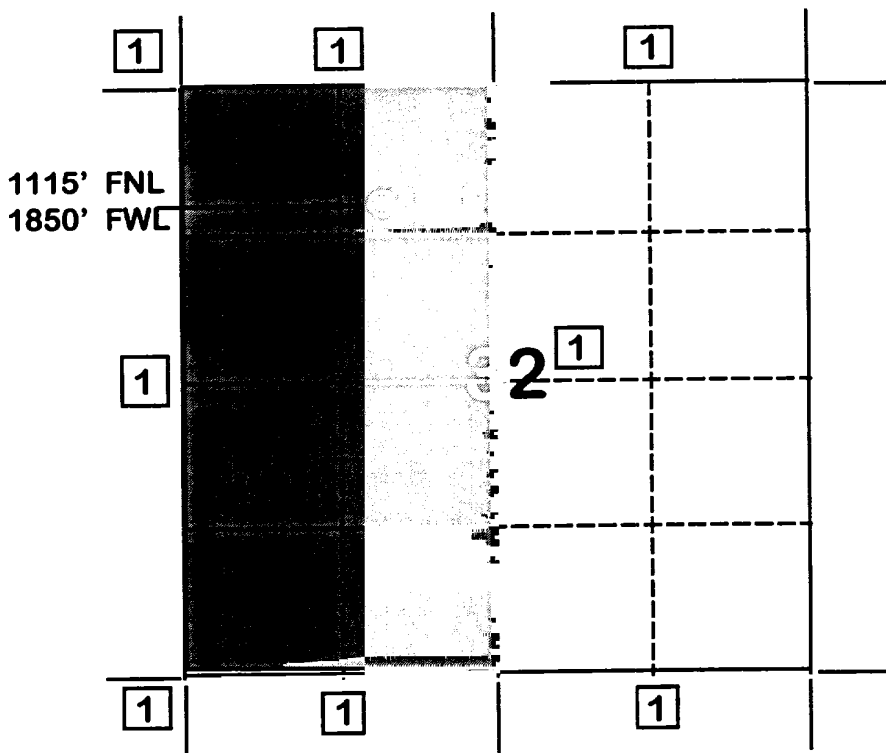


***BURLINGTON RESOURCES OIL AND GAS COMPANY***

**San Juan 28-6 Unit #132M  
OFFSET OPERATOR \ OWNER PLAT**

**Mesaverde / Dakota Formations Commingle Well**

**Township 28 North, Range 6 West**



**1) Burlington Resources Oil and Gas Company**

**San Juan 28-6 Unit #132M**

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

<b>Mesaverde</b>		<b>Dakota</b>	
<b><u>MV-Current</u></b>		<b><u>DK-Current</u></b>	
GAS GRAVITY	0.667	GAS GRAVITY	0.639
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.23	%N2	0.77
%CO2	0.72	%CO2	1.34
%H2S	0	%H2S	0
DIAMETER (IN)	2	DIAMETER (IN)	1.5
DEPTH (FT)	5544	DEPTH (FT)	7699
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	137	BOTTOMHOLE TEMPERATURE (DEG F)	198
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	532	SURFACE PRESSURE (PSIA)	922
BOTTOMHOLE PRESSURE (PSIA)	609.5	BOTTOMHOLE PRESSURE (PSIA)	1100.5
<b><u>MV-Original</u></b>		<b><u>DK-Original</u></b>	
GAS GRAVITY	0.667	GAS GRAVITY	0.639
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.23	%N2	0.77
%CO2	0.72	%CO2	1.34
%H2S	0	%H2S	0
DIAMETER (IN)	2	DIAMETER (IN)	1.5
DEPTH (FT)	5544	DEPTH (FT)	7699
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	137	BOTTOMHOLE TEMPERATURE (DEG F)	198
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1112	SURFACE PRESSURE (PSIA)	2576
BOTTOMHOLE PRESSURE (PSIA)	1291.1	BOTTOMHOLE PRESSURE (PSIA)	3111.7

Page No.: 5

Print Time: Fri Oct 03 15:46:24 1997

Property ID: 1845

Property Name: SAN JUAN 28-6 UNIT | 130 | 44095A-1

Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE--	---CUM GAS--	M SIWHP
■■■■■■■■■■	■■■■■■■■■■Mcf■■■■■■■■■■	■■■■■■■■■■Psi■■■■■■■■■■
12/11/72	0	2576.0 - original
08/13/73	32130	1511.0
07/31/74	91848	932.0
06/24/75	124594	808.0
07/12/76	165344	699.0
08/08/77	198333	700.0
10/01/79	249061	720.0
11/07/85	356493	827.0
05/28/92	455548	922.0 - current

San Juan 28-6 Unit  
# 132 M

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Dakota Offset

Page No.: 3

Print Time: Fri Oct 03 15:46:23 1997

Property ID: 4034

Property Name: SAN JUAN 28-6 UNIT | 51 | 49951A-1

Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE-- ---CUM\_GAS-- M SIWHP  
-----Mcf-----Psi

