DISTRICT

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

DISTRICT II

SIGNATURE_

TYPE OR PRINT NAME _Gaye White ___

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

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 New 3-12-96

APPROVAL PROCESS:

__Administrative ___Hearing

EXISTING WELLBORE

DISTRICT III APPLICATION FOR DOWNHOLE COMMINGLING 1000 Rio Brazos Rd, Aztec, NM 87410-1693 _X__ YES ___ NO PO Box 4289, Farmington, NM 87499 **Burlington Resources Oil & Gas Company** K-11-32N-7W San Juan 34 Allison Unit County Well No. Unit Ltr. - Sec - Twp - Rge Lease _(and/or) Fee __X __ Property Code __6784_ API NO. 30-045-28591 Federal __X____, State _ OGRID NO. 14538 Intermediate Zone The following facts are submitted in support of downhole commingling: Upper Zone Basin Dakota - 71599 Pool Name and Pool Code Blanco Mesaverde - 72319 8068-8170 2. Top and Bottom of Pay Section (Perforations) Will be supplied upon completion Gas 3. Type of production (Oil or Gas) Gas 4. Method of Production (Flowing or Artificial Lift) Flowing Flowing (Current) a. 911 psi (estimated) a. 629 psi (see attachment) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current (Original) b 1350 psi (estimated) b. 1391psi (see attachment) MAI 2 8 1597 All Gas Zones: Estimated or Measured Original **BTU 946** 6. Oil Gravity (°API) or Gas BTU Content **RTIJ 975** producing 7. Producing or Shut-In? producina No Production Marginal? (yes or no) ves If Shut-In and oil/gas/water rates of last production Date: New zone (See attachment) Date: New zone (See attachment) Date: n/a Rates Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data Date: n/a * If Producing, give data and oil/gas/water water of recent test (within 60 days) Date: Date: n/a Rates Rates: Gas: 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: If allocation formula is based upon something other thanurrent 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. ___Yes __X_No __Yes __X_No _X_Yes ___No 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? Have all offset operators been given written notice of the proposed downhole commingling? 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) 11. Will cross-flow occur? 12. Are all produced fluids from all commingled zones compatible with each other? Yes 13. Will the value of production be decreased by commingling? ___ Yes _x__ 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 nis No 15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). 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.

