DISTRICT I

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

State of New Mexico
Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION

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

__YES __x_ NO

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

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

1000 Rio Brazos Rd, Aztec, NM 87410-1693

APPLICATION FOR DOWNHOLE COMMINGLING

APPROVAL PROCESS: _X_ Administrative ___Hearing **EXISTING WELLBORE**

Burlington Resources Oil & Gas C	company PO	Box 4289, Farmington, NM 8749	9
Operator Allison Unit		iress 08-32N-06W	San Juan
COGRID NO14538 Property Cod	Well No. Unit	Ltr Sec - Twp - Rge Spacin	County g Unit Lease Types: (check 1 or more) tate, (and/or) Fee _X
The following facts are submitted in support of downhole commingling:	Upper Zone Blanco Mesaverde - 72319	Intermediate Zone	Lower Zone Basin Dakota - 71599
Pool Code 2. Top and Bottom of	will be supplied upon completion		will be supplied upon completion
Pay Section (Perforations) 3. Type of production (Oil or Gas)	gas		gas
Method of Production (Flowing or Artificial Lift)	flowing		flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift:	(Current) a. 678 psi (see attachment)	a.	a. 840 psi (see attachment)
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1376 psi (see attachment)	WEGETVEN.	b. 3233 psi (see attachment)
6. Oil Gravity (API) or Gas BTU Content	BTU 993	DEC - 3 1983 19	BTU 948
7. Producing or Shut-In?	shut in	MA GING DINZ	shut in
Production Marginal? (yes or no)	no		yes
* If Shut-In and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
* 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
 10. Are all working, overriding, and roll foot, have all working, overridin Have all offset operators been given the production be recovered, and with the value of production be defected. 12. Are all produced fluids from all control of the value of production be defected. 13. Will the value of production be defected. 14. If this well is on, or communitize Land Management has been notified. 15. NMOCD Reference Cases for Rule of the Case of the Production curve for the Prod	yalty interests identical in all cog, and royalty interests been not yen written notice of the propose. Yes No _ If yes, are fluids all the allocation formula be reliable mmingled zones compatible with creased by commingling? d with, state or federal lands, ed in writing of this application. 303(D) Exceptions: ORDER NO is be commingled showing its speach zone for at least one year duction history, estimated prodution method or formula.	mmingled zones? Yes iffied by certified mail? Yes d downhole commingling? X_Yes compatible, will the formations not olex YesNo (If No, atta h each other?x_ Yes No Yes _X_ No (If Yes, attach explain ither the Commissioner of Public L _X_ Yes No	be damaged, will any cross-flowed ich explanation) onation) ands or the United States Bureau of
I hereby certify that the informa	-	plete to the best of my knowled	ge and belief.
SIGNATURE: Simith in	Celin TITLE: Pro	oduction Engineer DATE: 1	2-07-98
TYPE OR PRINT NAME: Ken	Collins TELEPHO	NE NO.: (505) 326-9700	

istrict 1 Box 1980. Hobbs. NM 88241-1980

District II PO Drawer CD. Artesia. NM 88211-0719

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

District IV PO Box 2088. Santa Fe. NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Cepartment

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

Revised February Submit to Appropriate Distric-State Lease - Fee Lease -

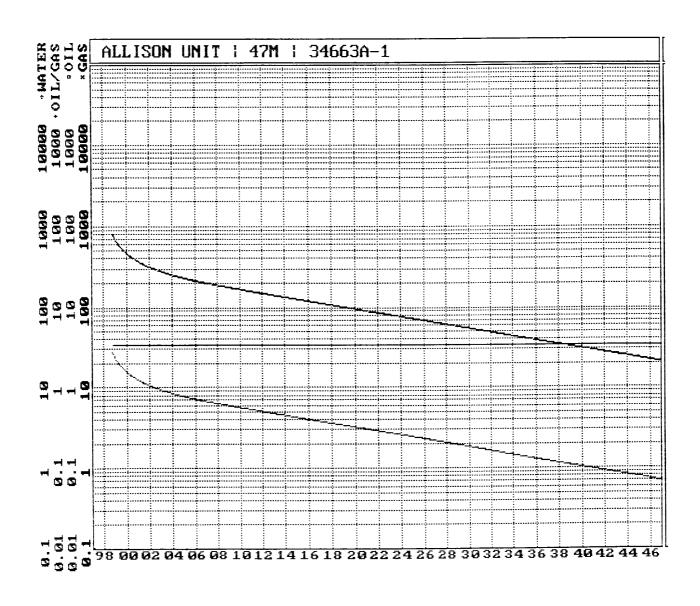
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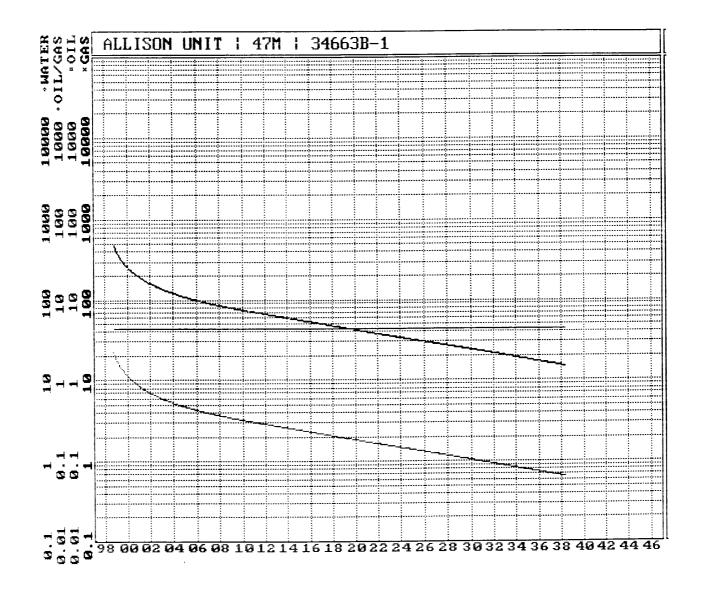
WELL LOCATION AND ACREAGE DEDICATION PLAT

