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

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

OIL CONSERVATION DIVISION

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

X Administrative ___Hearing

EXISTING WELLBORE

APPLICATION FOR DOWNHOLE COMMINGLING

___YES __x_NO

	47 M O	8-32N-06W	San Juan
50	Well No. Unit Lt	tr Sec - Twp - Rge Space	County ing Unit Lease Types: (check 1 or more)
RID NO14538 Property Cod	le6784 API NO30-045		
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower
			Lower Zone
I. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
. Top and Bottom of Pay Section (Perforations)	will be supplied upon completion	Manage Control of the	will be supplied upon completi
3. Type of production (Oil or Gas)	gas	DECEIVED	gas
4. Method of Production (Flowing or Artificial Lift)	flowing	JUN 2 (4000	flowing
5. Bottomhole Pressure	(Current)	3011 2 4 1998	a. 674 psi (see attachment)
Oil Zones - Artificial Lift:	a. 562 psi (see attachment)	AUL GOM, DUW	a. 574 psi (see attachment)
Estimated Current Gas & Oil - Flowing: Measured Current	(Original) b. 1331 psi (see attachment)	b. 57	b. 3404 psi (see attachment)
Ail Gas Zones: Estimated or Measured Original	b. 1331 psi (see attachment)		, , , , , , , , , , ,
5. Oil Gravity (API) or Gas BTU Content	BTU 960		BTU 993
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	Date:	Date: n/a
Note: For new zones with no production history, applicant shall be required to attach production satisfacts and supporting data	Rates:	Rates:	Rates:
If Producing, give data and	Date: n/a	Date:	Date: n/a
oli/gas/water water of recent test (within 60 days)	Rates:	Rates:	Rates:
8. Fixed Percentage Allocation	Oil: Gas:	Oil: Gas:	Oil: Gas: %
Formula -% for each zone (total of %'s to equal 100%)	% % will be supplied upon completion	* *	% % will be supplied upon completion
If allocation formula is based u attachments with supporting date. Are all working, overriding, and recognitions.			•
ir not, nave all working, overridir Have all offset operators been gi	oyalty interests identical in all com ig, and royalty interests been notifi ven written notice of the proposed	downhole commingling?	YesNo X_YesNo
I. Will cross-flow occur? _x_ production be recovered, and w	Yes No If yes, are fluids co ill the allocation formula be reliable	empatible, will the formations no ex YesNo (If No, att	t be damaged, will any cross- ach explanation)
. Are all produced fluids from all c	ommingled zones compatible with	each other?x_Yes N	lo
3. Will the value of production be de			•
I. If this well is on, or communitize Land Management has been notif	ed with, state or federal lands, eith led in writing of this application	ner the Commissioner of Public L X_Yes No	ands or the United States Bur
5. NMOCD Reference Cases for Rule	303(D) Exceptions: ORDER NO(S	S)Reference OrderR-9918	attached
	be commingled showing its space sech zone for at least one year. (If section history, estimated production method or formula. offset operators. rking, overriding, and royalty interests.	ing unit and acreage dedication. not available, attach explanation. tion rates and supporting data. ests for uncommon interest cases to support commingling.	
* Any additional statem			
	·		
* Any additional statements the information of the statement of the statem	tion above is true and comple	ete to the best of my knowled	dge and belief.

TYPE OR PRINT NAME <u>Sean Woolverton</u> TELEPHONE NO. (505) 326-9700

District I PO Bdx 1980, Hobbs, NM 88241-1980

District II PO Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Rox 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-102 Revised February 21, 1994 Instructions on back

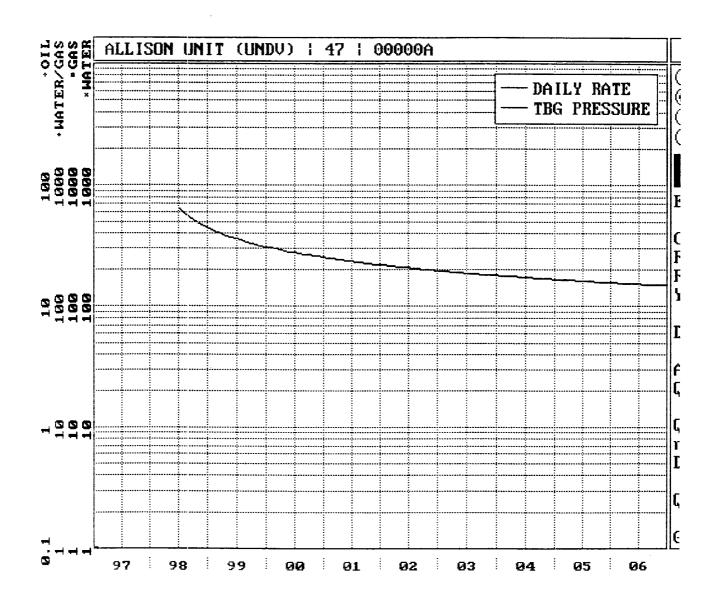
Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

