State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

D-28-29N-07W

Form C-107-A New 3-12-96 APPROVAL PROCESS: _X_ Administrative ____Hearing

Rio Arriba

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

1000 Rio Brazos Rd, Aztec, NM 87410-1693

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

DISTRICT!

DISTRICT II

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE X_YES __NO

Burlington Resources	Oil and Gas
Operator San Juan 29-7 Unit	#124M

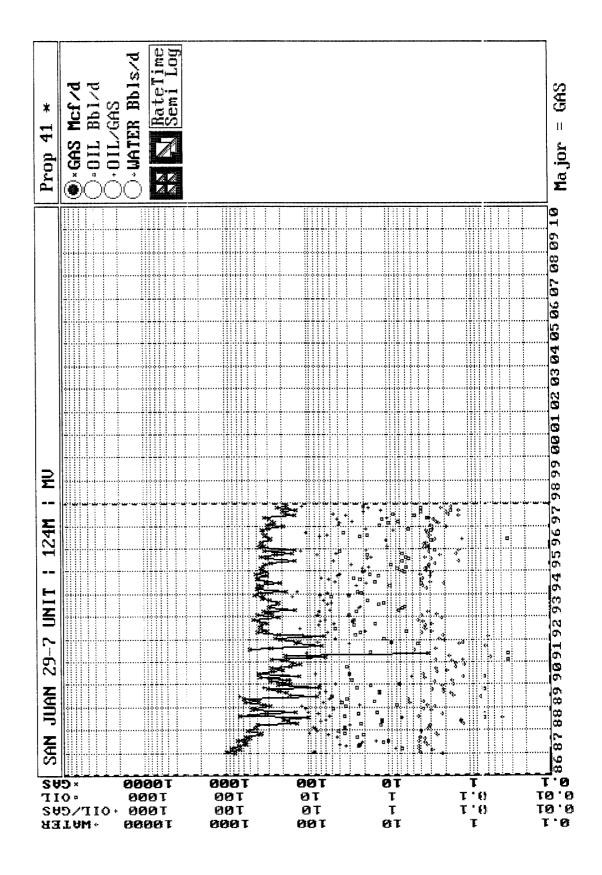
PO Box 4289, Farmington, NM 87499

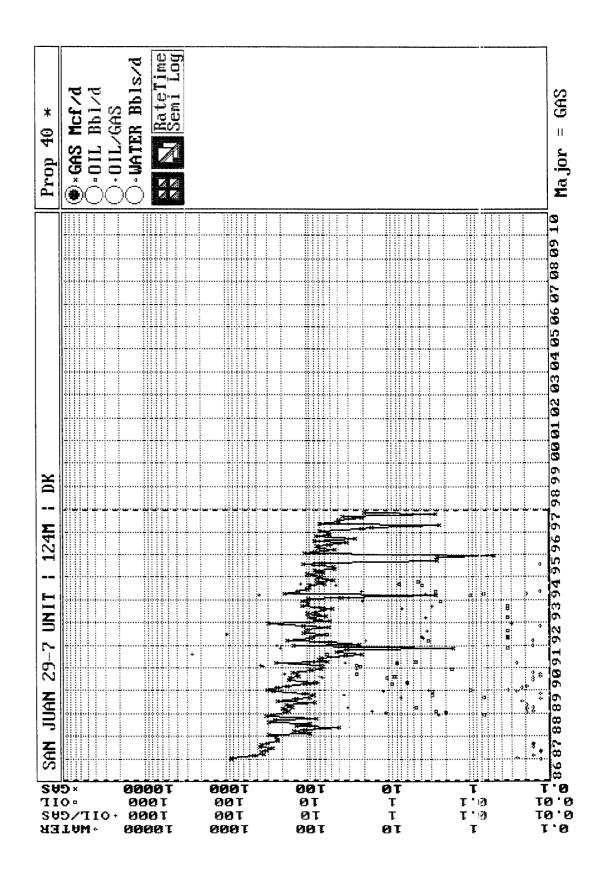
Lease	Well No. Unit Ltr Sec - Ti	··· - · · · · · · · · · · · · · · · · ·	ounty						
OGRID NO14538 Property C	ode7465 API NO3	· -	t Lease Types: (check 1 or more) , State, Fee						
		<u> </u>							
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone Zone						
Pool Name and Pool Code	Mesa Verde - 72319		Dakota - 71599						
Top and Bottom of Pay Section (Perforations)	4873'-5796'	DECEINED	7509'-7755'						
3. Type of production (Oil or Gas)	Gas	MAR - 4 1998	Gas						
4. Method of Production (Flowing or Artificial Lift)	Flowing	oil con. div.	Flowing						
5. Bottomhole Pressure Oil Zones - Artificial Lift:	(Current) a. 385 psi (see attachment)	DIST. 3	a. 432 psi (see attachment)						
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 877 psi (see attachment)		b. 3143 psi (see attachment)						
6. Oil Gravity (°API) or Gas BTU Content	BTU 1170		BTU 1013						
7. Producing or Shut-In?	Producing		Producing						
Production Marginal? (yes or no)	No		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									
If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: 2/98 Rates: 216 mcfd 1.6 bopd		Date: 2/98 Rates: 47 mcfd 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 XNo If not, have all working, overriding, and royalty interests been notified by certified mail? Yes XNo Have all offset operators been given written notice of the proposed downhole commingling? Yes XNo Have all offset operators been given written notice of the proposed downhole commingling? Yes XNo (If No, attach explanation) 11. Will cross-flow occur? XYes No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowe production be recovered, and will the allocation formula be reliable. XYes No (If No, attach explanation) 12. Are all produced fluids from all commingled zones compatible with each other? XYes No 13. Will the value of production be decreased by commingling? Yes XNO (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 State Bureau of Land Management has been notified in writing of this application. XYes No 15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). Reference Order # R-10697 16. ATTACHMENTS: 16. ATTACHMENTS: 17. Yes Yes You No 18. Attach explanation. 