

dugan production corp.

February 11, 2000



Ms. Lori Wrotenbery, Director New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505 Mr. Lee Otteni, Manager Bureau of Land Management - FFO 1235 LaPlata Highway Farmington, NM 87401

Re: Application for Downhole Commingling and Unorthodox Location Basin Fruitland Coal and Bisti Chacra Gas Pools Dugan Production's Zappa No. 3 (API No. 30-045-29908) Unit P, Section 27, T-22N, R-8W Federal Lease NM 57445 San Juan County, New Mexico

Dear Ms. Wrotenbery and Mr. Otteni:

Dugan Production Corp. requests your approval to downhole commingle production from the Basin Fruitland Coal and Bisti Chacra gas pools within the wellbore of our recently drilled Zappa No. 3. In addition, we request approval for a non-standard location of the proposed Fruitland Coal completion since the subject well is in the SE/4. The Zappa No. 3, located 790' FSL and 1190' FEL of Section 27, is otherwise at an orthodox location for both pools. NMOCD form C-107-A is attached. The proposed Fruitland Coal spacing unit consists of the South half and the Chacra spacing unit is the SE/4 of Section 27. Federal Lease NM 57445 covers the entire south half and Dugan Production Corp. holds 100% of the working interest. The anticipated production from both formations will be natural gas and possibly some water. We do not anticipate oil production from either pool.

The Zappa No. 3 was completed on 12-2-99 in the Chacra formation as an extension to the Bisti Chacra gas pool. The completion and production testing to date are presented on Attachment No. 3 and based upon this work, combined with our extensive experience with other Chacra completions in the general area as well as the Rusty Chacra gas pool to the east, it is our belief that the Chacra completion in the Zappa No. 3 is indicated to be productive of natural gas and it is our intention to fracture stimulate the Chacra to improve the well's productivity.

In addition, we propose to complete and fracture stimulate the Fruitland Coal interval in conjunction with our frac job in the Chacra completion. This will allow us to maximize the gas productivity from the Zappa No. 3 and will help keep our completion costs as low as possible which is important to the overall economics of developing marginal gas areas.

The Zappa No. 3 is located in an area that Dugan Production has been developing since 1993 and to date has completed 17 wells, (16 Chacra and 1 Fruitland Coal) all of which are currently shut in as there is no gas gathering system in place. Attachment No. 5 presents a map of this area and

Attachment No. 6 presents a summary of the individual wells. We anticipate that most of these wells will produce at fairly low rates once connected to a gas gathering system.

Dugan Production Corp. is currently evaluating our options to place each of these wells on production and is considering the installation of a gas gathering system which will deliver gas to existing systems ± 5 miles east, ± 11 miles northwest or into PNM's main line to Albuquerque. As with most things, there are pros and cons to each option, but no matter which option is chosen, a substantial work effort and investment will be needed to install the gas gathering lines and facilities necessary to place these wells on production. The proposed Fruitland Coal completion and downhole commingling in our Zappa No. 3 will aid in developing the gas production rates needed to support moving ahead with installation of a gas gathering system.

Attachment No. 8 is a copy of our letter (sent certified-return receipt) to the owners of offsetting leases all of which are undeveloped. Dugan Production Corp. holds the leasehold interest on \pm 73% of the offsetting acreage and is the operator of all wells offsetting the Zappa No. 3. Attachment No. 4 presents the offset acreage ownership information.

In summary, Dugan Production corp. is requesting approval from the BLM and the NMOCD for the proposed downhole commingling of Bisti Chacra and Basin Fruitland Coal gas production in our Zappa No. 3. The Fruitland Coal has not been completed and will require an unorthodox location approval since the Zappa No. 3 Chacra well was drilled in the SE/4 of Section 27. Upon receiving the requested approvals, we intend to complete the Fruitland Coal and fracture stimulate both formations which hopefully will develop sufficient productivity in the Zappa No. 3 such that we can then move forward with the planning and installation of a gas gathering system not only for the Zappa No. 3 but for 17 other shut in Dugan Production gas wells in the general vicinity of the Zappa No. 3. The Chacra and Fruitland Coal formation in this general area are on the southern edge of the San Juan Basin and all wells are believed to be capable of producing gas only at low rates (50 mcfd or less). Dugan Production Corp. holds 100% of the working interest, the same federal lease covers both spacing units and all interest in both zones is common.