____TITLE_ Production Engineer ___

___ TELEPHONE NO. (505__) 326-9700

____DATE___5-27-97____

District Office Size Lass - 4 comes Fee Lass - 3 copess

State of New Mexico Energy, Minerais and Natural Resources Department

Form C-102 Revised 1-1-29

OIL CONSERVATION DIVISION

P.O. Box 2088

Sama Fe, New Mexico 87504-2088

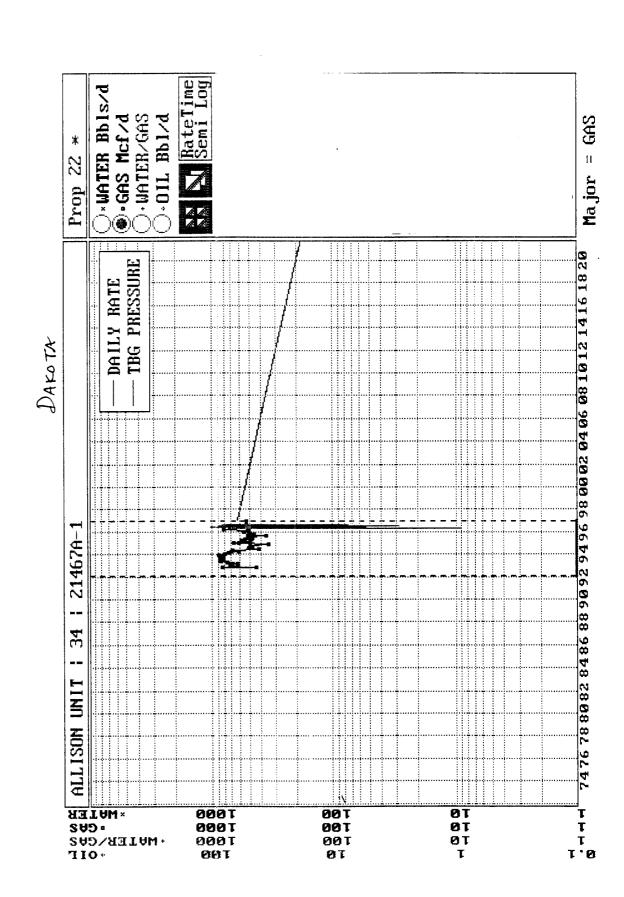
DISTRICT II
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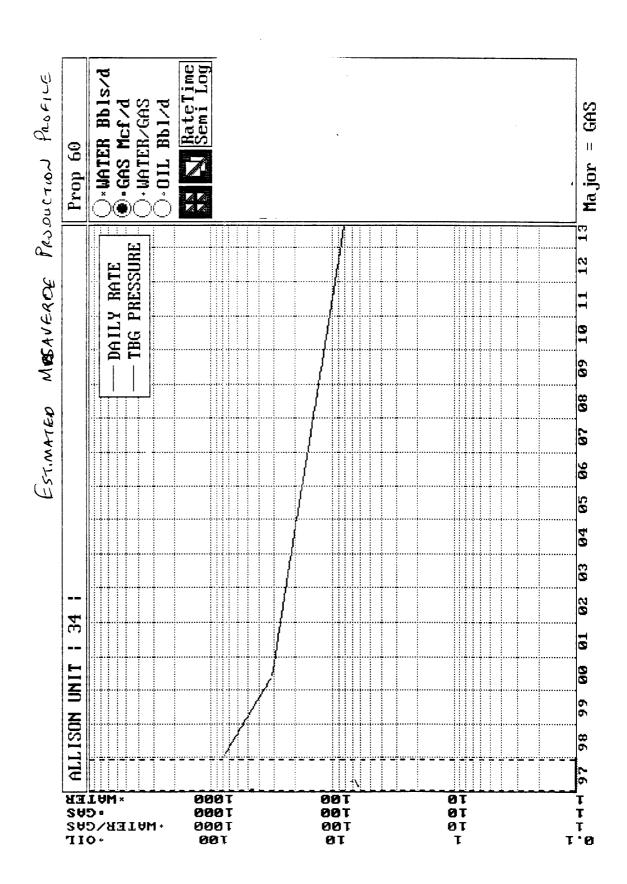
DISTRICT I P.O. Box 1980, Hobbs, NM 88240

DISTRICT III

WELL LOCATION AND ACREAGE DEDICATION PLAT

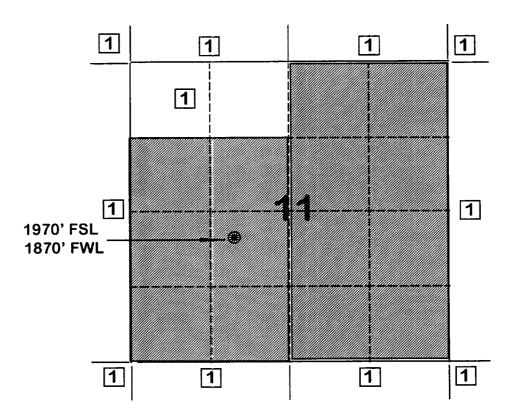
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2. If more than one seams of different conversities in dedicated to the well, have the inservat of all convert been conscilidated by communications, force-pounds, de.? Yes	O					1				377.66	Acres
Position Meridian oil Inc. Company 9-25-91 Data SURVEYOR CERTIFICATION 1 hereby certify that the well location on that plat was plotted from field a casual survey made by me or un supervision, and that the same is to correct to the best of my benevied belief. 9-24-91 Data Surveyor Signature Signatur	986.70'	3. If more a uniterated if answer at this form if No allowab or until a m	han one lease of one, force-pooling, Yes "no" list the own necessary. the will be amaging the standard unit. Order#	different ownership stc.? No if it is not seed to the well ustal a distributing such its - 2046	is dedicated to the saver is "yes" by prome which have been a NOT sho cal	pe of consolidation pe of consolidation been consolidated (by or peroved by the Division E: reissue w corrected culations.	Initizat Unitizat Land (Un more construction) ded to ded to ded footage	ion res ada di	forced positive of my finance	TOR CERTIFIC certify that the in true and control of the state and control of the state and control of the state of the st	information in the second seco
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BURLINGTON RESOURCES OIL AND GAS COMPANY