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Allison Unit #47M Expected Production Curve Blanco Mesaverde



Allison Unit #47M Expected Production Curve Basin Dakota



Page No.: 1
Print Time: Mon Nov 23 10:40:19 1998

Property ID: 2397
Property Name: ALLISON UNIT | 10 | 52995B-1
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06/07/57	149000	672.0		Mesaverde Offset
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07/29/59	310000	787.0		
07/29/60	372000	702.0		
07/28/61	428000	685.0		
04/25/62	470000	694.0		
04/29/63	515000	741.0		
04/29/64	575000	718.0		
05/10/65	635000	649.0		
04/19/66	701000	775.0		
05/16/67	772000	598.0		
05/02/68	836000			
06/29/69	907891			
11/09/70	945021			
08/31/71	981281			
06/22/72	1021091			
04/18/74	1105130			
06/02/76	1212501			
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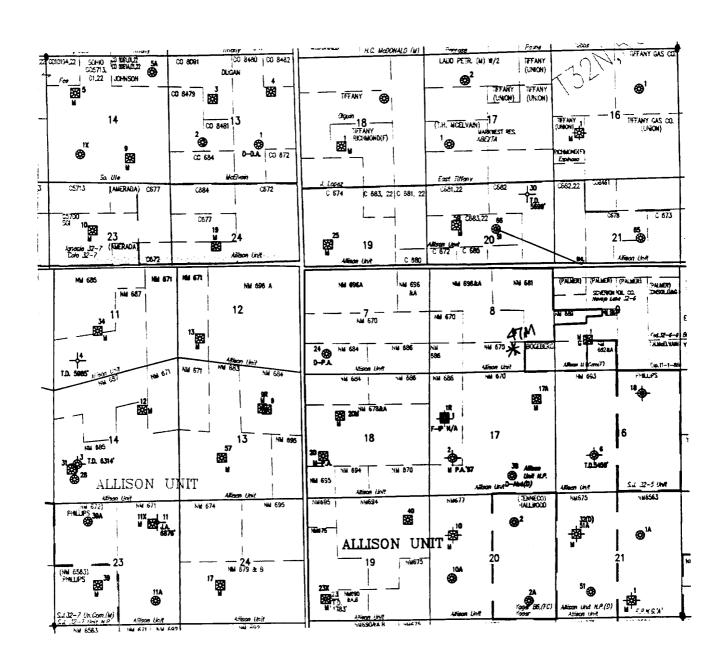
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04/22/64	1218000	1936.0		
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02/23/66	1556000			
03/06/67	1788000			
03/08/68	2354000			
04/16/69	2353404			
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Allison Unit #47M

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

Mesaverde	Dakota		
MV-Current	DK-Current		
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 \$\text{1.81} \text{\text{\text{M-V2S}}} DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) \$\text{581} \$\text{677.8}	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) 84		
MV-Original	DK-Original		
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Allison Unit #47M Blanco Mesaverde / Basin Dakota 32N-06W-08O

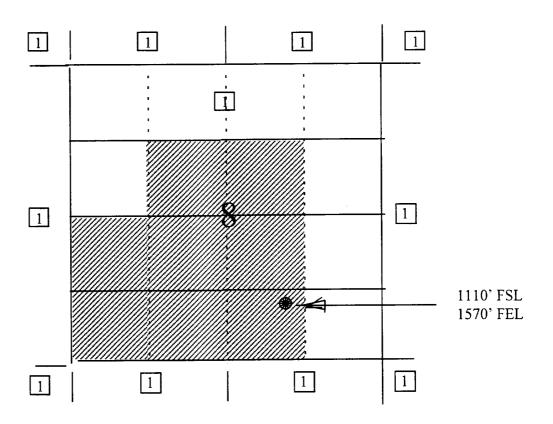


BURLINGTON RESOURCES OIL AND GAS COMPANY

Allison Unit #47M OFFSET OPERATOR \ OWNER PLAT Downhole Commingle

Mesaverde/Dakota Formations Well

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 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 commingie 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 Alesaverde Participating Areas of sub-equent 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

SEAL