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

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 __x_NO

Burlington Resources Oil & Gas C	ompany PO B	ox 4289, Farmington, NM 874	99
Operator	Addre	_	
Allison Unit Com		32N-06W r Sec - Twp - Rge	San Juan County
Lease	Well No.		sing Unit Lease Types: (check 1 or more)
OGRID NO14538 Property Cod	de6784 API NO30-XXX_	Federalx, State	, (and/or) Fee _X
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
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		gas
Method of Production (Flowing or Artificial Lift)	flowing		flowing
5. Bottomhole Pressure	(Current) a. 511 psi (see attachment)	a.	a. 840 psi (see attachment)
Oil Zones - Artificial Lift:	(
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones:	(Original) b. 1421 psi (see attachment)	b.	b. 3233 psi (see attachment)
Estimated or Measured Original 6. Oil Gravity (API) or	BTU 990		BTU 948
Gas BTU Content			
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	Date: n/a	Date:	Date: n/a
last production	Rates:	Rates:	Rates:
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data			
* 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:
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: %	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
10. Are all working, overriding, and re if not, have all working, overriding Have all offset operators been gi 11. Will cross-flow occur?x production be recovered, and wi 12. Are all produced fluids from all co	ca and/or explaining method and property interests identical in all coming, and royalty interests been notified with a proposed of the proposed. Yes No _ If yes, are fluids confirmed allocation formula be reliable ommingled zones compatible with ecreased by commingling? Y	nmingled zones? ied by certified mail? I downhole commingling?x_b compatible, will the formations nex Yes No (If No, a each other?x_ Yes es _X_ No (If Yes, attach exp	(es _xNo (es _xNo (es _xNo (esNo ot be damaged, will any cross-flower ttach explanation) No olanation)
			Lands or the United States Bureau o
15. NMOCD Reference Cases for Rule			
* Production curve for * For zones with no pro * Data to support alloca * Notification list of all * Notification list of wo	o be commingled showing its spaceach zone for at least one year. (I oduction history, estimated production method or formula. offset operators. rking, overriding, and royalty intenents, data, or documents required	r not available, attach explanation tion rates and supporting data.	11.,
I hereby certify that the informa	ation above is true and comp	lete to the best of my knowl	edge and belief.
SIGNATURE: Junth in (III TITLE: Pro	duction Engineer DATE:	1-18-99
TYPE OR PRINT NAME: Ken	neth Collins TEI	LEPHONE NO.: (505)	326-9700

District I PO Box 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 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-1 Revised February 21, 199 Instructions on ba

Submit to Appropriate District Offi

State Lease - 4 Copie Fee Lease - 3 Copie

AMENDED REPOR

WELL LOCATION AND ACREAGE DEDICATION PLAT

, 'A	PI Numbe	er ²Pool Code			е	³Pool Name			
30-045-		72319/71599 Blanco Mesaverde/Basin Dakota							
¹Property	Code	*Property Name *Well Number					ell Number		
6785		ALLISON UNIT COM 64					64		
'OGRID N	10.	*Operator Name *Elevation					Elevation		
14538		BURLINGTON RESOURCES OIL & GAS COMPANY 6135				6135			
¹⁰ Surface Location									
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
I	8	32N	6W		2235	SOUTH	155	EAST.	SAN JUA
¹¹ Bottom Hole Location If Different From Surface									
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
		13	172						
MV-317.	51	¹³ Joint or In	fill "Cons	olidation Code	¹⁵ Order No.				
DK-317.									

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

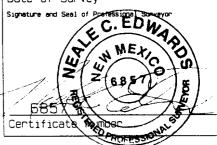
5318.28 12 90 Signature 2 3 615 Peggy Bradfield . 25 Printed Name 86 1159. Regulatory Administrate 1321 Title 155 Date FEE 18 SURVEYOR CERTIFICATIO 2235 25 2698.74 2670.36° 2682.90

17 OPERATOR CERTIFICATIO I hereby certify that the information contained herein true and complete to the best of my knowledge and beli