Certificate Number

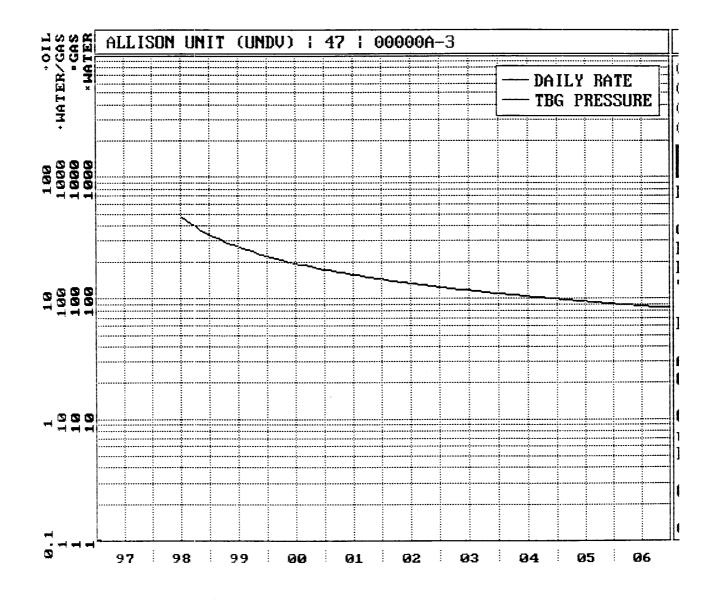
AMENDED REPORT

		MM 87504-2		I UCVI.	TON AND) <u>V</u> CI	REAGE DED	тс л :	TTON DI	٨٣			
*,	API Numbe		1	*Pool Cod			TIEAGE DED	TCA	Pool Nam				
¹Property	Code							/ell Number 47	,				
'OGRID	No.	*Operator Name *Ele				Elevation 6521							
					¹⁰ Surfac		ocation						
UL or lot no.	Section	Township	Range	Lot Idn	Feet from t		North/South line	Fe	et from the	East/We	st line	Count	ſу
M	8	32N	6W		600		South		790	We	st	SAN J	IUAN
			ttom		ocation	ı If	Different	Fro	om Surf	ace			
UL or lot no.	Section	Township	Range	Lot Ion	Feet from t	the	North/South line	Fe	et from the	East/We	est line	Count	:у
Dedicated Acres		¹³ Joint or Infil	1 ¹⁴ Consi	olidation Code	15 Order No	j.		<u> </u>		<u> </u>			
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1321.98		FEE -		8	IN JUNG			1159.62' 54	Signatur Printed Title Date	Name EYOR I		IFICAT:	I ON
NM-04	207	NM-02	<u>-</u> 1207			2698	74:	2724.48'	was plotted for under my s correct to th	rom field no Lupervision, a e best of my	tes of actiond that the belief.	ual surveys mad e same is true	e by m

Allison Unit #47 Expected Production Curve Blanco Mesaverde



Allison Unit #47 Expected Production Curve Basin Dakota



Allison Unit #47

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

Dakota				
DK-Current				
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.36 %CO2 1.75 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 673.8				
DK-Original				
GAS GRAVITY 0.585 COND. OR MISC. (C/M) C %N2 0.36 %CO2 1.75 %H2S 0				

Page No.: 5

Print Time: Mon Dec 29 14:00:03 1997

Property ID: 2422

Property Name: ALLISON UNIT | 57 | 52956B-1

Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE-- M SIWHP

06/24/81 1155.0 - Crigunal

05/18/82 562.0
04/25/83 506.0

Allison Unit #47

Mesaverde Offset

32/54

07/02/84 637.0 03/18/86 535.0 09/31/89 689.0 09/31/89 689.0 09/31/89 689.0 03/18/91 501.0 08/23/91 513.0

