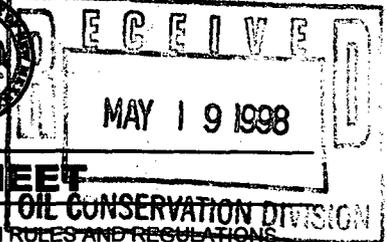


DATE IN 5/19/98	SUSPENSE 6/8/98	ENGINEER DC	LOGGED BY KV	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 2040 South Pacheco, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

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]

1968

[1] **TYPE OF APPLICATION - Check Those Which Apply for [A]**

- [A] Location - Spacing Unit - Directional Drilling
 NSL NSP DD SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

[2] **NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply**

- [A] Working, Royalty or Overriding Royalty Interest Owners
- [B] Offset Operators, Leaseholders or Surface Owner
- [C] Application is One Which Requires Published Legal Notice
- [D] Notification and/or Concurrent Approval by BLM or SLO
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] Waivers are Attached

[3] **INFORMATION / DATA SUBMITTED IS COMPLETE - Certification**

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 (including API numbers, pool codes, etc.), pertinent information and any required notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Mark W. Stodola
 Print or Type Name

Mark Stodola
 Signature

Reservoir Engr.
 Title

5/18/98
 Date

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

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

APPROVAL PROCESS:

Administrative Hearing

EXISTING WELLBORE

YES NO

APPLICATION FOR DOWNHOLE COMMINGLING

PHILLIPS PETROLEUM COMPANY 5525 Hwy. 64, Farmington, NM 87401
Operator Address
San Juan 30-5 Unit #72E Unit O, Section 10, T30N, R5W, Rio Arriba
Lease Well No. Unit Ltr. - Sec - Twp - Rge County
OGRID NO. 017654 Property Code 009258 API NO. 30-039-25676 Spacing Unit Lease Types: (check 1 or more)
Federal State (and/or) Fee

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	72319 Blanco Mesaverde		71599 Basin Dakota
2. Top and Bottom of Pay Section (Perforations)			7855' - 7979'
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 Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	a. (Current) 1030 (est.) psi b. (Original) 1294 (est.) psi	a. b.	a. 1286 psi 24 hr SI. b. 3412 (est.) psi
6. Oil Gravity (^o API) or Gas BTU Content	1020 btu/ft ³		1000 btu/ft ³
7. Producing or Shut-in?			producing
Production Marginal? (yes or no)	YES		YES
* If Shut-in, give date 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: Rates:	Date: Rates:	Date: Rates:
* If Producing, give date and oil/gas/water rates of recent test (within 60 days)	Date: estimate Rates: 400 mcf/d	Date: Rates:	Date: 4/28/98 Rates: 280 mcf/d 0 bwp/d
8. Fixed Percentage Allocation Formula - % for each zone	Oil: % Gas: %	Oil: % Gas: %	Oil: % Gas: %

9. 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? Yes No
If not, have all working, overriding, and royalty interests been notified by certified mail? Yes No
Have all offset operators been given written notice of the proposed downhole commingling? Yes No
11. Will cross-flow occur? 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. Yes No (If No, attach explanation)
12. Are all produced fluids from all commingled zones compatible with each other? Yes No
13. Will the value of production be decreased by commingling? Yes 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. Yes No
15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10771
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 Mark Stodola TITLE Reservoir Eng DATE 5/18/98
TYPE OR PRINT NAME Mark W. Stodola TELEPHONE NO. (505) 599-3455

DISTRICT I
P.O. Box 1980, Hobbs, N.M. 88241-1980

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

DISTRICT II
P.O. Drawer DD, Artesia, N.M. 88211-0719

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87504-2088

DISTRICT III
1000 Rio Brazos Rd., Aztec, N.M. 87410

DISTRICT IV
PO Box 2088, Santa Fe, NM 87504-2088

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 71599	*Pool Name Basin Dakota
*Property Code 009258	*Property Name SAN JUAN 30-5 UNIT		*Well Number 72E
*GRID No. 017654	*Operator Name PHILLIPS PETROLEUM		*Elevation 6493