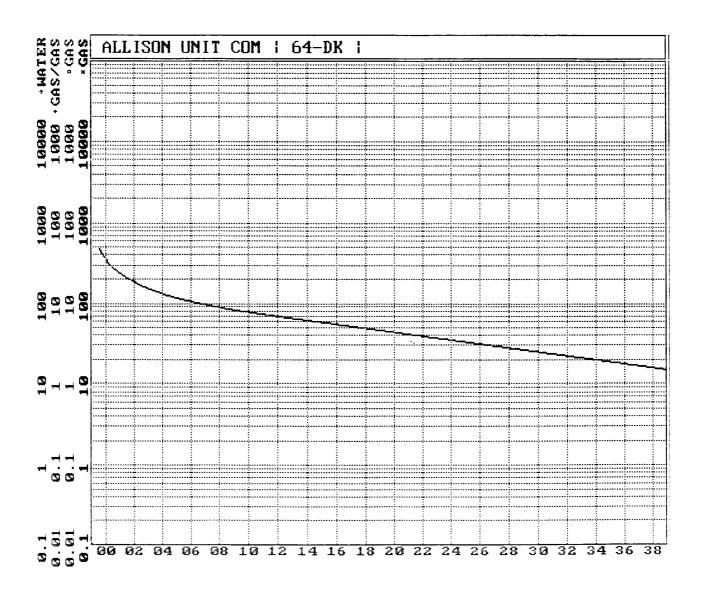
I hereby certify that the well location shown on this was plotted from field notes of actual surveys made by or under my supervision and that the same is true and correct to the best of my belief.

DECEMBER 4. 1998

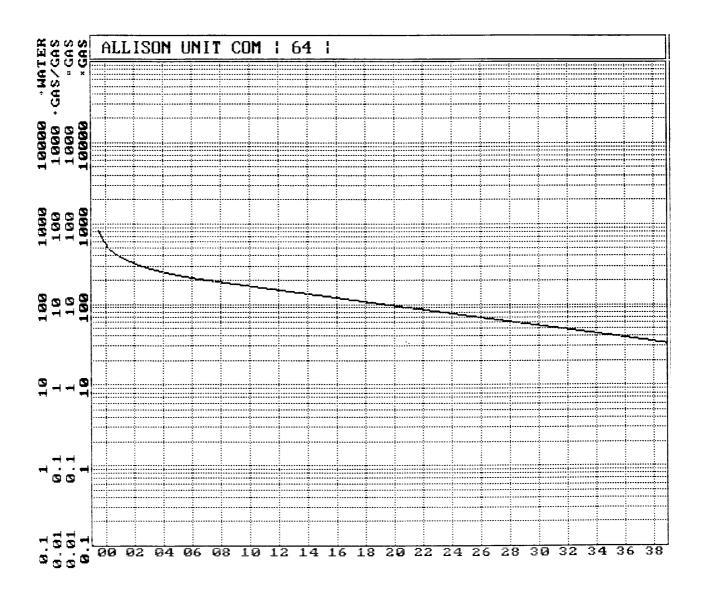
Date of Survey



Allison Unit Com #64 Expected Production Dakota Formation



Allison Unit Com #64
Expected Production
Mesaverde Formation



Allison Unit Com #64

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) C %N2 CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) D.5886 C.7986 C.7	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 4.78 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 840.1		
MV-Original	DK-Original		
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 0.586 C 0.007 C	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 4.78 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3232.7		

Page No.: 1
Print Time: Wed Jan 13 14:37:03 1999

Property ID: 37

Property Name: ALLISON UNIT | 20 | 52930B-1

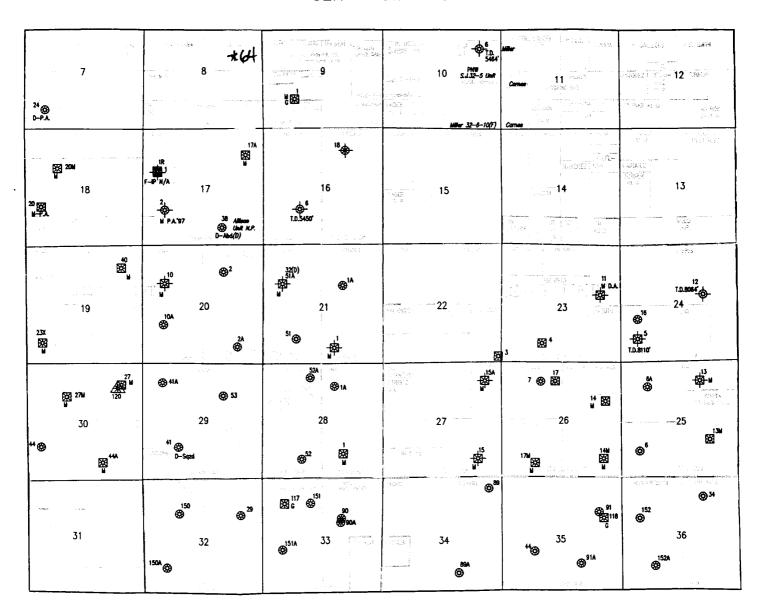
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	CUM_GAS		
05/23/59	0	2691.0 2690.0	Allison Unit Com #64
06/01/59 02/22/60	235000	2121.0	
02/22/60	818000	1868.0	Dakota Offset
04/25/62	1024000	1777.0	
05/06/63		1948.0	
04/22/64	1218000		
05/03/65	1409000		
02/23/66	1556000		
03/06/67	1788000		
03/08/68	2354000		
04/16/69			
06/20/70		1477.0	
07/19/71	2718492	1882.0	
02/15/72	2898250	1404.0	
00/04/73		860.0	
00/04/73			
00/04/73			
10/04/73			
04/29/75			
08/08/77			
06/04/79			
05/15/81			
04/25/83			
05/02/85			
08/16/88			
04/22/90			
03/29/92			
03/01/94	6272083	709.0	

