DISTRICT   O. Box 1980, Hobbs, NM 88241-1980 DISTRICT    11 South First St., Artesis, NM 88210-2835 DISTRICT     000 Rio Brazos Rd, Aztec, NM 87410-1693	State o Energy, Minerals and M OIL CONSER 2044 Santa Fe, Nev APPLICATION FOR D	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			
Phillips Petroleum Compa	iny 5	5525 Hwy. 64, Farmington,	NM 87401		
<u>San Juan 29-6 Unit</u> esse DGRID NO. <u>017654</u> Property Code	106 Well No. U 009267 API_NO	My 31 – T29N, R6W Init Ltr Sec - Twp - Rge 30–039–21039 Federal _>	Rio Arriba County Mit Lesse Types: (check 1 or mores (, 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	Blanco Mesaverde		Basin Dakota		
2. Top and Bottom of Pay Section (Perforations)	4250' 6000'		7882' - 8016'		
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	a. (Current) 600 psi (est.)	a.	a. 721 psi		
All Gas Zones: Estimated Or Measured Original	1280 psi (est.		3130 psi (est.)		
6. Oil Gravity ( <sup>°</sup> API) or Gas BTU Content	1150 BTU/mscf		1010 BTU/mscf		
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	Date: Rotes:	Date: Rates:	Date; Rates:		
<ul> <li>estimates and supporting data</li> <li>If Producing, give date andoil/gas/ water rates of recent test (within 60 days)</li> </ul>	Date: 860 mcfd Rates: 0.5 bopd (estimated)	Date: Rates:	Date: 4/30/99 Rates: 37 mcfd 0 bwpd		
8. Fixed Percentage Allocation Formula -% for each zone	Oil: Gas: 9	6 Oll: Gas: % %	Cill: Gas: %		
<ol> <li>If allocation formula is based submit attachments with sup</li> <li>Are all working, overriding, a If not, have all working, over Have all offset operators beau</li> </ol>	upon something other than porting data and/or explain and royalty interests identic riding, and royalty interest a given written potice of the	n current or past production, or is I ning method and providing rate pro cal in all commingled zones? Is been notified by certified mail? e proposed downbole commingling?	pased upon some other metho jections or other required data Yes X No X Yes No		

11. Will cross-flow occur? X Yes No If yes, are fluids compatible, will the formations not be damaged, will any crossflowed production be recovered, and will the allocation formula be reliable. X Yes No (If No, attach explanation)

ORDER NO(S). R-11187

No

12.	Are ali	produced	fluids fr	om all	commina	led zones	compatible	with e	ach other?	v	Yes
		produced	naida n		comming	100 201103	compatible	WILLI G		X	103

13. Will the value of production be decreased by commingling? \_ Yes \_<u>X</u> 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:

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 March Standala	TITLE DATE 6/8/99
TYPE OR PRINT NAME Mark Stodola	TELEPHONE NO. (505 ) 599-3455

		a de la companya de l
	. 6/11/99	BUSPENSE 7/1/99 ENGINEER DC LOGGED BY KN TYPE DHC
	1 1	
		NEW MEXICO OIL CONSERVATION DIVISION
		- Engineering Bureau -
		2040 South Pacheco, Santa Fe, NM 87505
	A	DMINISTRATIVE APPLICATION COVERSHEET
тн	IS COVERSHEET IS I	MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
Appli	cation Acronym	
		[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication]
	[DHC-Down]	hole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
	۲۵۵-۲۵۵ ۱	WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
	fEOR.Qualif	[SWD-Sait Water Disposal] [IPI-Injection Pressure Increase] fied Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
613		PDI ICATION Check Those Which Apply for [A]
[1]	[A]	Location - Spacing Unit - Directional Drilling
		JUN 1 1999
	Check	k 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]	NOTIFICAT	TION 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
	<b>[E]</b>	G For all of the above, Proof of Notification or Publication is Attached, and/or,
	<b>[F]</b>	U 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. <u>I understand that any omission of data</u> (including API numbers, pool codes, etc.), pertinent information and any required notification <u>is cause to have the application package returned with no action taken</u>.