¹⁰ Surface Location

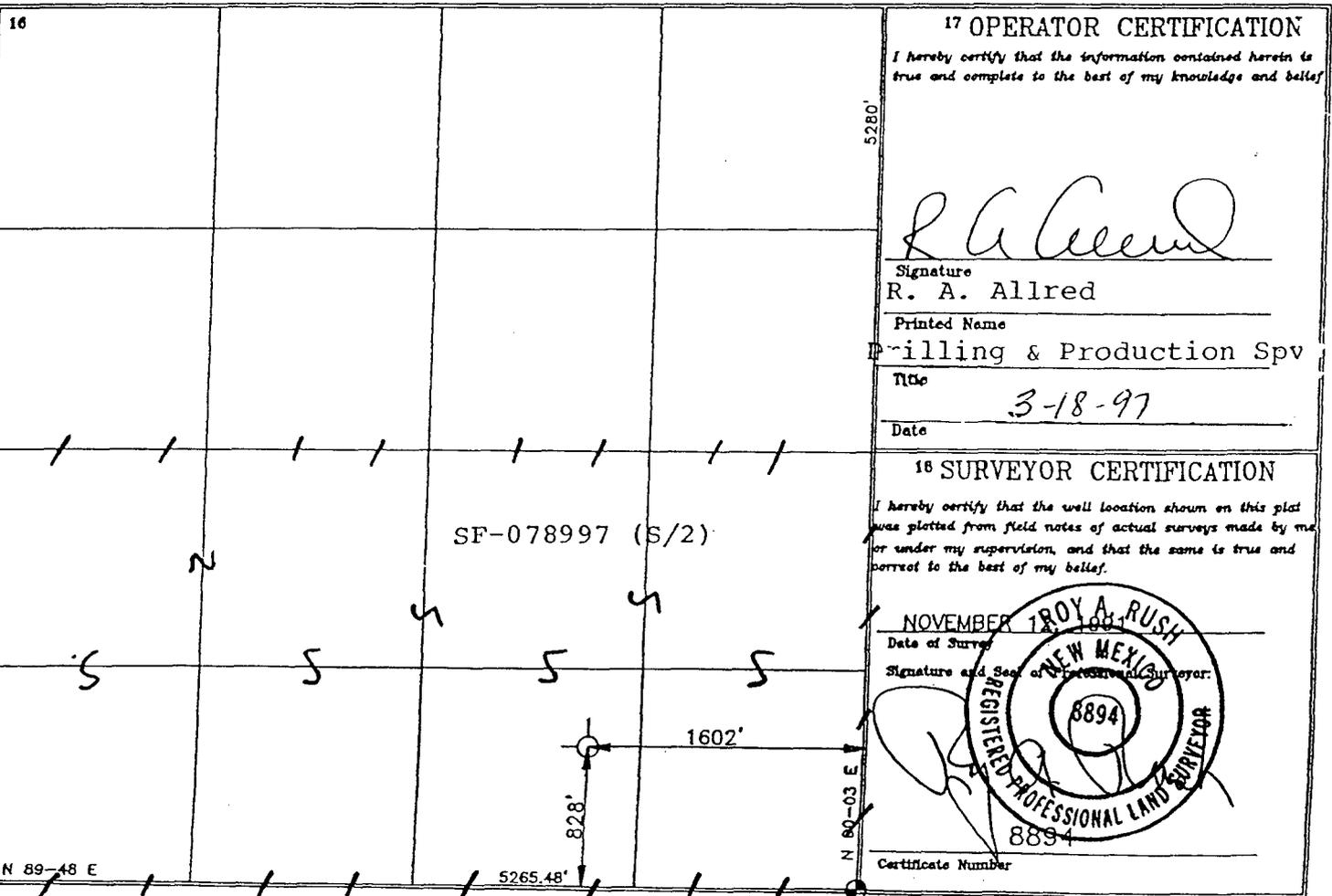
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	10	30-N	5-W		828	SOUTH	1602	EAST	RIO ARRIBA