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Print Time: Wed Jan 13 14:37:04 1999
Property ID: 1
Property Name: ALLISON UNIT NP | 38 | 52934B-1
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

DATE	CUM_GAS Mcf		
10/12/78	0	1237.0	Allison Unit Com #64
07/05/79	54975	943.0	
06/05/80	183351	572.0	Mesaverde Offset
05/03/82	340024	492.0	Mesaverue Offset
07/02/84	456824	476.0	
03/18/86	554640	490.0	
05/23/89	649302	584.0	
02/18/91	741991	490.0	
07/14/91	761866	502.0	
05/04/93	859475	450.0	

Allison Unit Com #64 Mesaverde / Dakota 32N - 6W - 8

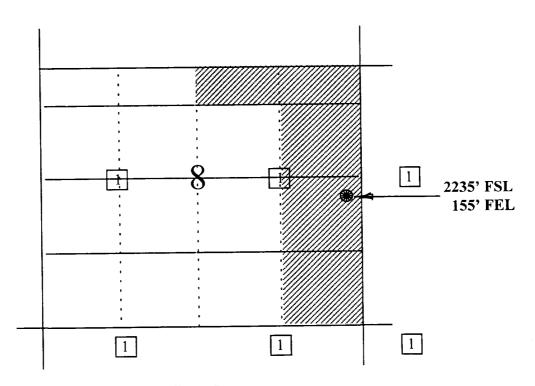


BURLINGTON RESOURCES OIL AND GAS COMPANY

Allison Unit Com #64 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, Ne Mexico, before Examiner David R. Catanach.

NOW, on this 6th day of July, 1993, the Division Director, having considerent the testimony, the record, and the recommendations of the Examiner, and being full advised in the premises,

FINDS THAT:

- (1) Due public notice having been given as required by law, the Division is jurisdiction of this cause and the subject matter thereof.
- (2) The applicant, Meridian Oil Inc., seeks approval to commingle g production from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison U: Well No. 9R located 1720 feet from the North line and 1655 feet from the East li (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan Couni New Mexico.
- (3) The applicant further seeks the adoption of an administrative procedure: authorizing the downhole commingling of Blanco-Mesaverde and Basin-Dakota Poproduction within certain existing and subsequently drilled wells in its Allison Unit Arc San Juan County, New Mexico, without additional notice to each affected interest own 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 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 tha within the wells it proposes or will propose to commingle within the Unit Area:
 - a) there will be no crossflow between the two commingied pools;
 - b) neither commingled zone exposes the other to damage by produce: liquids;
 - c) the fluids from each zone are compatible with the other;
 - d) the bottomhole pressure of the lower pressure zone should not b 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 the values of the individual production.
- (16) The Dakota and Mesaverde Participating Areas within the Allison Unit ar 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 fif 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 th administrative approval for downhole commingling may be granted provided that to interest ownership, including working, royalty and overriding royalty interest, is common among the commingled zones.
- (20) Applicant's proposed administrative procedure would provide for Divisic approval to downhole commingle wells in the Allison Unit Area without hearing, as without the requirement that each interest owner in the Dakota and Mesavero Participating Areas be notified of such commingling.
- (21) The downhole commingling of wells within the Allison Unit Area w benefit working, royalty and overriding royalty interest owners. In addition, to downhole commingling of wells within the Allison Unit Area should not violate to correlative rights of any interest owner.

- (22) evidence in this case indicates that. to each interest owner within the Dakota an Assaverde 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 gaproduction 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 lin (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 c the Division subsequent to the completion of the subject well in order to determine 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