03/11/57	0	1112.0	-original
03/29/57	0	1111.0	
11/22/58	63000	985.0	
08/22/59	168000	582.0	
03/29/60	204000	773.0	
12/24/61	359000	700.0	
04/23/62	374000	716.0	
02/22/63	407000	758.0	
02/24/64	446000	793.0	
02/25/65	515000	764.0	
01/04/66	570000	713.0	
07/10/67	674000	672.0	
07/12/68	746000	663.0	
06/05/69	813715	651.0	
04/21/70	901560	630.0	
03/23/71	974937	589.0	
08/08/72	1102624	569.0	
09/04/73	1197197	519.0	
04/16/74	1247076	517.0	
06/08/76	1446004	487.0	
05/03/78	1592101	466.0	
06/20/80	1714531	504.0	
05/27/82	1797961	511.0	
07/27/84	1864117	547.0	
05/02/87	1931464	648.0	
03/29/93	2066626	532.0	-current

San Juan 28-6 Unit  
#132 M

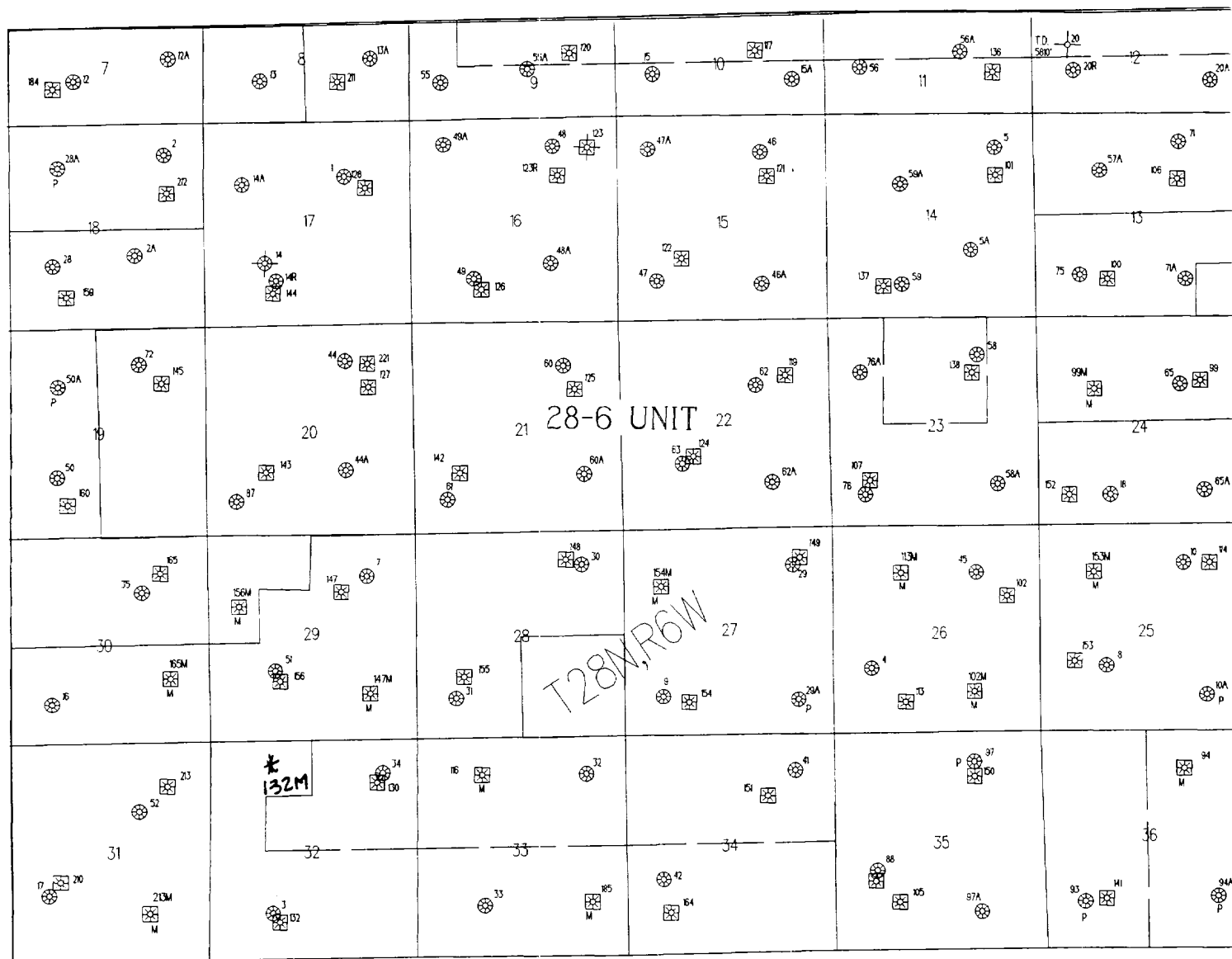
Mesa Verde Offset



# San Juan 28-6 Unit #132M

## Mesaverde / Dakota

### 28N-06W-32C



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. 11628  
ORDER NO. R-10696

APPLICATION OF BURLINGTON RESOURCES  
OIL & GAS COMPANY FOR THE ESTABLISHMENT  
OF A DOWNHOLE COMMINGLING "REFERENCE  
CASE" FOR ITS SAN JUAN 28-6 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 28-6 Unit, San Juan County, New Mexico.
- (3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

- 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 28-6 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 28-6 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 28-6 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 449 MMCFG and 186 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 254 MCFGD and 216 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 28-6 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 28-6 Unit, the applicant presented engineering evidence and testimony which indicates that:

- c) providing notice to each interest owner within the San Juan 28-6 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 28-6 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-6 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 28-6 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 28-6 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 28-6 Unit, San Juan County, New Mexico, is hereby approved.