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
0									

¹² Dedicated Acres 320 ac	¹³ Joint or Infill Y	¹⁴ Consolidation Code U	¹⁵ Order No.
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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



DISTRICT I
P.O. Box 1900, Hobbs, N.M. 88241-1900

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994

DISTRICT II
P.O. Drawer DD, Artesia, N.M. 88211-0719

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

DISTRICT III
1000 Rio Brazos Rd., Aztec, N.M. 87410

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, NM 87504-2088

AMENDED REPORT

DISTRICT IV
PO Box 2088, Santa Fe, NM 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 72319		*Pool Name Blanco Mesaverde	
*Property Code 009258		*Property Name SAN JUAN 30-5 UNIT			*Well Number 72E
*OGRID No. 017654		*Operator Name PHILLIPS PETROLEUM			*Elevation 6493

¹⁰ Surface Location

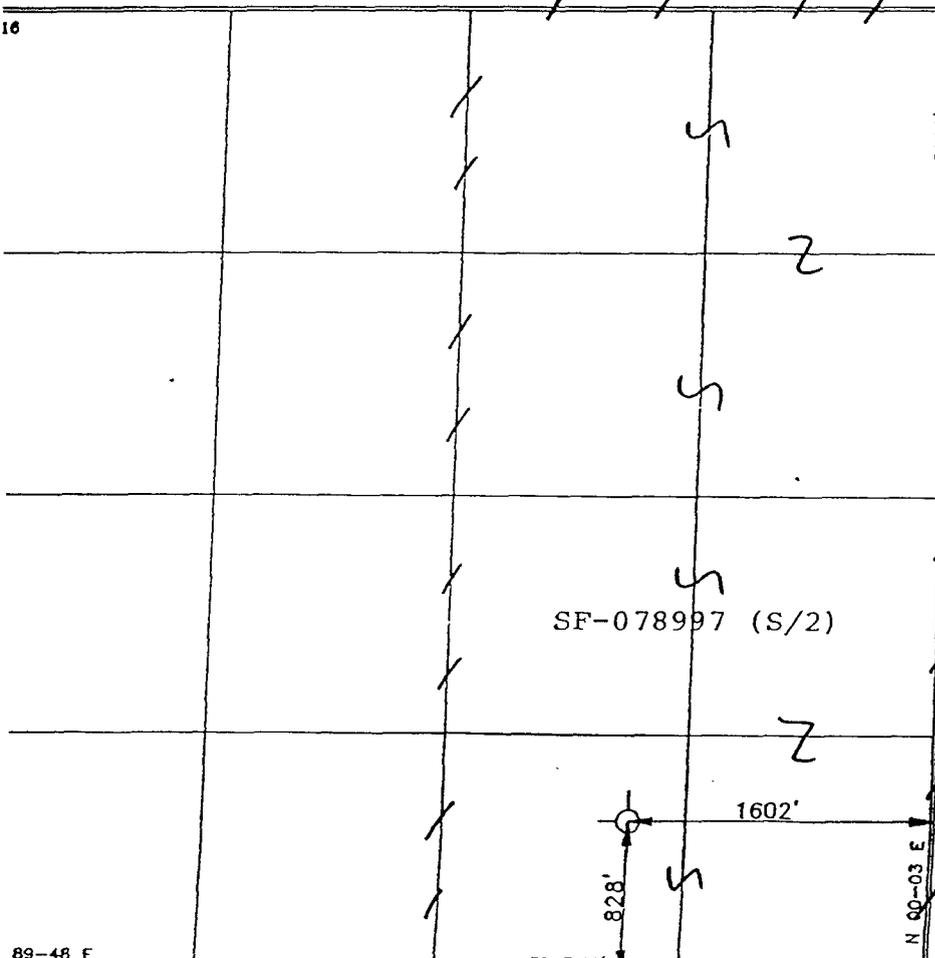
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	10	30-N	5-W		828	SOUTH	1602	EAST	RIO ARRIBA

