DISTRICT I 1625 N. French Dr Hobbs, NM 88240 DISTRICT II 811 South First St. Artesia, NM 88210 DISTRICT III o Brazos Rd, Aztec, NM 87410 DISTRICT IV

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 APPLICATION FOR DOWNHOLE COMMINGLING PO BOX 4289, FARMINGTON, NM 87499 **BURLINGTON RESOURCES OIL & GAS COMPANY** Address Operator O 23-28N-06W RIO ARRIBA 138M SAN JUAN 28-6 UNIT County Well No. Spacing Unit Lease Types: (check 1 or more) 2/25 API NO.__30-039-XXXXX_ _ , State . , (and/or) Fee Federal 7462 OGRID NO. 14538 Property Code Intermediate Zone Lower Zone The following facts are submitted in support of downhole commingling: Upper Zone BASIN DAKOTA - 71599 BLANCO MFSAVERDE - 72319 Pool Name and Pool Code 2. Top and Bottom of Pay Section (Perforations) WILL BE SUPPLIED UPON COMPLETION WILL BE SUPPLIED UPON 3. Type of production (Cil or Gas) GAS FLOWING 4. Method of Production (Fowing or Art heal Lift) FLCWING a. (Current) a. (Current) 5. Bottomhole Pressure Oil Zones - Art.ficial Lift: Estimated Current 1185 psi (see attachment) 592 psi (see attachment) Gas & Oil - Flowing: Measured C irrent b. ^(Oragina.) b. (zngma) Al: Gas Zones: Estimated Or Measured Ciliginal 3273 psi (see attachment) 1272 psi (see attachment) 6. Oil Gravity (FAPI) or Gas BTU Content BTU 1058 STU 1237 SHUT-IN SHUT-IN 7. Producing or Shut-In? Production Marginal? (yes or no) Date: N/A Date: N/A Date: N/A 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 estimates and supporting data Date: N/A Date: N/A Date: N/A Rates: Rates: If Producing, give date andoil/gas/ water rates of recent test (within 60 days) Rates: 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: Gas: Oil: Gas: Gas: WILL BE SUPPLIED UPON COMPLETION % %
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. 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 If yes, are fluids compatible, will the formations not be damaged, will any cross-No _X_ Yes flowed production be recovered, and will the allocation formula be reliable. _X_Yes ____ No (If No, attach explanation) _X_ Yes _ 12. Are all produced fluids from all commingled zones compatible with each other? (If Yes, attach explanation) 13. Will the value of production be decreased by commingling? 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-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 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.

TTTLE

PRODUCTION ENGINEER

12/10/99

DATE:

TELEPHONE NO. 505-326-9700 TYPE OR PRINT NAME DAN T. VOECKS

SIGNATURE

DISTRICT | P.O. Box 1980, Hobbs, N.M. 88241-1980

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office

DISTRICT II P.O. Drawer DD, Artesia, N.M. 88211 -0719

DISTRICT III

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

State Lease — 4 Copies Fee Lease — 3 Copies

1000 Rio Brazos Rd., Aztec, N.M. 87410

DISTRICT IV

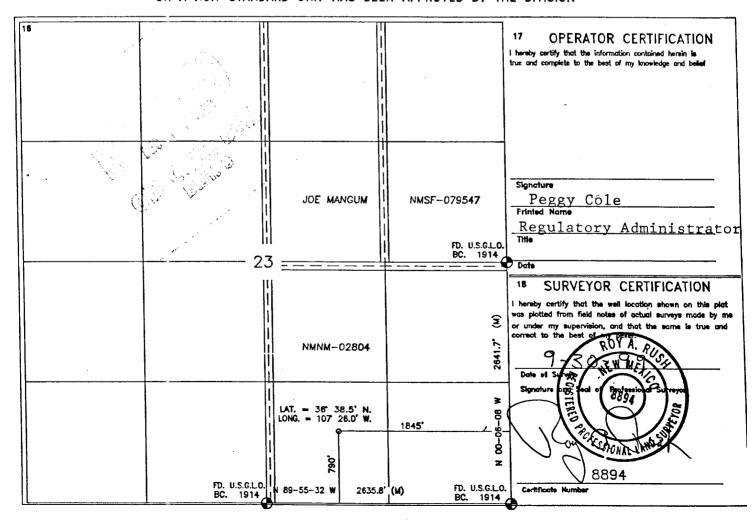
PO Box 2088, Santa Fe, NM 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-039-			³ Pool Code 72319/71599		99	³P∞l Nome Blanco Mesaverde/Basin Dakota			
Property Code 7462			Property Name SAN JUAN 28-6 UNIT					* Well Number 138M	
70GRID No.		*Operator Name BURLINGTON RESOURCES OIL & GAS COMPANY						° Elevation 6522'	
•			,		¹⁰ Surface	Location		- 1	2'
UL or lot no.	Section 23	Township 28-N	Ronge 6-W	Lot Idn	Feet from the 790	North/South line SOUTH	Feet from the 1845	East/West fine EAST	County RIO ARRIBA
			11 Botto	m Hole	Location If	Different From	Surface		
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South Ilne	Feet from the	East/West line	County
12 Dedicated Acres E/320	13 Joint	or Infill 14	Consolidatio	n Code 15	Order No.	_L	<u> </u>		