Allison Unit #34 OFFSET OPERATOR \ OWNER PLAT Nonstandard Dedication Covering Lots 2, 5, 6, 7 W/2 SE/4, SW/4 containing 377.66 acres Mesaverde/Dakota Formations Commingle Well Township 32 North, Range 7 West



1) Burlington Resources Oil and Gas Company

DAKOTA

____Page No.: 5
Print Time: Tue May 13 14:43:48 1997

Property ID: 22
Property Name: ALLISON UNIT | 34 | 21467A-1 Table Name: K:\ARIES\RR97PDP\TEST.DBF

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FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD

VERSION 1.0 3/13/94

GAS GRAVITY	0.608
COND. OR MISC. (C/M)	С
%N2	0.13
%CO2	5.23
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	8120
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	225
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1170
BOTTOMHOLE PRESSURE (PSIA)	1390.9

ALLISON UNIT #34 - DAKOTA - ORIGINAL

FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD

VERSION 1.0 3/13/94

GAS GRAVITY	0.608
COND. OR MISC. (C/M)	С
%N2	0.13
%CO2	5.23
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	8120
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	225
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	534
BOTTOMHOLE PRESSURE (PSIA)	628.7

ALLISON UNIT #34 DAKOTA - CURRENT

Allison Unit #34 Mesaverde Initial Pressure Estimation

LEASE Allison Unit Allison Unit Allison Unit Average Pressure Dre	WELL_ID 8 13 25 op	LOCATION 032N007W15H 032N007W12M 032N006W19L	STATE NM NM CO	SPUD_DATE 5/18/55 3/31/58 12/27/62	1352 1327 1282 9.3 psi/year	← Bothsmhol pussures
Initial Bottomhole Pressure Pressure Drop / Year Years Additional Pressure Drop Estimated 1997 Initial Pressure		1350 9.33 47 439 911		(yr * 47 yrs) i - 439 psi)		

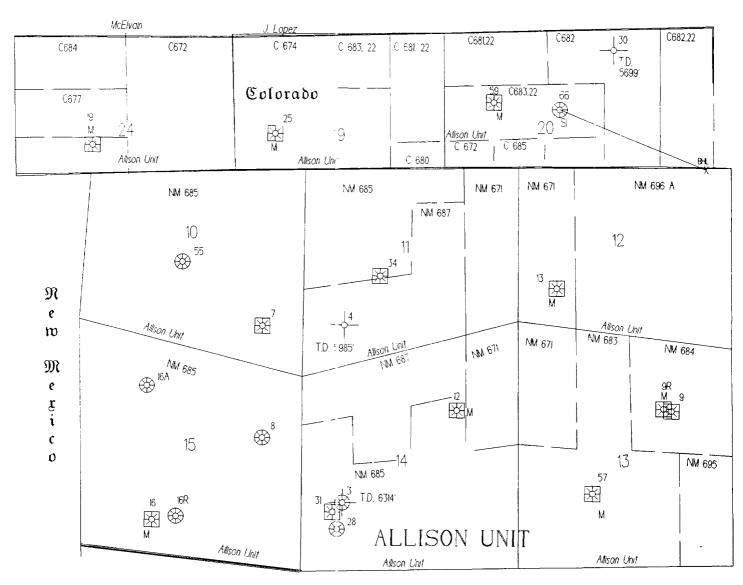
PF6 - RETURNS TO ANNUAL DISPLAY
PF10 - HELP INFORMATION
00/00/00 00:00:00:0
PF3 - TRANSFER TO UPDATE
PF9 - DISPLAY MONTHLY INJECTIC
PRS 05/03/97