Should you have questions or need additional information, please let me know.

Sincerely,

· , , ;

John D. Roe

John D. Roe Engineering Manager

JDR/mm Attachments

cc: NMOCD - Aztec All Offset Interest Owners **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

Form C-107-A **APPROVAL PROCESS:** XAdministrative _ Hearing **EXISTING WELLBORE** X YES NO

APPLICATION FOR DOWNHOLE COMMINGLING

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

Dugan Production Corp.

P. O. Box 420, Farmington, NM 87499-0420

Zappa

P-27-T22N-R8W

San Juan Spacing Unit Lease Types: (check 1 or more)

006515 013361 30-045-29908 OGRID NO. **Property Code** API NO. FederalX, State

, (and/or) Fee he following facts are submitted in upport of downhole comminging Intermediate Zone Basin Fruitland Coal 71629 1. Pool Name and Pool Code Bisti Chacra 96166 752'-775' (proposed) 1130-1252 2. Top and Bottom of Pay Section (Perforations) Gas Gas Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) Flowing Flowing -possibly artificial lift 5. Bottomhole Pressure a. (Current) 190 PSIA @ 765' (estimated) a a. 300 PSIA @ 765' (estimated) Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current (Original) All Gas Zones: Estimated Or Measured Original b. b. 300 PSIA @ 765' (estimated) b.190 PSIA @ 765' (estimated) ±1020 BTU/CF ±1120 BTU/CF 6. Oil Gravity (°API) or Gas BTU Content 7. Producing or Shut-In? To be completed Shut-in Production Marginal? (yes or no) Anticipated to be yes If Shut-In, give date and oil/gas/ water rates of last production Date Date: Date: 12-7-99 Rates Rates Rates: Max SIWHP = 254 PSIA Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data Date Date ' If Producing, give date andoil/gas/ water rates of recent test (within 60 days) Date: Rates Rates Rates Oil: Oil: 8. Fixed Percentage Allocation Formula -% for each zone Gas: Oil: Gas: Gas: % 50% % % % 50%

If allocation formula is based upon something other than current 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. 9. X Yes Yes XƳes

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? \times 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. \times Yes ____ No (If No, attach explanation) 11. Will cross-flow occur?

12. Are all produced fluids from all commingled zones compatible with each other? X Yes ___ No

13. Will the value of production be decreased by commingling? (If Yes, attach explanation) _Yes X No

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. XYes ____ 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.-Attachments 1 & 2
* Production curve for each zone for at least one year. (If not available, attach explanation.)-Attachment No. 3
* For zones with no production history, estimated production rates and supporting data.- Attachment No. 3
* Data to support allocation method or formula.-Attachment No. 3
* Notification list of all offset operators.-Attachment No. 4
* 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.

SIGNATURE _	9	Jahn	0.	Roe_	TITLE	Engineerin	g Manager	DATE	February	10,	2000
	0										
TYPE OR PRI	NT NAME	John Roe				TE	LEPHONE N	O. (505)325-1	821		

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Certificate Number Status

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Attachment No. 3 Well Completion & Production Potential Summary Dugan Production Corp.'s Zappa No. 3 Unit P, Section 27, T-22N, R-8W San Juan County, New Mexico

Spud:	7-6-99
Completed:	12-2-99
Drilled TD:	1405' Plugged back TD: 1362'
Casing:	7", 20#@ 120'
	41/2", 10.5# @ 1398'
Tubing:	2 3/8", 4.7# @ 1198'
Perforations:	Bisti Chacra - 1130', 1137', 1144', 1153', 1163', 1172', 1180', 1195', 1207', 1213', 1220',
	1222', 1230', 1237', 1242', 1252'. Total 16 holes.
Stimulations:	1. Breakdown 1130'-1252' w/100 gallons 15% HCL @1000 psi. Pumped in @
	5 bpm & 800 psi. ISDP = 520 psi.
	2. Breakdown 1130' - 1252' w/650 gallons 15% HCL & 32 ball sealers. Had good
	ball action & balled out @ 3500 psi.
Production	
Testing:	12-2-99 Swab tubing dry following acid breakdown.
	12-3-99 SITP = 5 psig, SICP = 50 psig
	12-4-99 SITP = 50 psig, SICP = 200 psig
	Check fluid level @ 750'.
	Such 1 time & well unloaded Recovered approximately 2 bbl water

Swab 1 time & well unloaded. Recovered approximately 2 bbl water. Shut well in. Check fluid level after 1 hr. No fluid entry. Shut well in.