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
0									

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
320	Y	U	

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



SF-078997 (S/2)

¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Signature: R. A. Allred
 Printed Name: R. A. Allred
 Title: Drilling & Production Supervisor
 Date: 3-18-97

¹⁸ SURVEYOR CERTIFICATION

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

Date of Survey: NOVEMBER 1991
 Signature and Seal of Registered Professional Land Surveyor:

 Certificate Number: 8894



PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401
5525 HWY. 64 NBU 3004

May 18, 1998

New Mexico Oil & Gas Conservation Div.
2040 South Pacheco
Santa Fe, New Mexico 87505-6429

Downhole Commingling Allocation Method
on the San Juan 30-5 Unit #72E

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for approximately six months after actual commingling occurs. After the six month period we will convert to the ratio method as indicated in our commingling application. We believe this will be a more accurate method of allocating production considering that the Dakota interval has been producing for several months and that the production will not be stabilized on the Mesaverde for several months.

Dakota Production Forecast

July 1998	7,682	December 1998	7,352
August 1998	7,615	January 1999	7,288
September 1998	7,305	February 1999	6,525
October 1998	7,483	March 1999	7,161
November 1998	7,178	April 1999	6,870

For example, if the total volume for December 1998 were 14,167 mcf, then the Dakota would be allocated 7,352 mcf and the Mesaverde 6,815 mcf. And subsequently, the Dakota would be allocated $(7,352/14,167)$ or 51.90%, and Mesaverde would be allocated $(6,815/14,167)$ or 48.10%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark W. Stodola
Reservoir Engineer

MS/pc

cc: OCD - Aztec
BLM- Farmington
NM Commissioner of Public Lands - Santa Fe

Dakota Production Forecast for 30-5 Unit
Well #72E

Year	Month	Gas (MCF)
Jul	1	7,682
Aug	2	7,615
Sep	3	7,305
Oct	4	7,483
Nov	5	7,178
Dec	6	7,352
1999	7	7,288
Feb	8	6,525
Mar	9	7,161
Apr	10	6,870
May	11	7,037
Jun	12	6,750
Jul	13	6,914
Aug	14	6,854
Sep	15	6,575
Oct	16	6,734
Nov	17	6,460
Dec	18	6,617

Initial Rate = 250 MCF/D

MEP81-01

PARPI - WELLZONE PRODUCTION BROWSE
MONTHLY TOTALS

Date: 5/18/98

User: MWSTODO

Wellzone F0627 02 Yr: 1997 Mth: 05 Property: 650402 SAN JUAN 30-5 DAKOTA UNIT-
Screen: 1 (1-Prod, 2-Inj, 3-Both) Well No: 000072E
Type: T (T-Total, D-Daily Avg) Field: 042233 BASIN
Period: M (M-Mnthly, Y-Yrly, C-Cum) Resvr: 20079 DAKOTA NQ

ADJ	FLG DATE	OIL (BBL)	GAS (MCF)	WATER (BBL)	PROD	OP	ST	CL	TY
	1997-05	0.00	0	0	0.00	0	86	11	2
	1997-06	0.00	0	0	0.00	0	50	11	2
	1997-07	0.00	9,204	0	31.00	31	11	11	2
	1997-08	0.00	17,231	0	31.00	31	11	11	2
	1997-09	0.00	13,212	0	30.00	30	11	11	2
*	1997-10	0.00	11,345	0	31.00	11	11	11	2
*	1997-11	0.00	9,836	0	30.00	30	11	11	2
	1997-12	0.00	9,428	0	31.00	31	11	11	2
	1998-01	0.00	7,676	0	31.00	31	11	11	2
	1998-02	0.00	8,896	0	28.00	28	11	11	2
	1998-03	0.00	8,550	0	31.00	31	11	11	2

