DATEIN	10/7/97	SUSPENSE 27/97 ENGINEER DC LOGGED W TYPE DHC								
	ABOVE THIS LINE FOR DIVISION USE ONLY NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau -									
	ADMINISTRATIVE APPLICATION COVERSHEET									
	THIS COVERSHE	EET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS								
Applic	Application Acronyms: [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]									
61 1	TYDE OF A	PPLICATION - Check Those Which Apply for [A]								
[1]	[A]	Location - Spacing Unit - Directional Drilling NSL NSP DD SD 0CT - 7 1997								
	Check [B]	k One Only for [B] and [C] Commingling - Storage - Measurement								
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery								
[2]	NOTIFICA [A]	TION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners								
	[B]	Gifset Operators, Leaseholders or Surface Owner								
	[C]	Application is One Which Requires Published Legal Notice								
	[D]	U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office								
	[E]	For all of the above, Proof of Notification or Publication is Attached, and/or,								
	[F]	U Waivers are Attached								

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

Peggy Bradfield	Fulfield	Regulatory/Compliance Administrator	10-3-97
Print or Type Name	Signature	Title	Date



SAN JUAN DIVISION

October 3, 1997

Mr. William LeMay New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Re: San Juan 28-6 Unit #124M 1080'FNL, 1850'FWL Section 22, T-28-N, R-06-W, Rio Arriba County, NM API #30-039-25728

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota pools in the subject well. This is a new drill Mesa Verde/Dakota well for the 1998 Program.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas Company is submitting the following for your approval of this commingling:

- 1. Form C107A Application for Downhole Commingling;
- 2. C-102 plat for each zone showing its spacing unit and acreage dedication;
- 3. Anticipated production curve for the Mesa Verde and Dakota for at least year;
- 4. Notification list of offset operators Burlington is the operator of the unit;
- 5. Shut in wellhead pressure and calculated down hole pressure of surrounding wells;
- 6. Nine-section plats for the Mesa Verde and Dakota.

Notification of Mesa Verde and Dakota interest owners is covered under Order R-10696 dated November 12, 1996.

We will consult with the Supervisor of the Aztec District Office of the New Mexico Oil Conservation Division to establish an allocation formula.

Please let me know if you require additional data.

Sincerely, < hadried

Peggy Bradfield Regulatory/Compliance Administrator

Xc: Bureau of Land Management – Farmington NMOCD – Aztec

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

Burlington Resources Oil & Gas Company

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

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

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

X Administrative ____Hearing **EXISTING WELLBORE**

PO Box 4289, Farmington, NM 87499

YES XNO

ICATION.	DOMANIL	ACTIVITY

APPLICATION FOR DOWNHOLE COMMINGLING

Operator					Address					
SAN JUAN 28-6 UNIT			124M C 22-28N-6W		6W	N Rio Arriba		Rio Arriba		
Lease			Well No.		Unit Ltr Sec - Twp - Rge			Ca	unty	
						Sp	acing L	Jnit Lease Types	: (check 1 or more)	
OGRID NO.	14538	Property Code	7462	API N	D. 30-039-25728	Federal	х	State	. (and/or) Fee	

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. 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
4. Method of Production (Flowing or Artificial Lift)	flowing		flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 533 psi (see attachment)	a.	a. 915 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1322 psi (see attachment)	Ь.	b. 3257 psi (see attachment)
6. Oil Gravity ([°] API) or Gas BTU Content	BTU 1233		BTU 1125
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 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:
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: % Ges: % % will be supplied upon completion	Oit: Gas: %	Oil: % Gas: % will be supplied upon completion

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.

- 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? ___Yes __x_No __Yes __x_No _x_Yes ___No
- 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? _x_Yes __ No
- 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

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). ____ R-10696

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.

SIGNATURE	antilaberta	TITLE_	Production Engineer	DATE	_10/02/97	

TYPE OR PRINT NAME __ Sean C. Woolverton ____ TELEPHONE NO. (505) 326-9700

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

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

1000 Rio Brazos Rd., Azter, NM 87410

District IV

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PO Box 2088, Santa Fe, NM 87504-2088