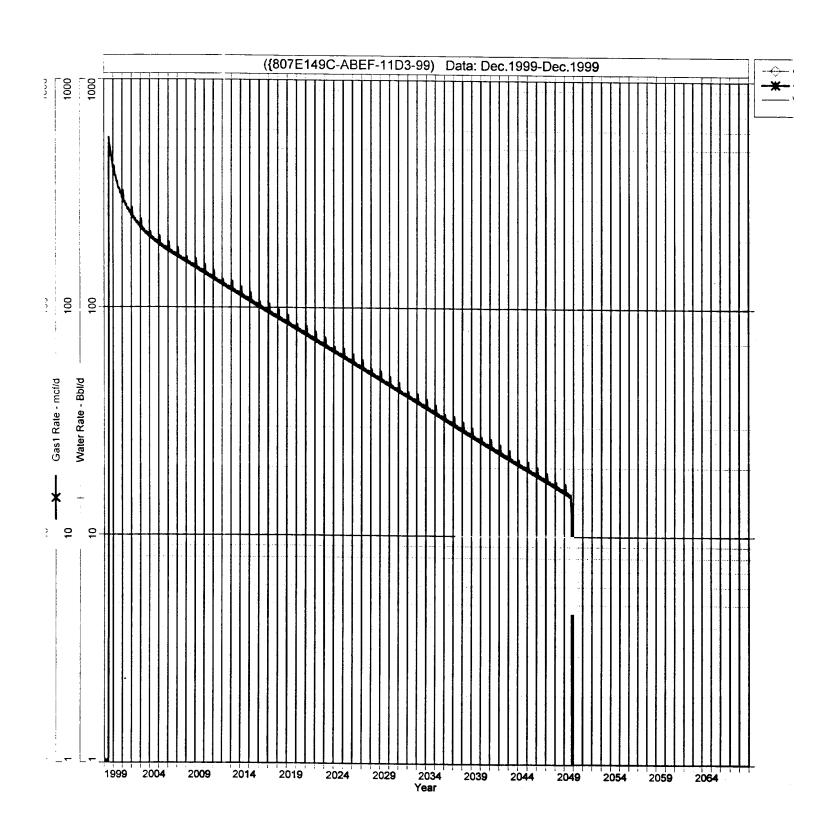
NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