12-7-99 SITP = 207 psig SICP = 242 psig
Opened well to pit. Unloaded small amount of fluid. Tubing pressure bled to 0 psig & casing to 60 psig with well flowing gas at a steady blow - gas would burn. Shut well in pending frac stimulation.

Production

Potential:Bisti Chacra Perforations 1130' - 1252'Completion and testing to date in the Zappa No. 3 indicates the Chacra is productive of
dry natural gas plus a small amount of water and has a shut-in pressure of 254 psia which
is similar to the initial shut-in pressures of other Chacra completions in the general area
(see Attachment No. 6). The Chacra will need to be fracture stimulated to establish

commercial gas rates. Although there are eight shut-in Chacra completions within T22N, R8W (ref attachment No. 6), there are no wells that have produced beyond the completion testing since a pipeline connection is currently not available. The nearest Chacra production is in Dugan Production's Dome Rusty 20-22-7 No. 1, located ± 4 miles to the east (P-20-22N-7W). The production history for this well is presented on page no. 4 of this attachment. A total of 31.1 million cubic feet of gas have been produced over an 18 year period for an overall average of 4.75 mcfd. Initial production averaged approximately 33 mcfd, and the well currently averages ± 3 mcfd.

Within T22N, R7W, there are a total of 27 Chacra completions with cumulative production ranging from 9.4 to 113.5 mmcf and averaging \pm 50 mmcf per well. (Ref. pg no. 5 of this attachment).

Basin Fruitland Coal

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The Fruitland Coal occurs in the Zappa No. 3 wellbore from 752 to 775', and, based upon cased hole logs plus sample analysis, is believed to be a 23' continuous coal interval. To date the nearest test of the Fruitland Coal is in Dugan's Zappa No. 2 (F-20-22N-8W) approximately 3 miles to the northwest which was completed 9-12-94 testing methane gas and water following a foam frac job which screened out after pumping \pm 15,000 lbs of sand. A shut-in surface pressure of 187 psia has been measured which is representative of the pressure anticipated for the Fruitland Coal (@ \pm 750'. The nearest established production from the Fruitland Coal is from Dugan Production's Sapp No. 90 (B-29-24N-8W) approximately 12 miles to the north. The production history for the Sapp No. 90 is presented on page No. 6 of this attachment. A total of 122.4 million cubic feet of gas have been produced over a 5 year period for an overall average of \pm 65 mcfd. Initial production averaged approximately 300 mcfd and the typical incline of gas production from the Fruitland Coal has not been exhibited. Production had declined to \pm 3 mcfd and $\pm\frac{1}{2}$ to 1 bwpd when rod pump equipment was installed increasing production to \pm 60 mcfd and 5 bwpd.

Within T24N-R8W there are a total of 10 Fruitland Coal completions with cumulative production ranging from 631 mcf to 225.9 mmcf and averaging \pm 68 mmcf per well.

With reference to Attachment No. 7, it can be seen that the Zappa No. 3 is within ± 8 miles of the southern outcrop of the Fruitland Coal in the San Juan Basin. This combined with the fact that the nearest Fruitland Coal production is ± 12 miles to the north and a test of the Fruitland Coal ± 3 miles to the northwest did confirm that production potential does exist in the Fruitland Coal, however since a pipeline connection is not currently available, sufficient testing has not occurred and we can only say that the Fruitland Coal does appear to be productive of methane gas plus water.

Thus at this time, we expect to develop marginal gas rates from the Chacra and Fruitland Coal in the Zappa No. 3, averaging 15-30 mcfd from each zone. Based upon an analysis

of production from 27 Chacra wells one township to the east and 10 Fruitland Coal wells two townships to the north, we anticipate developing 50 to 60 mmcf of gas from each zone.