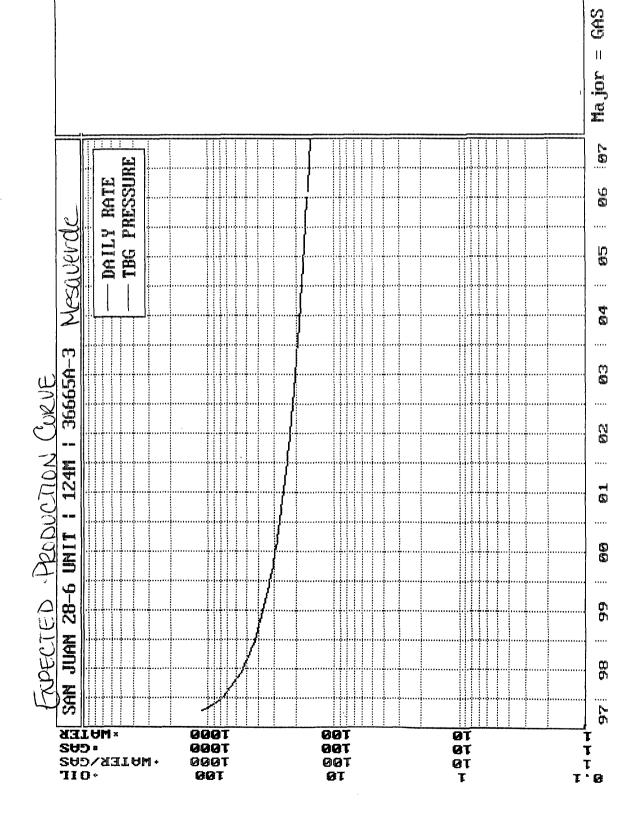
State of New Mexico Energy, Minerais & Natural Resources Department

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

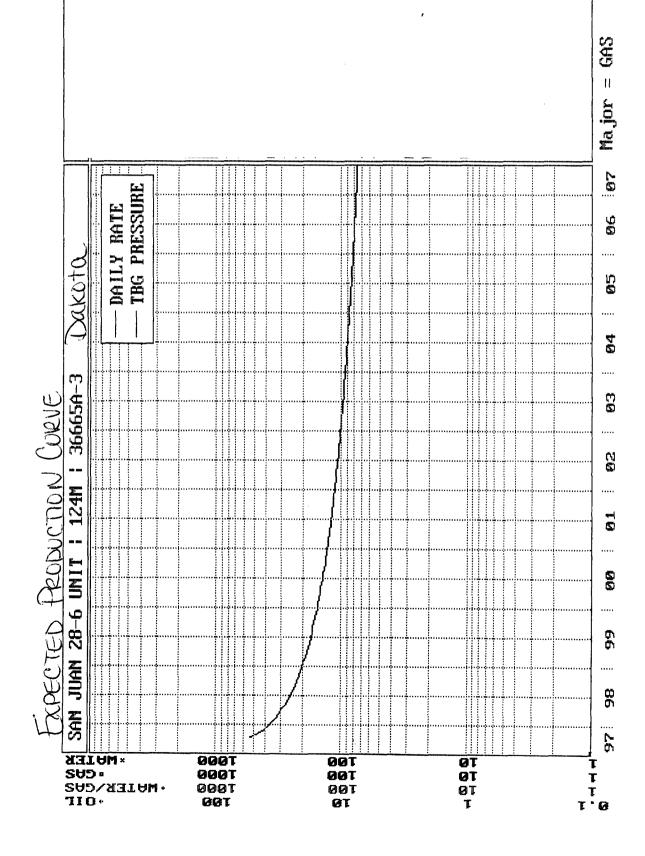
AMENDED REPORT

		WE	LL LO	CATION	I AND ACR	EAGE DEDI	CAI	TION PL	.AT		
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•	ny Code				' Property	Name				•	Well Number
746				San	<u>Juan 28-</u>						124M
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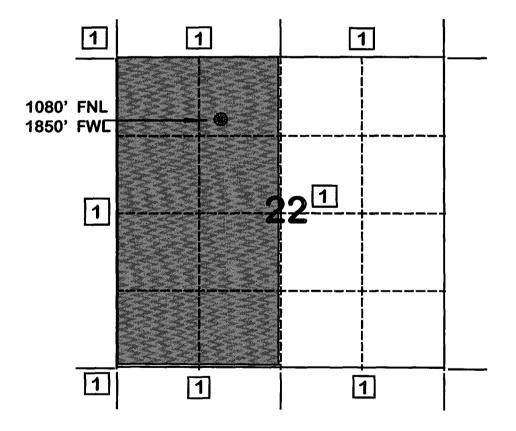
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-6 Unit #124M OFFSET OPERATOR \ OWNER PLAT

Mesaverde / Dakota Formations Commingle Well

Township 28 North, Range 6 West



1) Burlington Resources Oil and Gas Company

SJ 28-6 Unit #124M Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method Version 1.0 3/13/94

