#### **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**

APPLICATION FOR DOWNHOLE COMMINGLING

2040 S. Pacheco Santa Fe, New Mexico 87505-6429 Form C-107-A New 3-12-96

**APPROVAL PROCESS:** 

\_X\_ Administrative \_\_\_Hearing

**EXISTING WELLBORE** 

\_ YES \_xNO

#### **Burlington Resources Oil & Gas Company** PO Box 4289, Farmington, NM 87499 Address **SAN JUAN 29-7 UNIT** 81A O 18--29N-7W Rio Arriba Lease Well No. Unit Ltr. - Sec - Twp - Rge County Spacing Unit Lease Types: (check 1 or more) OGRID NO. \_14538\_\_\_ \_\_ Property Code \_\_7465\_\_ \_\_\_\_ API NO\_30-039-25642\_\_Federal \_\_X\_\_\_ \_ , State \_ \_(and/or) Fee \_ The following facts are submitted in support of downhole commingling: Intermediate Zone Upper 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 4. Method of Production (Flowing or Artificial Lift) flowing flowing <del>COM. D</del>I (Current) 5. Bottomhole Pressure a. 905 psi (see attachment) a. 520 psi (see attachment) 的物。台 Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current (Original) b. 1247 psi (see attachment) b. 3231 psi (see attachment) b. All Gas Zones: Estimated or Measured Original 6. Oil Gravity (°API) or Gas BTU Content **BTU 1179** BTU 1129 7. Producing or Shut-In? shut-in shut-in Production Marginal? (yes or no) yes If Shut-In and oil/gas/water rates of last production Date: n/a Date: Date: n/a Rates: Rates Rates Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data

District I PO Box 1980, Hobbs, NM 88241-1980 PO Drawer DD, Artena, NM 88211-0719

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-10 Revised February 21, 199

Instructions on bac. Submit to Appropriate District Offic

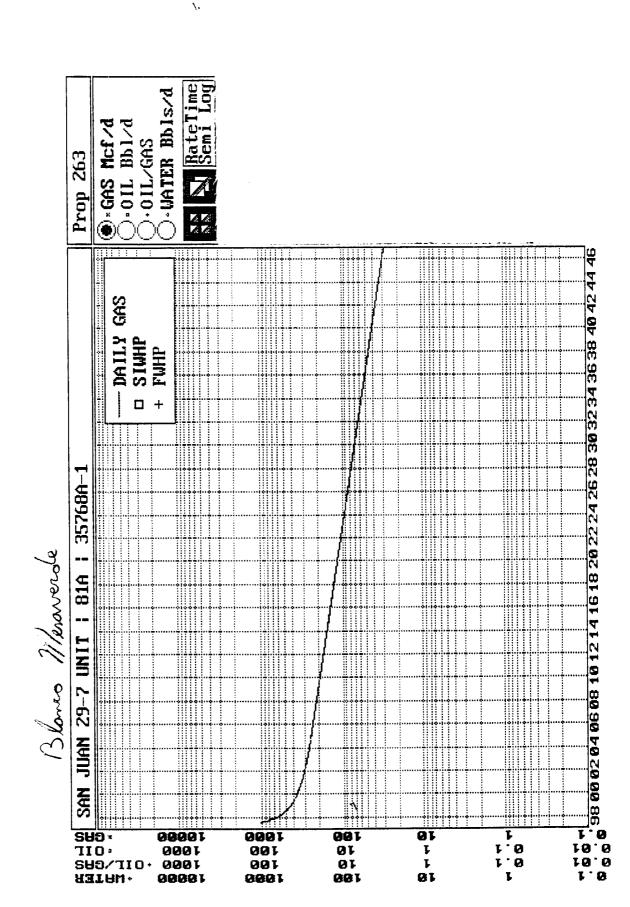
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RateTime Semi Log J-WATER Bbls/d \*GAS Mcf/d 0-0IL Bb1/d ).OIL/GAS **Prop 264** 10 12 14 16 18 20 22 24 26 28 30 32 34 36 38 40 42 44 46 GAS DAILY SIWHP FWHP .161-1-6-1 **-** + 34305A-÷1+++-1 \*\*\*\*\* \*\*\*\* **81**A \$1000° 29-7 UNIT 98 00 02 04 06 08 \*\*\* JUAN SAN 1 1.6 10.6 10.6 SUD× 40 10000 1000 00 l 1.0 1.0 ·OIF 40 1000 100 Ţ 1000 · OIF\CHR 100 91 Ţ + MULEE 19999 1999 400 01

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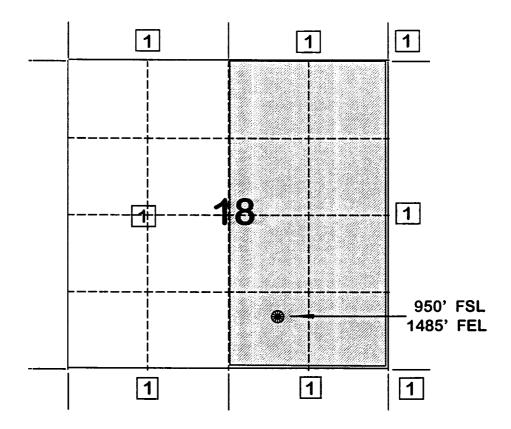


## BURLINGTON RESOURCES OIL AND GAS COMPANY

## San Juan 29-7 Unit #81A OFFSET OPERATOR \ OWNER PLAT

## Mesaverde/Dakota Formations Commingle Well

Township 29 North, Range 7 West



1) Burlington Resources Oil and Gas Company

	MP NUMBER EFFECTIVE DATE REGION CD	95479 19960701 42	SAN JUAN	AT TEST PRESSURE UNLESS NOTED ** 29-7 UNIT 126 R - WELLHEAD SALES
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## San Juan 29-7 Unit #81A Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method

Version 1.0 3/13/94

Mesaverde	Dakota			
<u>MV-Current</u>	<u>DK-Current</u>			
GAS GRAVITY 0.692  COND. OR MISC. (C/M) C  %N2 0.28  %CO2 0.95  %H2S 0.00  DIAMETER (IN) 2.375  DEPTH (FT) 5451  SURFACE TEMPERATURE (DEG F) 60  BOTTOMHOLE TEMPERATURE (DEG F) 147  FLOWRATE (MCFPD) 0  SURFACE PRESSURE (PSIA) 454  BOTTOMHOLE PRESSURE (PSIA) 520.1	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)	0.659 C 0.55 0.75 0.00 2.375 8006 60 196 0 750		
<u>MV-Original</u>	DK-Original			
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07/31/56	223000	869.0	
07/23/57	275000	839.0	
05/22/58	316000	841.0	
03/29/59	357000	763.0	
09/06/60	445000	822.0	
10/05/61	498000	799.0	
03/13/62	527000	752.0	
02/12/63	562000	807.0	
07/16/64	618000	752.0	
02/25/65	649000	657.0	
02/28/66	699000	764.0	
03/03/67	764000	716.0	
03/05/68	821000	692.0	
08/15/69	904000	639.0	
03/03/70	935000	634.0	
06/23/70	945533	825.0	
12/09/70	1053565	643.0	
03/30/71	1104312	597.0	
06/12/72	1275840	527.0	
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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:
    - 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;
    - 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 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

S E A L