Summary of Anticipated Zappa No. 3 Production

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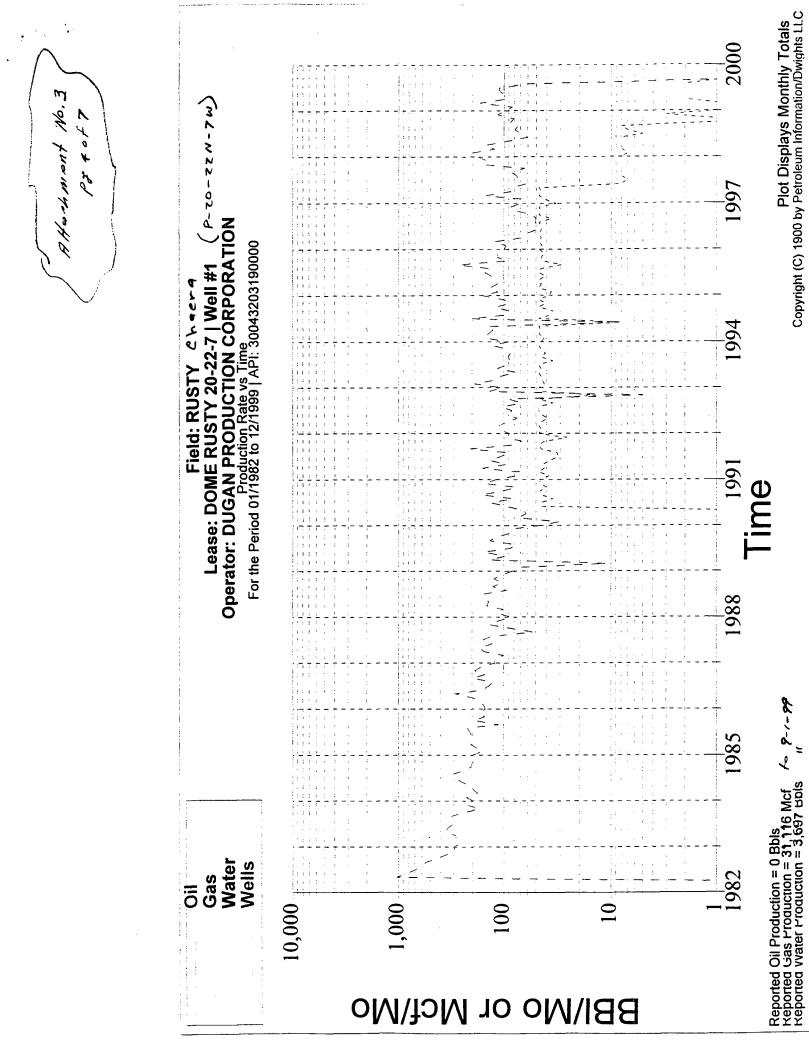
		Production	Gas Reserves
	<u>MCFD</u>	BWPD	MMCF
Basin Fruitland Coal	15 to 30	5 to 10	50 to 60
Bisti Chacra	15 to 30	1 to 2	50 to 60

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Proposed allocation of Commingled Production*

	Gas	<u>Water</u>
Basin Fruitland Coal	50%	80%
Bisti Chacra	50%	20%

*<u>NOTE:</u> If the commingled production after 12 months of continuous production exceeds 60 mcfd indicating that at least one of the zones is producing at higher than anticipated rates, Dugan Production will consider addidtional testing of the Zappa No. 3 in order to verify the appropriate production allocation factors.