Mesaverde	Dakota			
<u>MV-Current</u>	<u>DK-Current</u>			
GAS GRAVITY0.726COND. OR MISC. (C/M)C%N20.26%CO20.89%H2S0DIAMETER (IN)2DEPTH (FT)5736SURFACE TEMPERATURE (DEG F)60BOTTOMHOLE TEMPERATURE (DEG F)137FLOWRATE (MCFPD)0SURFACE PRESSURE (PSIA)457BOTTOMHOLE PRESSURE (PSIA)532.5	GAS GRAVITY0.651COND. OR MISC. (C/M)C%N20.23%CO20.64%H2S0DIAMETER (IN)2.375DEPTH (FT)7816SURFACE TEMPERATURE (DEG F)60BOTTOMHOLE TEMPERATURE (DEG F)198FLOWRATE (MCFPD)0SURFACE PRESSURE (PSIA)764BOTTOMHOLE PRESSURE (PSIA)915.4			
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05/25/70	1456106	554.0		
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05/22/72	1625330	552.0		
08/21/73	1728136	442.0		
07/31/74	1802975	509.0		
07/12/76	1897122	621.0		
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12/04/79	2074188	627.0		
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05/04/71 369417	632.0	
05/22/72 408614	727.0	
09/04/75 544893	646.0	
08/08/77 603050	728.0	
04/24/79 656061	660.0	
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San Juan 28-6 Unit #124M Mesaverde / Dakota 28N-06W-22C

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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. 11628 ORDER NO. R-10696

- - - - -

APPLICATION OF BURLINGTON RESOURCES OIL & GAS COMPANY FOR THE ESTABLISHMENT OF A DOWNHOLE COMMINGLING "REFERENCE CASE" FOR ITS SAN JUAN 28-6 UNIT PURSUANT TO DIVISION RULE 303.E. AND THE ADOPTION OF SPECIAL ADMINISTRATIVE RULES THEREFOR, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

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This cause came on for hearing at 8:15 a.m. on October 17 and November 7, 1996, at Santa Fe, New Mexico, before Examiners David R. Catanach and Michael E. Stogner, respectively.

NOW, on this 12th day of November. 1996, 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. Burlington Resources Oil & Gas Company (Burlington), pursuant to the provisions of Division Rule 303.E., seeks to establish a downhole commingling "reference case" to provide exceptions for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota. Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 28-6 Unit. San Juan County, New Mexico.

(3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

CASE NO. 11628 Order No. R-10696 Page -3-

- c) establish a "reference case" whereby the Division utilizes the data presented in the immediate case to endorse or approve certain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a certain method of allocating production on Form C-107-A's subsequently filed for wells within the San Juan 28-6 Unit; and,
- d) establish a "reference case" or an administrative procedure for authorizing the downhole commingling of existing or future drilled wells within the San Juan 28-6 Unit without additional notice to each affected interest owner as required by Division Rule No. 303.D.

(7) In support of its request to except marginal economic criteria, the applicant presented geologic and engineering evidence and testimony which indicates that within the San Juan 28-6 Unit:

- a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent;
- b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 449 MMCFG and 186 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 254 MCFGD and 216 MCFGD, respectively; and,
- d) the estimated ultimate gas recoveries and initial producing rates from the Dakota and Pictured Cliffs formations are insufficient to justify drilling stand alone wells and/or dually completed wells to recover such gas reserves.

(8) The evidence and testimony presented by the applicant indicates that the Dakota and Pictured Cliffs formations within the San Juan 28-6 Unit should be properly classified as "marginal".

(9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 28-6 Unit, the applicant presented engineering evidence and testimony which indicates that:

- c) providing notice to each interest owner within the San Juan 28-6 Unit of subsequent downhole comminglings is unnecessary and is an excessive burden on the applicant;
- d) the downhole commingling of wells within the San Juan 28-6 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-6 Unit should not violate the correlative rights of any interest owner;
- e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for notice.

(14) An administrative procedure should be established within the San Juan 28-6 Unit for obtaining approval for subsequent downhole commingled wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are complied with.

(15) Approval of the proposed "reference cases" for marginal economic criteria, pressure criteria, allocation formulas and notice will lessen the burden on the applicant insofar as providing the data required pursuant to Division Rule No. 303.D. and Form C-107-A, will provide the applicant a streamlined method for obtaining downhole commingling approvals within the San Juan 28-6 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Burlington Resources Oil & Gas Company to establish a "reference case" for (a) marginal economic criteria. (b) pressure criteria. (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 28-6 Unit, San Juan County, New Mexico, is hereby approved.