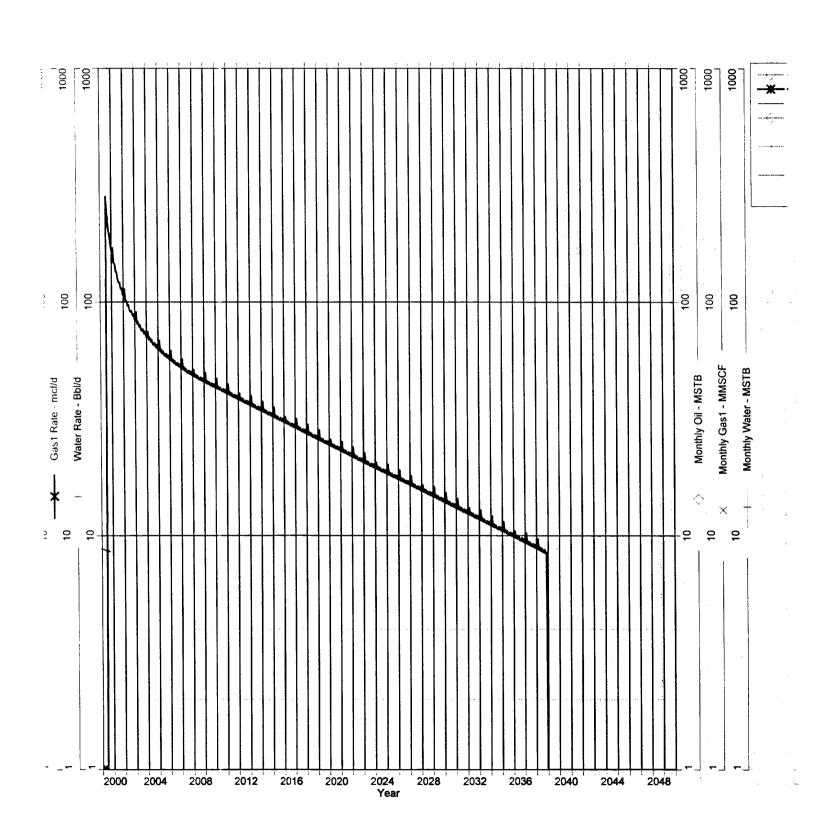
San Juan 28-6 Unit #138M

Expected Production

Mesaverde Formation



San Juan 28-6 Unit #138M
Expected Production
Dakota Formation



San Juan 28-6 Unit #138M

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

Mesaverde	Dakota			
MV-Current	DK-Current			
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.11 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 582.2	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.13 %CO2 1.44 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1184.6			
MV-Original	DK-Original			
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.23 %CO2 1.11 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1271.7	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.13 %CO2 1.44 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3273.4			

Page No.: 1

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Property ID: 1886
Property Name: SAN JUAN 28-6 UNIT | 58 | 51871A
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

חשאה	CITM CAC	M CTWUD	
DAIE	CUM_GAS	m Siwne	
	I'IC Listania		
06/30/56	0	1078.0	San Juan 28-6 Unit #138M
07/17/56	0	1077.0	
12/30/57	410000	784.0	Mesaverde Offset
10/29/58	527000	868.0	
06/14/59	699000	794.0	
06/14/60	970000	704.0	
03/05/61	1135000	723.0	
05/29/62	1297000	762.0	
05/16/63	1419000	718.0	
05/26/64	1542000	730.0	
03/08/65	1675000	640.0	
04/12/66	1891000	665.0	
10/21/66	1999000	659.0	
03/22/67	2081000		
04/01/68	2267000	637.0	
05/15/69	2485338	604.0	
05/25/70			
05/04/71			
05/22/72			and the second of the second o
08/21/73			
07/31/74			
08/17/76			
06/05/78			
10/03/80			
05/18/82			
10/20/86			
11/27/89			
09/04/91			
10/21/91			
05/03/93	4399)45	502.0	

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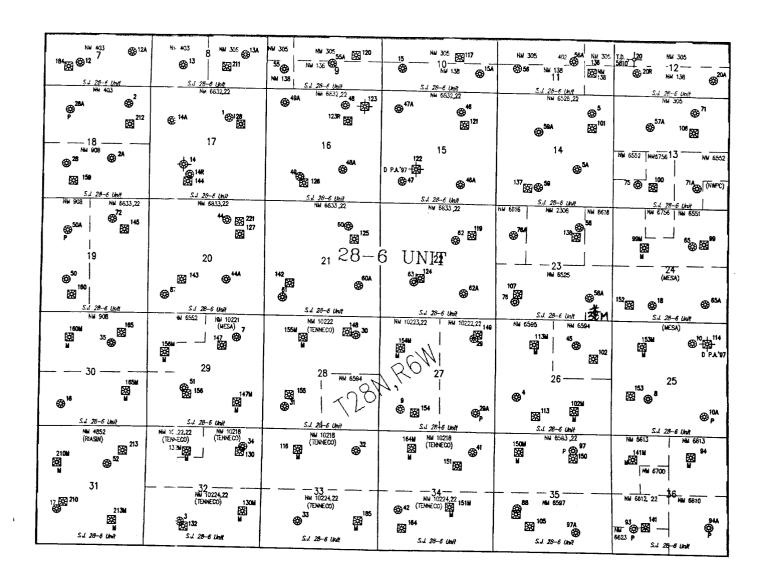
Property ID: 1732

Property Name: SAN JUAN 28-6 UNIT | 138 | 52199A Table Name: R:\RESERVES\GDPNOS\TEST.DBF

DATE	CUM_CAS	M SIWHP Psi
08/03/67	0	2753.0
11/17/67	52000	1651.0
04/01/68	96000	1437.0
08/19/69	237000	990.0
05/25/70	291621	958.0
05/04/71	371786	844.0
09/12/72	460129	852.0
08/21/73	513540	949.0
06/24/75	59448 8	1177.0
06/01/77	68096 6	1212.0
06/07/79	778923	1020.0
04/21/81	856611	970.0
09/22/83	920201	1214.0
06/07/85 10/15/88 06/08/90	975490 1049306	1028.0 1322.0
07/01/92	1103328 1174464	1252.0 1004.0

San Juan 28-6 Unit #138M

Dakota Offset



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:

- 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.