B MY JOB NUM LU #2

ALLISON UNIT #34

Section II. T32N. R7W

Blanco Mesaverde / Basin Dakota



R-07-₩

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. 10743 Order No. R-9918

APPLICATION OF MERIDIAN OIL INC. FOR DOWNHOLE COMMINGLING AND FOR AN ADMINISTRATIVE DOWNHOLE COMMINGLING PROCEDURE WITHIN THE ALLISON UNIT AREA, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on June 17, 1993, at Santa Fe, New Mexico, before Examiner David R. Catanach.

NOW, on this 6th day of July, 1993, 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, Meridian Oil Inc., seeks approval to commingle gas production from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison Unit Well No. 9R located 1720 feet from the North line and 1655 feet from the East line (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (3) The applicant further seeks the adoption of an administrative procedure for authorizing the downhole commingling of Blanco-Mesaverde and Basin-Dakota Pool production within certain existing and subsequently drilled wells in its Allison Unit Area, San Juan County, New Mexico, without additional notice to each affected interest owner within the Unit Area.

- (4) The Allison Unit Well No. 9R is to be drilled as a replacement well for the Allison Unit Well No. 9 which is located 1765 feet from the North line and 1500 feet from the East line (Unit G) of Section 13 and which is currently completed in and producing from the Basin-Dakota Pool.
- (5) The Allison Unit Well No. 9 was drilled in 1955 and has cumulatively recovered some 4.4 BCF of gas from the Basin-Dakota Pool.
- (6) Due to the age and mechanical condition of the Allison Unit Well No. 9, the applicant has estimated that it will not recover some 1.7 BCF of gas in the Basin-Dakota Pool underlying the E/2 of Section 13.
- (7) Applicant's testimony indicates that due to economics, the Allison Unit Well No. 9R cannot be drilled solely to recover gas reserves in the Basin-Dakota Pool.
- (8) The applicant expects to encounter marginal production only from the Blanco-Mesaverde Pool.
- (9) The proposed downhole commingling is necessary in order for the applicant to economically recover Basin-Dakota and Blanco-Mesaverde Pool reserves underlying the E/2 of Section 13.
- (10) The Allison Unit is a Federal exploratory unit initially comprising some 11,705 acres in New Mexico and some 2,069 acres in Colorado. Within New Mexico, the unit comprises portions of Township 32 North, Ranges 6 and 7 West, NMPM, San Juan County. The unit was formed in 1950 and is currently operated by Meridian Oil Inc.
- (11) The evidence and testimony presented indicates that the Basin-Dakota and Blanco-Mesaverde Pools have both been substantially developed within the Allison Unit.
- (12) The applicant has identified numerous Mesaverde and Dakota well locations within the Allison Unit which by virtue of marginal gas reserves and resulting poor economics cannot be economically drilled and produced as stand alone units.
- (13) The current well economics and projected Dakota and Mesaverde gas reserves underlying these respective tracts virtually assure that these wells must be downhole commingled in order to meet the economic criteria for drilling.
- (14) The applicant expects initial producing rates from both the Mesaverde and Dakota formations to be fairly marginal in nature.