07/05/93 493.0-curvent

Page No.: 8

Print Time: Mon Dec 29 14:00:04 1997

Property ID: 8252

Property Name: ALLISON UNIT | 9R | 36917A-1

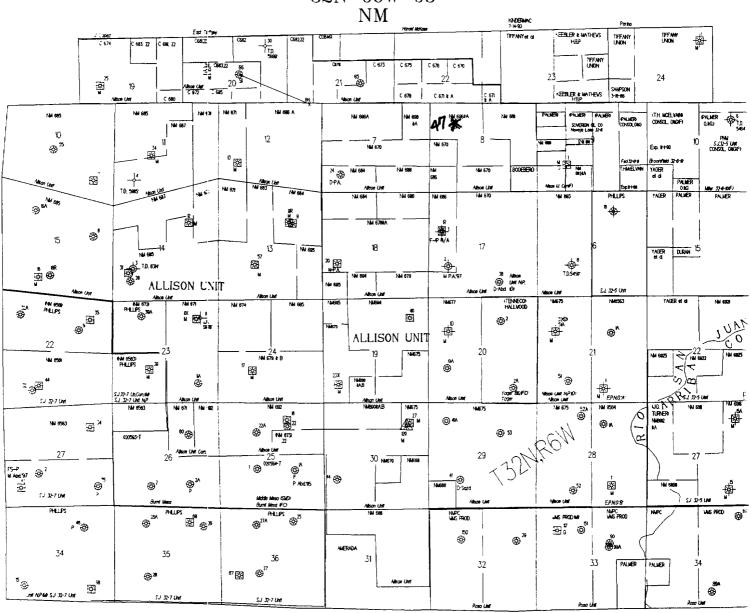
Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE-- M SIWHPPsi 2867.0 - OUCKNAI 02/09/56 06/02/70 1070.0 07/19/71 1112.0 08/10/72 1079.0 06/18/73 983.0 04/29/75 1026.0 08/08/77 924.0 06/04/79 953.0 04/25/83 1044.0 05/02/85 974.0 08/16/88 1175.0 04/22/90 969.0 02/01/94 804.0 575.0 - current 03/07/95

Allison Unut #47
Dakota Offset

91103

Allison Unit #47 Blanco Mesaverde / Basin Dakota 32N-06W-08



BURLINGTON RESOURCES OIL AND GAS COMPANY

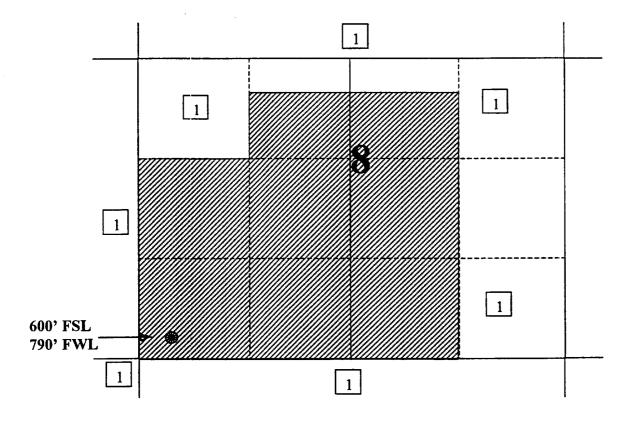
Allison Unit #47

OFFSET OPERATOR/OWNER PLAT

Mesaverde / Dakota Formations Commingle Well

(Nonstandard Section with Nonstandard Dedications for Mesaverde / Dakota Formations)

Township 32 North, Range 6 West



1) Burlington Resources

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 gar 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 Poo 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 Poois 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 Mcsaverde 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 highe 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 betwee: 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 fift four (354) interest owners in the Dakota and Mesaverde Participating Areas within th 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 the administrative approval for downhole commingling may be granted provided that the interest ownership, including working, royalty and overriding royalty interest, is commo among the commingled zones.
- (20) Applicant's proposed administrative procedure would provide for Divisio approval to downhole commingle wells in the Allison Unit Area without hearing, an without the requirement that each interest owner in the Dakota and Mesaverc Participating Areas be notified of such commingling.
- (21) The downhole commingling of wells within the Allison Unit Area wi 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 Alesaverde 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.

- (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