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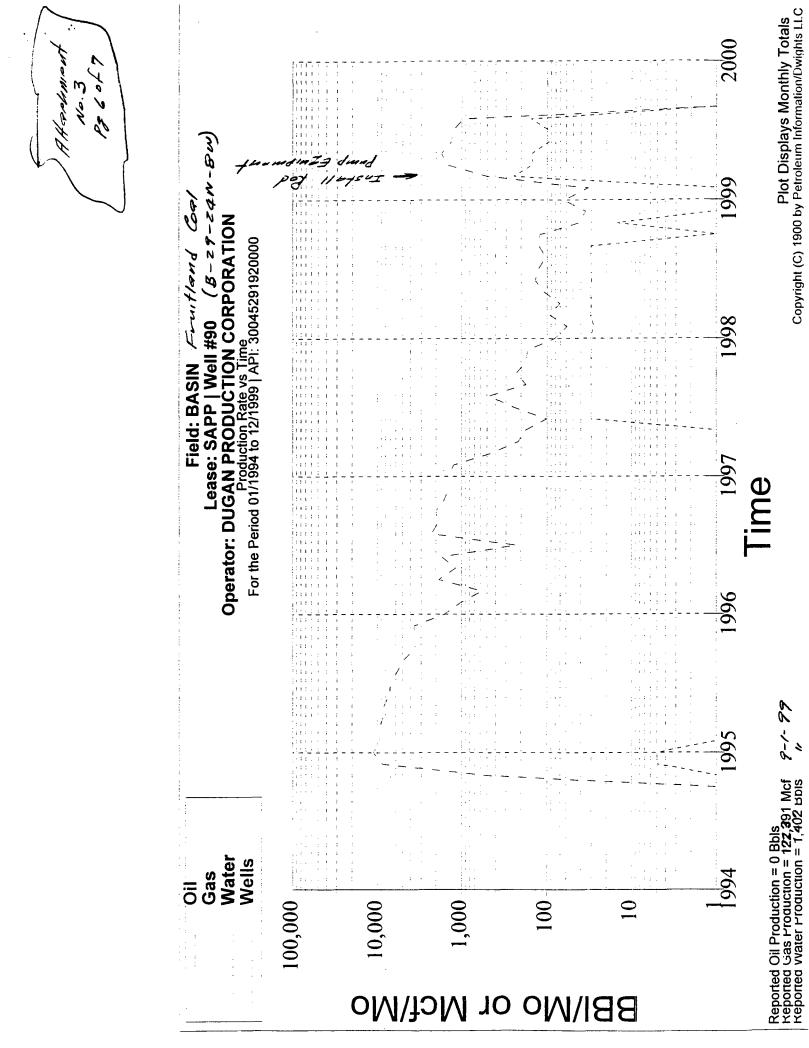
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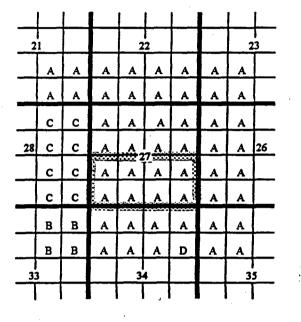
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Attachment No. 4 Offset Lease Ownership Dugan Production Corp.'s Zappa No. 3 Unit P, Section 27, T-22N, R-8W San Juan County, New Mexico



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<u>R8W</u>

Lease Ownership

- A = Dugan Production Corp. P. O. Box 420, Farmington, NM 87499-0420
- B = Daniel Gonzales P. O. Box 2475, Santa Fe, NM 87504-2475
- C = 40% Yates Petroleum 105 S. 4th Street, Artesia, NM 88210 20% Myco Industries - P. O. Box 840, Artesia, NM 88210-0840 20% Abo Petroleum Corp. - 105 S. 4th Street, Artesia, NM 88210 20% Yates Drilling Co. - 105 S. 4th Street, Artesia, NM 88210
- D = 4% Yates Petroleum 105 S. 4th Street, Artesia, NM 88210
 32% Myco Industries 105 S. 4th Street, Artesia, NM 88210
 32% Abo Petroleum Corp. 105 S. 4th Street, Artesia, NM 88210
 32% Yates Drilling Co. 105 S. 4th Street, Artesia, NM 88210