18. Yes Yes You No 19. Yes Yes You No 19. Yes Yes You No 19. Yes Yes You No 10. Yes Yes You No 10. Yes Yes You No 11. Will cross-flow occur? Yes									
I hereby certify that the information SIGNATURE	mation above is true and co	omplete to the best of my kn	owledge and belief.						
•									
TYPE OR PRINT NAME L.	Tom Loveland	1ELEPHONE NO. (_5U5	_)320-3700						

E0011 24 11

MEXICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

		All distances must be	from the outer boundaries of	of the Section			•
Operator			Lease			Well No.	
EL PASO	NATURAL GAS	COMPANY	SAN JUAN 29	-7 UNIT	(SF 0789	945) 124M	-
Unit Letter	Section	Township	Range	County	191	· · · · · · · · · · · · · · · · · · ·	
D	28	29N	7W	R:	io Arriba		-
Actual Footage Loc	ation of Weil:			1		·	
1120	lest from the	North line and	1120 ,_		West		•
Ground Level Elev:	Producing For		Pool	t from the		line Dedicated Acreage:	
6499	1 -	erde/Dakota	Blanco/Bas	; _n	İ	· · · · · · · · · · · · · · · · · · ·	
						· · · · · · · · · · · · · · · · · · ·	Acres
1. Outline th	e acreage dedica	ited to the subject w	ell by colored pencil	or hachure	marks on th	ie plat below.	
interest a	nd royalty).	dedicated to the wel			•		C
3. If more the	in one lease of dommunitization, i	lifferent ownership is unitization, force-pool	dedicated to the well, ing. etc?	, have the i	interests of	all owners been co	nsoli-
X Yes	☐ No If a	nswer is "yes;" type (of consolidation	Unitiza	ation		
· If answer	is "no," list the	owners and tract desc	riptions which have a	ctually bed	en consolida	ated. (Use reverse s	ide of
this form i	necessary.)						
No allowat	ole will be assign	ed to the well until al	l interests have been	consolidat	ed (by com	munitization unitiz	ation
forced-poo	ling, or otherwise	or until a non-standar	d unit. eliminating su	ch interest	s. has been	approved by the Co	mmis.
sion.					o, boo	approved by the ob	
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mmm						CERTIFICATION	
	1						
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//			FARMINGTON RESOURCE	F WIEW	Position	ing Clerk	
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	Sca	le: 1"=1000'				0460	





