DISTRICT I

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

DISTRICT III

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

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 87505-6429

APPLICATION FOR DOWNHOLE COMMINGLING

Form C-107-A New 3-12-96

APPROVAL PROCESS :

X Administrative ___Hearing

EXISTING WELLBORE

__YES _xNO

rator IN JUAN 29-7 UNIT	66A F 22	29N-7W	Rio Arriba
10	Well No. Unit L	tr Sec - Twp - Rge	County Unit Lease Types: (check 1 or more)
GRID NO14538 Property C	ade 7465 API NO 30-0		•••
The following facts are submitted n support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319	DEGERMED	Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	will be supplied upon completion	DEVELVE	will be supplied upon completion
3. Type of production (Oil or Gas)	gas	uu jun - 3 1357	gas
4. Method of Production (Flowing or Artificial Lift)	flowing	OIL CON. DIV.	flowing
5. Bottomhole Pressure	(Current) a. 621 psi (see attachment)	a.	a. 470 psi (see attachment)
Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing:	(Original)	b.	b. 2173 psi (see attachment)
Measured Current All Gas Zones: Estimated or Measured Original	b. 1250 psi (see attachment)	6 .	S. 2110 por (occ distance)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1155		BTU 1027
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	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	range.		
* If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: % Gas: % will be supplied upon completion	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
If allocation formula is based attachments with supporting definitions.	upon something other than cur	rent or past production, or is bad providing rate projections or ot	ased upon some other method, her required data.
			Van u Na
Will cross-flow occur? _x production be recovered, and v	Yes No If yes, are fluids on will the allocation formula be reli	compatible, will the formations ablex YesNo (If No,	not be damaged, will any cross attach explanation)
2. Are all produced fluids from all	commingled zones compatible w	rith each other?x_Yes	₋ No
3. Will the value of production be o	decreased by commingling?	Yes _X_ No (If Yes, attach ex	planation) blic Lands or the United States
4. If this well is on, or communitie of Land Management has been r	red with, state or tederal lands notified in writing of this applicat	ionX_Yes No	one Lands of the Chited States
5. NMOCD Reference Cases for Re			
6. ATTACHMENTS: * C-102 for each zone * Production curve for * For zones with no po * Data to support alloc * Notification list of all * Notification list of wo * Any additional stater	to be commingled showing its speach zone for at least one year. oduction history, estimated production method or formula. offset operators. orking, overriding, and royalty in nents, data, or documents requi	pacing unit and acreage dedication (If not available, attach explanations) (Identify the second supporting data the second supporting data the supporting data the support comming support com	on. tion.) i.
hereby certify that the inform	nation above is true and cor	mplete to the best of my know	wledge and belief.
SIGNATURE Lean (1/2)	iauon above is u ue anu coi	ilbiere ro aic pear of my mie	Modge and comme

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

District i PO Box 1986, Hobbs, AM \$8241-1986 District ii PO Drawer OD, Artena, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District iV PO Box 2008. Santa Fe. NM 87504-2008