NO MORE DATA AVAILABLE

PA1=ICE PA2=Exit PF1=Help PF3=End PF11=GRAPH
Transfer-> PF7=Backward PF8=Forward PF4=PREV SCREEN PF12=LOG GRAPH

PHILLIPS PETROLEUM COMPANY
5525 HWY 64 NBU 3004
FARMINGTON, NEW MEXICO 87401

DATE: MAY 14, 1998

WELL NAME: SAN JUAN 30-5 # 72E
FORMATION: DAKOTA

TYPE TEST: STATIC GRADIENT

COUNTY: RIO ARRIBA
STATE: NEW MEXICO

ELEVATION:	GL	CASING PRESSURE:	1070
TOTAL DEPTH:		TUBING PRESSURE:	1070
PERFORATIONS:	7955' TO 7997'	OIL LEVEL:	
TUBING SIZE:	2 3/8 TO 7832'	WATER LEVEL:	7809'
CASING SIZE:	TO	TEMPERATURE:	
PACKER:		AMERADA ELEMENT NUMBER:	87977
OTHER:		RANGE:	0-2500
		WELL STATUS:	SHUT IN 24 HRS

INDIVIDUAL WELL DATA SHEET

=====

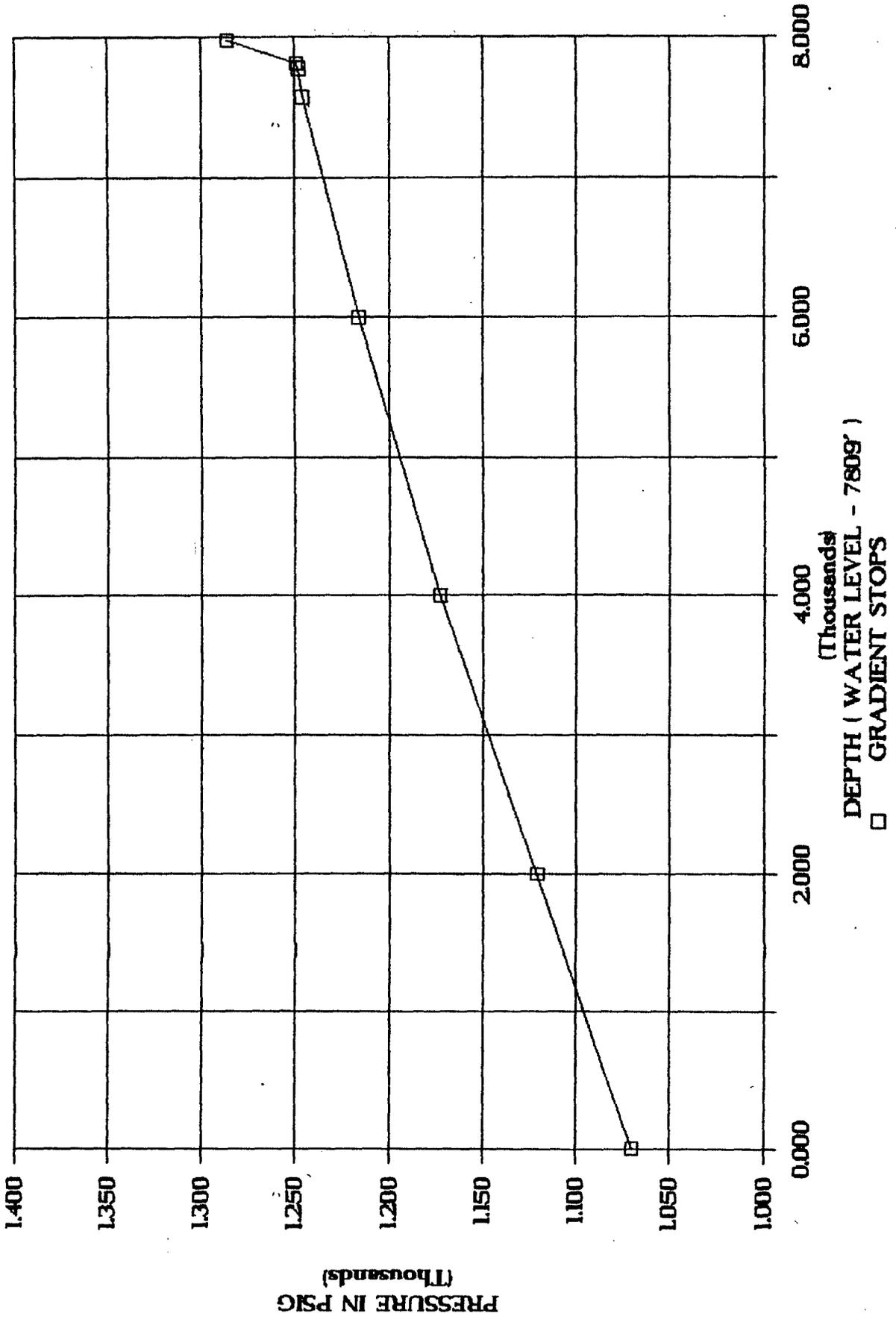
FLOWING GRADIENT TRAVERSE

DEPTH IN FEET	PRESSURE PSIG	GRADIENT PSI/FOOT
0	1070	
2000	1121	0.026
4000	1173	0.026
6000	1216	0.022
7576	1246	0.019
7776	1248	0.010
7976	1286	0.190