- (15) The applicant further demonstrated through its evidence and testimony that within the wells it proposes or will propose to commingle within the Unit Area:
 - a) there will be no crossflow between the two commingled pools;
 - b) neither commingled zone exposes the other to damage by produced liquids;
 - c) the fluids from each zone are compatible with the other;
 - d) the bottomhole pressure of the lower pressure zone should not be less than 50 percent of the bottomhole pressure of the higher pressure zone adjusted to a common datum; and,
 - e) the value of the commingled production is not less than the sum of the values of the individual production.
- (16) The Dakota and Mesaverde Participating Areas within the Allison Unit are not common.
- (17) By virtue of different Participating Areas, the interest ownership between the Dakota and Mesaverde formations within any given wellbore is not common.
- (18) Applicant's Exhibit No. 2 in this case is a list of three hundred and fifty four (354) interest owners in the Dakota and Mesaverde Participating Areas within the Allison Unit. All such interest owners were notified of the application in this case.
- (19) Rule No. 303(C) of the Division Rules and Regulations provides that administrative approval for downhole commingling may be granted provided that the interest ownership, including working, royalty and overriding royalty interest, is common among the commingled zones.
- (20) Applicant's proposed administrative procedure would provide for Division approval to downhole commingle wells in the Allison Unit Area without hearing, and without the requirement that each interest owner in the Dakota and Mesaverde Participating Areas be notified of such commingling.
- (21) The downhole commingling of wells within the Allison Unit Area will benefit working, royalty and overriding royalty interest owners. In addition, the downhole commingling of wells within the Allison Unit Area should not violate the correlative rights of any interest owner.

- (22) evidence in this case indicates that. to each interest owner within the Dakota an Aesaverde Participating Areas of subsequent downhole comminglings within the Allison Unit is unnecessary and is an excessive burden on the applicant.
- (23) No interest owner and/or offset operator appeared at the hearing in opposition to the application.
- (24) An administrative procedure should be established within the Allison Unit for obtaining approval for subsequently downhole commingled wells without notice to Unit interest owners and hearing, provided however that, all provisions contained within Rule No. 303(C) of the Division Rules and Regulations, with the exception of Part 1 (b)(v), are fully complied with.
- (25) The proposed administrative procedure for obtaining approval for downhole commingling will allow the applicant the opportunity to recover additional gas reserves from the Allison Unit Area which may otherwise not be recovered, thereby preventing waste, and will not violate correlative rights.
- (26) In the interest of prevention of waste and protection of correlative rights, the proposed downhole commingling within the Allison Unit Well No. 9R should be approved.
- (27) The applicant should consult with the supervisor of the Aztec District Office of the Division subsequent to the completion of the subject well in order to determine a proper allocation of production.
- (28) The operator should immediately notify the supervisor of the Aztec district office of the Division any time the subject well has been shut-in for seven consecutive days and shall concurrently present, to the Division, a plan for remedial action.

IT IS THEREFORE ORDERED THAT:

- (1) The applicant, Meridian Oil Inc., is hereby authorized to commingle gas production from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison Unit Well No. 9R located 1720 feet from the North line and 1655 feet from the East line (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (2) The applicant shall consult with the supervisor of the Aztec district office of the Division subsequent to the completion of the subject well in order to determine a proper allocation of production.

UL- 7-93 WED 12:47 OIL CONSERVATION DIV P

- (3) The operator shall immediately notify the supervisor of the Aztec district office of the Division any time the subject well has been shut-in for seven consecutive days and shall concurrently present, to the Division, a plan for remedial action.
- (4) An administrative procedure for obtaining approval to downhole commingle wells within the Allison Unit, located in portions of Township 32 North, Ranges 6 and 7 West, NMPM, San Juan County, New Mexico, is hereby established.
- (5) In order to obtain Division authorization to downhole commingle wells within the Allison Unit, the applicant shall file an application with the Santa Fe and Aztec Offices of the Division. Such application shall contain all of 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 Dakota and Mesaverde Participating Areas in the Allison Unit of such proposed commingling. In addition, the application shall contain evidence that all offset operators and the United States Bureau of Land Management (BLM) have been notified of the proposed commingling.
- (6) Jurisdiction is hereby 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

SEAL