*** = Zappa No. 3 Fruitland Coal Spacing Unit. Chacra Spacing Unit = SE/4

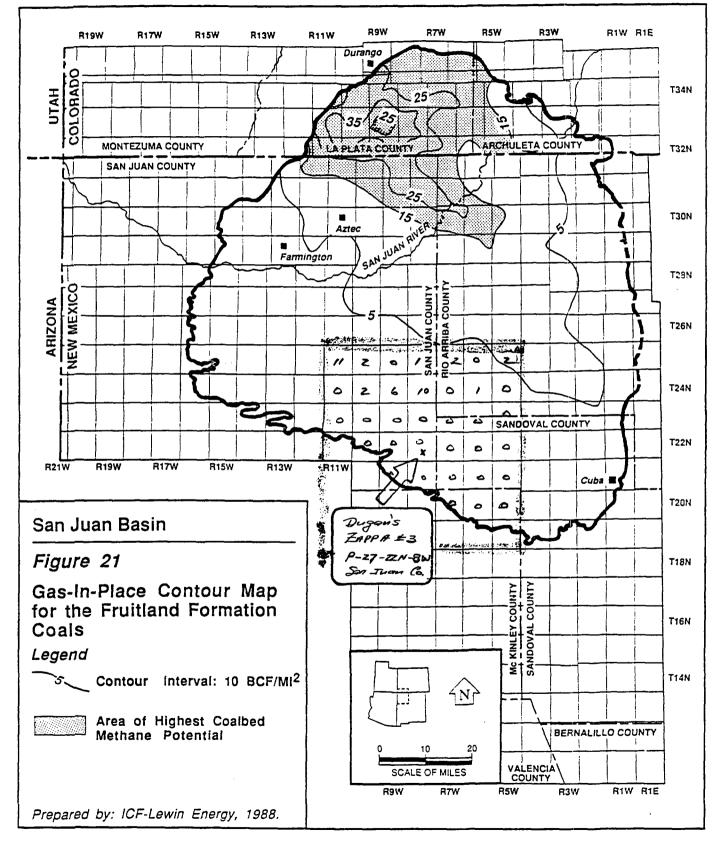
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Gaye DPC Joplin 12	Dugan 2 ^{1,2}	8	DPC 9	Sage Cree Warner •! • • • • • • • • • • • • • • • • • •		
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24	T 22 N 19	DPC 1 # ² Zappa 20	DPC 21	22	DPC 23 茶 ² Goodman	DPC 24 #James
م م- 25	30	29	28		DPC ** Dorsey 26 * Ellington	DPC 25
36	31 DPC 2-28-03 NM-90473	32	33		35 ☆ ² DPC ch Bullie	DPC 36
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					P or (P or Compl. Test	Estimated	
Location			Completion		Gas Rate	Flowing Press.	Max. SIWHP	
U-S-T-R	Operator	Well	Date	Pool	MCFD	PSIA	PSIA	Remarks
Wells Within 25 Section Study Area	iction Study Area							
A-16-22N-8W	Dugan Production	Cochran #1	6-24-98	Bisti Chacra	75	83	312	Texaco compl.10/80 & plugged 9/88
D-17-22N-8W	Benson Mineral	Federal 17-22-8 #1	6-5-80	Undes. Chacra	P&A	1	NR	Chacra tested gas - TSTM
F-20-22N-8W	Dugan Production	Zappa #1	9-6-94	Bisti Chacra	15	12	282	
F-20-22N-8W	Dugan Production	Zappa #2	9-12-94	Basin Fruitland Coal	8		187	PC tested wet & plugged 11/94
N-22-22N-8W	San Juan Venture	Midway #1	6-21-82	A	P&A		NR	Coleman compl. P&A 11/77
N-22-22N-8W	San Juan Venture	Midway #2	6-21-82	A	P&A		NR	
N-22-22N-8W	San Juan Venture	Midway #3	6-23-82	A	P&A		NR	
L-23-22N-8W	Dugan Production	Goodman #2	1-4-95	Bisti Chacra	184	13	337	
I-24-22N-8W	Dugan Production	James #1	12-3-99	Rusty Chacra	8		352	
E-26-22N-8W	Dugan Production	Dorsey #1	12-1-99	Bisti Chacra	8		282	
N-26-22N-8W	Dugan Production	Ellington #1	10-6-99	Bisti Chacra	179	13	277	
A-27-22N-8W	Dugan Production	Zappa #91	Location	Basin Fruitland Coal	1	I		
P-27-22N-8W	Dugan Production	Zappa #3	12-2-99	Bisti Chacra	ß		254	
I-34-22N-8W	Dugan Production	Dilly #1	4-6-82	Undes. Chacra	P&A		NR	Tested gas TSTM after foam frac
J-35-22N-BW	Dugan Production	Billie #1	4-6-82	Undes. Chacra	P&A		R	Tested gas TSTM after foam frac
L-35-22N-8W	Dugan Production	Billie #2	1-31-81	Undes. Chacra	98	16	274	
F-4-21N-8W	Dugan Production	Billie #3	4-6-82	Undes. Chacra	P&A		NR	Tested gas TSTM from Chacra & PC
Additional Dugan F	Additional Dugan Production Wells in Vicinity of Study Area	of Study Area						
B-7-22N-8W	Dugan Production	Hendrix #1	5-11-93	Undes. Chacra	282	8	312	
B-7-22N-8W	Dugan Production	Hendrix #2	12-20-94	Escavada PC	8		132	Initial frac screened out
P-7-22N-8W	Dugan Production	Presley #1	5-23-94	Bisti Chacra	334	24	297	
H-18-22N-8W	Dugan Production	Cleve Kyle #1	5-21-93	Bisti Chacra	36	12	296	
D-18-22N-8W	Dugan Production	Cleve Kyle #2	5-12-94	Bisti Chacra	68	13	292	
P-1-22N-9W	Dugan Production	Gaye #1	6-7-94	Bisti Chacra	381	27	297	
A-12-22N-9W	Dugan Production	Joplin #1	8-17-93	Undes. Chacra	248	18	302	
H-13-22N-9W	Dugan Production	Morrison #1	9-3-93	Undes. Chacra	70	13	287	