State of New Mexico Energy, Minerals & Natural Resources Department

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

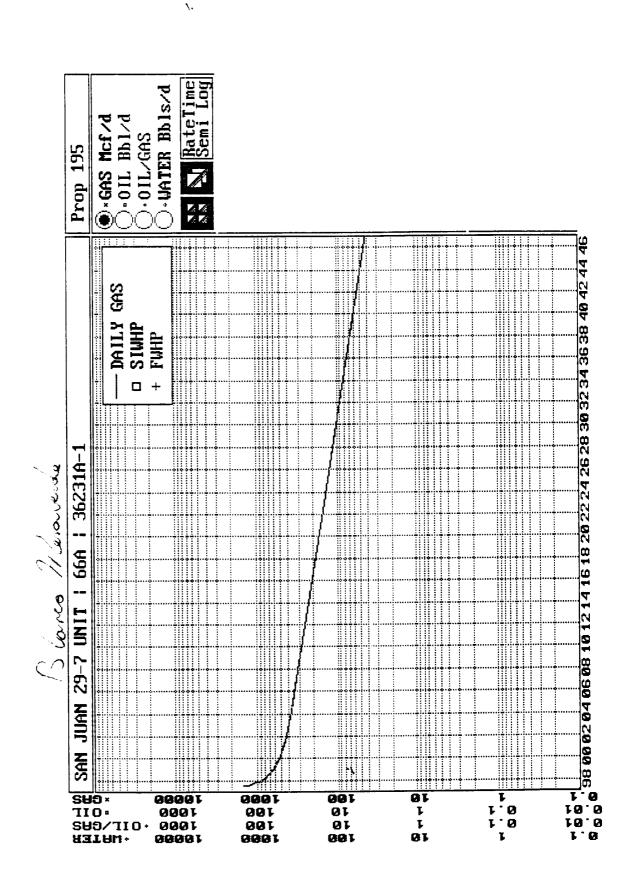
RECEIVE Revised February 21 Submit to Appropriate District

57 July 27 All 9 Substance - 4 For Lease - 3 070 FALLE MANENDED RE

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' Preparty Code			_		erty Name				· Well Number
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				10 Surta	ice Location				
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RateTime Semi Log J-UATER Bbls/d • CAS Mcf /d)-OIL/GAS **Prop 261** 98 00 02 04 06 08 10 12 14 16 18 20 22 24 26 28 30 32 34 36 38 40 42 44 46 GAS DAILY SIWHP FWHP **-** + 1 66A 1 34535A-1 *I-I--I--JUAN 29-7 UNIT) Saver • ******* SAN ĪŅ 01 01 001 1 1.0 1.0 1. I. SUO × 10000 1000 100 OIL/CAS 1000 - UATER 1000 - UATER 100 1999 661 81 19999

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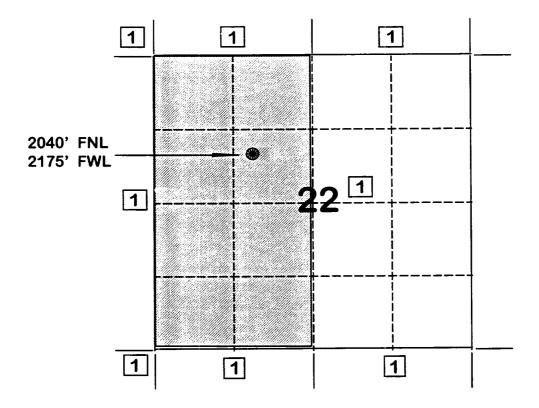


BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 29-7 Unit #66A OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingle Well

Township 29 North, Range 7 West



1) Burlington Resources Oil and Gas Company

OPR008M1 S001 O008 CHROMA	TOGKAFII TEDI PATA DEKEMA
FUNCTION (A,C,D,I) I MP NUMBER 9335 EFFECTIVE DATE 19960801	** DATA AT TEST PRESSURE UNLESS NOTED ** 5 SAN JUAN 29-7 UNIT 65A
MP TYPE CODE 10	GAS METER - WELLHEAD SALES
SAMPLE TYPE CODE (GAS,LIQ,BTU SAMPLE DATE	OAS BTU/CF 19960529 (AT 14.73 PSIG) WET 1026.831 DRY 1045.000
SAMPLE LINE PRESSURE (PSIG) SAMPLE LINE TEMPERATURE (DEG	F) RTI/CE
TEST DATE TEST PRESSURE (PSIG) TEST TEMPERATURE (DEG F) TEST LIFE (MONTHS)	BTU/CF 14.730 WET _1026.831 DRY _1045.000 VAPOR FACTOR
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OPROOSM1 SOOO OOOS CHROMATO	GRAPH TEST MAIN SCREEN 14:54:02.8 05/18/9
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SULPHER GRAINS / 100 CU FT ____