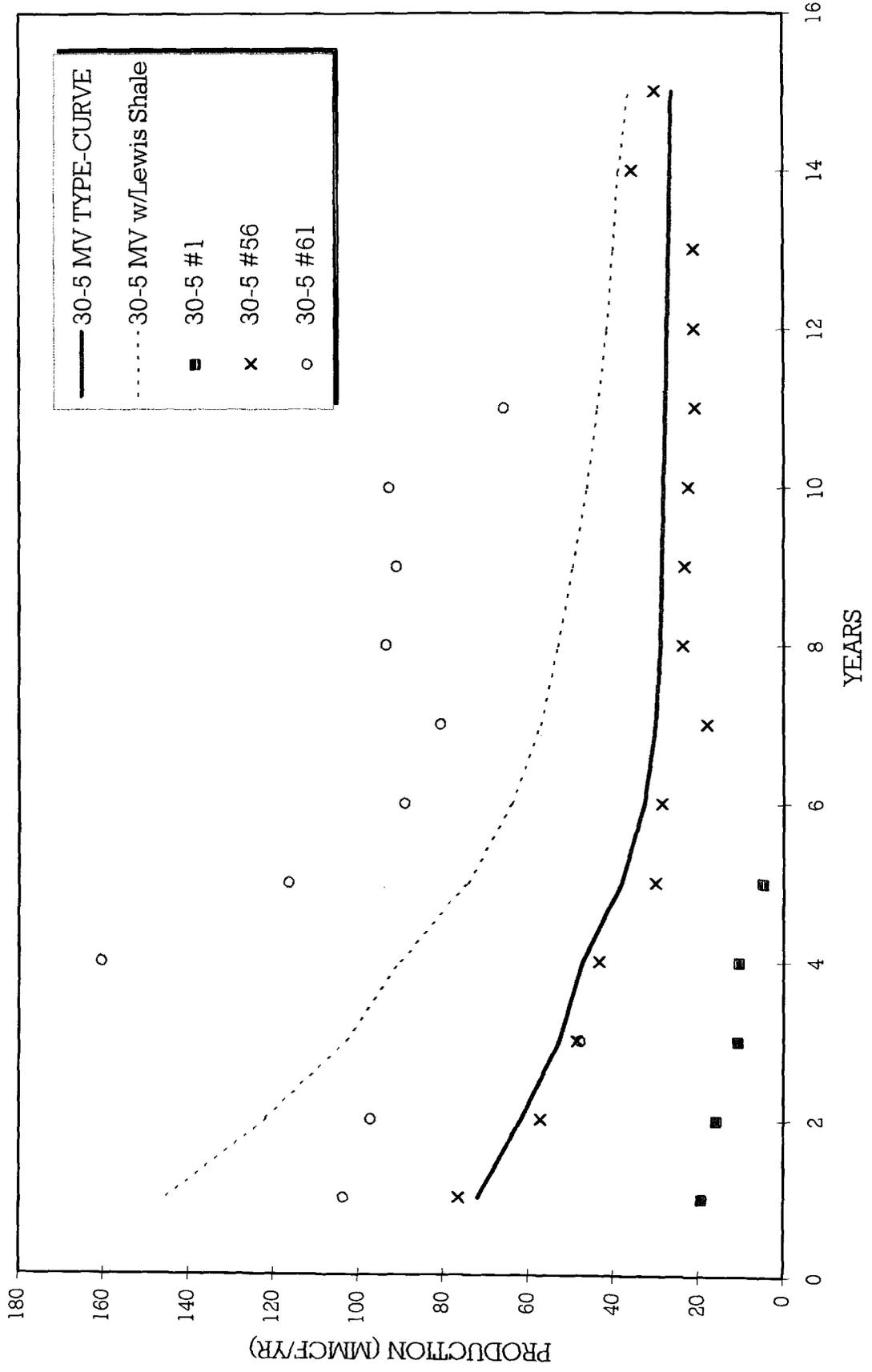
H & H WIRELINE SERVICE INC.
P. O. BOX 899
FLORA VISTA, N. MEX. 87415
OPERATOR: CHARLES HUGHES
UNIT NO. T-10

PHILLIPS PETROLEUM SAN JUAN 30-5 # 72E

DATE: 05-14-98 STATIC GRADIENT



30-5 UNIT MESAVERDE



Production Allocation Methodology

◆ Adding New Zone to Existing Zone - Initially Subtraction Method followed by Fixed Allocation Method

- Subtraction Method (+/- 1st 12 months)
 - Forecast production rate by month for existing zone utilizing established decline curve for zone
 - Subtract forecasted rate from commingled rate to define new zone rate
 - Utilize subtraction method for +/- 12 months until new zone rate stabilizes, then utilize fixed allocation method with current rates
- Fixed Allocation Method (after Subtraction Method)
 - Utilize forecasted rate from established decline curve for lower zone
 - Calculate upper zone rate by subtracting lower zone rate from commingled rate
 - Lower zone allocation = $\frac{\text{Lower zone rate}}{\text{Commingled rate}}$
 - Upper zone allocation = $\frac{(\text{Commingled rate} - \text{Lower zone rate})}{\text{Commingled rate}}$

Attachment

OCD Form C-107A (3/12/96)

Item No. 12 - additional explanation:

Based on water analysis from the Mesaverde and Dakota zones and discussions with the chemical treating/analysis company the water from these two zones are compatible. Lab analysis of the individual waters from both the Mesaverde and Dakota formations resulted in positive scaling indices for barium sulfate. There was a slight increase in the barium sulfate scaling index of the combined waters relative to the scaling index of the individual waters.

None of the waters, combined or individual, had meaningful scaling tendencies and combined with the fact that typical water production from either of these zones in San Juan 30-5 are 0-1 BWPD and no barium sulfate scale has been detected to date, no negative impacts to the formations are anticipated.