San Juan 29-7 Unit #124M Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method

Version 1.0 1/14/98

Dakota
DK-Current
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.25 %CO2 1.62 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 7632 SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) 192 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 371 BOTTOMHOLE PRESSURE (PSIA) 431.7
DK-Original
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.25 %CO2 1.62 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3142.7

Page No.: 1
Print Time: Wed Feb 04 14:39:06 1998

Property ID: 41
Property Name: SAN JUAN 29-7 UNIT | 124M | MV
Table Name: S:\ARIES\1MXJ\TEST.DBF

<u>DATE</u>	CUM_OIL- Bbl	CUM_GAS Mcf	M_SIWHP Psi	
10/06/87 10/07/87 10/07/89 02/18/91 06/20/91 07/05/93		0 220748 463684 568726 576332 827678 1 2 64324	762.0 Original 511.0 502.0 578.0 590.0 460.0 338.0 Current Estimated from P/Z dat	Z

Page No.: 1

Print Time: Wed Feb 04 14:38:55 1998

Property ID: 40

Property Name: SAN JUAN 29-7 UNIT | 124M | DK Table Name: S:\ARIES\1MXJ\TEST.DBF

DATE	CUM_OIL-	CUM_GAS Mcf	M_SIWHP Psi	
02/06/86		0	2650.0	Criginal
11/23/87 08/31/88		151264 194675	1057.0	
05/09/90		305936	933.0	
03/19/93		405380	814.0	_
W/01/97		506986	371.0	Current Estimated from F/Z data

Package Preparation **Volume Data**

DPNo: 54477A SANJUAN 29-7 UNIT 12AM Form: MV

Supt: 60 KEN RAYBON

FF: 335 LARY BYARS

MS: 318 J.R TRUJILLO

Pipeline: EPNG

Plunger: No

Dual: Yes

Compressor: No

<u>Ow</u>	Ownership (No Trust)				Prior Year			Current Year		
	<u>Gas</u>	<u>Oil</u>				<u>Days</u>			Day s	
GWI:	62.5191%	62.5191%		MCF/M	BOPM	<u>On</u>	MCF/M	BOPM	<u>On</u>	
GNI:	52.8043%	52.8043%	Jan	11,529	0.0	31	9,505	38.0	31	
			Feb	9,992	10.0	29	7,710	30.0	28	
Volumes			Mar	11,458	0.0	31	8,163	22.0	31	
(Days On)	MCF	D BOPD	Apr	10,759	0.0	30	8,791	36.0	30	
7 Day Avg	23	8 16.3	May	8,725	9.0	26	10,127	10.0	31	
30 Day Avg	21	6 1.6	Jun	8,340	1.0	22.9	4,265	14.0	22	
60 Day Avg	21	0 1.1	Jul	9,955	67.0	31	5,685	26.0	31	
3 Mo Avg	20	4 1.0	Aug	9,764	54.0	31	6,049	12.0	31	
6 Mo Avg	18	8 0.7	Sept	10,555	106.0	30	4,154	5.0	30	
12 MoAvg	23	3 0.8	Oct	10,887	9.0	31	7,043	12.0	31	
			Nov	9,166	17.0	30	5,380	60.0	30	
<u>Volumes</u>			Dec	5,980	0.0	31	6,328	16.0	31	
(Days in Mo	nth) MCF	D BOPD	Total	117,110	273.0		83,200	281.0		
30 Day Avg	21	6 1.6	iotai	117,110	2/3.0		63,200	201.0		
60 Day Avg	21	0 1.1					Total Parket		1	
3 Mo Avg	20	4 1.0					Pri	nt Form		
6 Mo Avg	19	0 0.7								
12 Mo Avg	22	8 0.8					-Exit Vo	lumes D	ata:	

2/12/98

Package Preparation **Volume Data**

DPNo:=1807 Form: DK

Supt: 60 KEN RAYBON

FF: 335 LARY BYARS

MS: 318 J.R TRUJILLO

Pipeline: EPNG

Dual: Yes Plunger: No

Compressor:

No

<u>Owr</u>	nership (No	Trust)		<u>Prior Year</u>				Current Year		
GWI: 6	<u>Gas</u> 50.2270%	<u>Oil</u> 60.2270%		MCF/M	ВОРМ	<u>Days</u> <u>On</u>	MCF/M	ВОРМ	<u>Days</u> <u>Or</u>	
GNI: 4	19.8477%	49.8477%	Jan	3,256	0.0	22.4	2,085	0.0	31	
a state of			Feb	2,349	0.0	29	591	0.0	28	
Volumes			Mar	1,335	0.0	31	418	0.0	31	
(Days On)	MCF	D BOPD	Apr	2,125	0.0	30	0	0.0	28.2	
7 Day Avg	11:	2 0.0	May	2,190	0.0	28	2,077	0.0	13.1	
30 Day Avg	47	0.0	Jun	1,628	0.0	22.9	1,252	0.0	8.4.	
60 Day Avg	31	0.0	Jul	938	0.0	31	1,154	0.0	31	
3 Mo Avg	11	0.0	Aug	2,400	0.0	31	582	0.0	31	
6 Mo Avg	21	0.0	Sept	720	0.0	30	1,064	0.0	30	
12 MoAvg	32	0.0	Oct	2,298	0.0	31	2	0.0	31	
			Nov	1,504	0.0	30	534	0.0	30	
Volumes			Dec	1,574	0.0	31	445	0.0	31	
(Days in Mor			Total	22,317	0.0		10,204	0.0		
30 Day Avg	47	0.0								
60 Day Avg	31	0.0								
3 Mo Avg	11	0.0					Pni	nt Form		
6 Mo Avg	21	0.0								
12 Mo Avg	28	3 0.0					Exit Vo	lumes L	Jata	

2/12/98

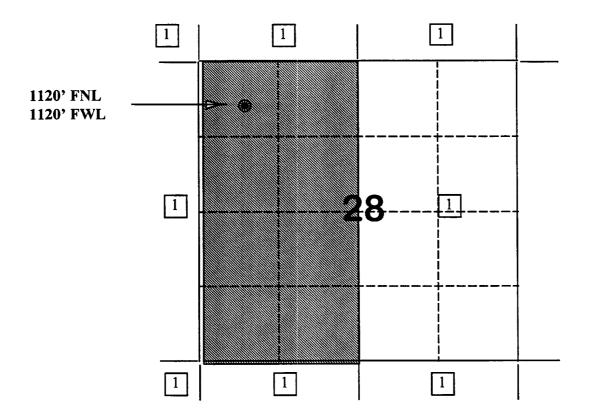
BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 29-7 Unit #124M

OFFSET OPERATOR/OWNER PLAT

Mesaverde / Dakota Formations Commingle Well

Township 29 North, Range 7 West



1) Burlington Resources

81A 😂		44F	92 ₁₂	9 R	1	
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SAN JUAN 29-7 #124M 12/3/97 SEC. 28, T29N, R7W 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. 11629 ORDER NO. R-10697

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 29-7 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 8th 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 29-7 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 29-7 Unit which encompasses some 22,500 acres in Township 29 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (5) Within the San Juan 29-7 Unit, the applicant currently operates fifty-five (55) Basin-Dakota Gas Pool wells, one hundred thirty-one (131) Blanco-Mesaverde Gas Pool wells, thirteen (13) Blanco-Pictured Cliffs and South Blanco-Pictured Cliffs Gas Pool wells, and forty-nine (49) 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 29-7 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 29-7 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 29-7 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 29-7 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 29-7 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 245 MMCFG and 76 MMCFG, respectively;
 - the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 218 MCFGD and 238 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 29-7 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 29-7 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 was approximately 3.209 psi and 1.148 psi, respectively; and,
 - b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations is approximately 952 psi and 655 psi, respectively.

- (10) There is sufficient pressure data available within the San Juan 29-7 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 commingied wells within the San Juan 29-7 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 29-7 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 29-7 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 29-7 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 29-7
 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 29-7 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 29-7 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 29-7 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 29-7 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 29-7 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 29-7 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 29-7 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 29-7 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 nereinabove designated.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LeMAY

Directo

S E A L