A - well drilled through Chacra formation - no tests reported in Chacra or Fruitland Coal B - testing to date indicates flamable gas is being produced. Well shut in pending further testing and/or stimulation. NR - not reported

Altachomat No. 7 Borof 2



46 • FRUITLAND FORMATION, SAN JUAN BASIN

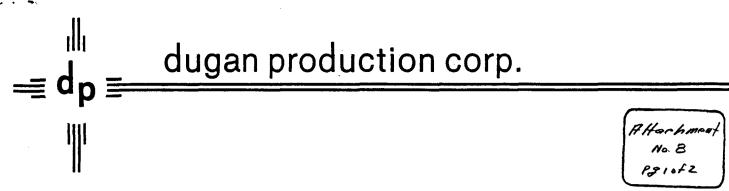
Number = the Fruitland Coal wells Producing mithin the Towaship 45 of 99. Jan 5 th age for w=11 Sperific dota.

GRI Topical Report BB/034 A Geological Assessment of Notwol

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Jan-28-2000 17:12 Field Name	Reservoir Name Operator Name Lease Name	Copyright 1999 Petroleum Information/Dwights Northwest New Mexico Scroll 170 List Lower Mell Number County Zone API Number Perfs	Cumulative Froduction Liquid Gas	Annual Production L O C A T I O N Liquid Gas TWN RNG SEC U/L	RHOILMAN M.T.
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February 11, 2000

CERTIFIED-RETURN RECEIPT REQUESTED

- To: Offset Lease Owners (Address List attached)
- Re: Application to NMOCD and BLM for Downhole Commingling and Unorthodox Well Location Basin Fruitland Coal and Bisti Chacra Gas Pools Dugan Production's Zappa No. 3 Unit P, Section 27, T-22N, R-8W San Juan County, New Mexico

Dear Offset Lease Owner:

Attached is a copy of the subject application.

Our records indicate that you hold leasehold interest to acreage that is offsetting Dugan's Zappa No. 3 well located in Unit P of Section 27, T-22N, R-8W. The spacing unit for the existing Bisti Chacra completion is the SE/4 of Section 27 and the spacing unit for the proposed Basin Fruitland Coal completion will be the S/2 of Section 27.

Should you have questions or need additional information, please feel free to contact me at the letterhead address and phone number. Should you have an objection to either of our applications, you should contact the NMOCD at 2040 South Pacheco in Santa Fe, New Mexico 87505 and we would appreciate receiving a copy of your objection.

Sincerely,

John D. Roc

John D. Roe Engineering Manager

JDR/mm Attachments

cc: NMOCD - Aztec and Santa Fe BLM

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Address List Offset Lease Ownership Dugan Production Corp.'s Zappa No. 3 Unit P, Section 27, T-22N, R-8W San Juan County, New Mexico

Lease Ownership

- Abo Petroleum Corp. 105 S. 4th Street, Artesia, NM 88210
- Daniel Gonzales P. O. Box 2475, Santa Fe, NM 87504-2475
- Myco Industries P. O. Box 840, Artesia, NM 88210-0840
- Myco Industries 105 S. 4th Street, Artesia, NM 88210
- Yates Drilling Co. 105 S. 4th Street, Artesia, NM 88210
- Yates Petroleum 105 S. 4th Street, Artesia, NM 88210