24=HELP PA1=TERMINATE

03=MAIN SCREEN B MY JOB NUM LU #2

TOTALS 100.00 3.5499

HEXANE PLUS

HEPTANE PLUS

HEXANE

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0.2356

San Juan 29-7 Unit #66A 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 COND. OR 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) 600 600 600 600 600 600 600 6	GAS GRAVITY COND. OR 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)	0.601 C 0.10 1.61 0.00 2.375 7973 60 196 0	
MV-Original	<u>DK-Original</u>		
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Page No.: 1
Print Time: Tue May 20 09:38:25 1997
Property ID: 2116
Property Name: SAN JUAN 29-7 UNIT | 65A | 69351-1
Table Name: K:\ARIES\RR98PDP\TEST.DBF

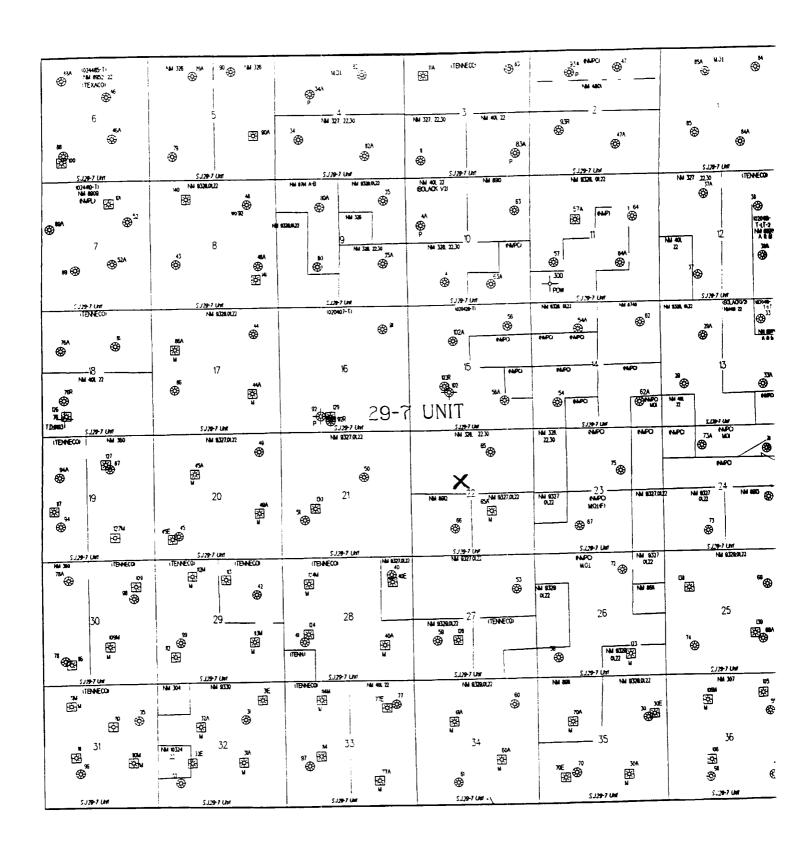
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12/14/58	118000	812.0	
02/22/59	177000	802.0	
09/06/60	472000	717.0	
03/05/61	570000	766.0	
12/15/61	701000	766.0	
09/21/62	864000	697.0	
10/18/63	1079000	706.0	
02/07/64	1119000	706.0	
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03/03/70	2274266		
03/30/71	2460041 2726710	560.0	
06/12/72 07/09/73	2971528	481.0 442.0	
08/21/74	3197270	444.0	
04/20/76	3503451	450.0	
05/16/78	3884118	424.0	
07/29/80	4210673	450.0	
05/13/82	4458288	494.0	
08/21/84	4660725	515.0	
10/03/86	4855490	532.0	
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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:
 - 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;
 - c) 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 commingled 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 hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LeMAY

Director/

S E A L