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

 March Stodola
Signature

Mark Stodola

Print or Type Name

Reservoir Engr.

Title

6/8/99

District I PO Bex 1988, Hubbs, NM 88241-1988 District II

811 South First, Artesia, NM 88210 District III

1000 Rio Brazos Rd., Aztor, NM 87419 District IV

2040 South Pacheco, Santa Fe, NM 87505

#### State of New Mexico Energy, Maerula & Natural Resources Department

### OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

Form C-102 Revised October 18, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

		WE	ELL LO	CATIO	N AND A	ACF	REAGE DEDI	CATION PI	LAT		
API Number <sup>3</sup> Pool Code								* Poul N	ame		
30-039-21039 72319 B1					Bla	Blanco Mesaverde					
* Property (	Code		· ·		f Pro	operty	Name			•	Well Number
009257	. <b>.</b>		• 2 - 2 - 2	San	Juan 2	9–6	Unit			{ #	106
'OGRID I	No.			· · ·	' Op	crator	Name	· · · · · · · · ·			* Elevation
017654				Phillip	s Petro	leur	m Company				6822'
7 <b>61</b> 12 (M.C.) 30 4 1 4 64 5 5 4 7 2	n en	· Kern.	· · · · · · · · · · · · · · · · · · ·	• <b>•</b>	<sup>10</sup> Surf	ace	Location			:	· · · · · · · · · · · · · · · · · · ·
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			<sup>II</sup> Bot	tom Hol	e Locatio	on I	f Different Fro	om Surface		• .	
UL or lot no.	Section	Township	Range	Lot Ida	Feet from	the	North/South line	Feet from the	East/We	t line	County
м	L	L									
<sup>13</sup> Dedicated Acr	es <sup>13</sup> Joint	or Infill 🔤 🖬 🤅	Consolidatio	n Code   " (	Drder No.						
320 W/2			U		29-6 Un	it [	OHC - Order No	<b>R-11187</b>			
NO ALLOV	VABLE V	WILL BE	ASSIGNE	D TO TH	IS COMPL	ETIC	ON UNTIL ALL	INTERESTS H	IAVE BE	EN CO	NSOLIDATED
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C			L					<sup>18</sup> SURV	/EYOR	CERI	<b>TIFICATION</b>
	NM-03	)40-a		ļ		•		I hereby cert	ify that the w	rell locatio	m shown on this plat
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	1			X				and correct i	o the best of	'my belief.	
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	<sup>∞</sup>			1					1760		
				<u> </u>				Certificate N	umber		

### NEW ICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

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Form C-102 Supersedes C-128 Effective 1-1-65

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erator /010	A so wat free	CAS COMPANY	SAN JUAN 29-0	5 UNIT (1111-030)	10-A) Well No. 105
it Letter M	Section 31	Township 29-11	Range 6-11	County RIO ARI	RIEV .
ad Footage Loc 8CO	ation of Well; feet from the	SOUTH line	and 930	lect from the VESI	i ine
und Lovyel Elev. 6822	Producing Fo	DAKOFA	Pool BASEN DA	KOTA	Dedicated Acreage: 320.00 Acres
1. Outline th	e acreage dedic	ated to the subjec	ct well by colored pencil	l or hachure marks or	the plat below.
<ol> <li>If more the interest and</li> <li>If more the dated by c</li> </ol>	nan one lease is nd royalty). an one lease of communitization,	s dedicated to the different ownership unitization, force-p	well, outline each-and i o is dedicated to the wel pooling.ctc?	dentify the ownershi	of All owners been consoli
Yes If answer	[X] No If a	answer is "yes," ty owners and tract	pe of consolidation	actually been conso	lidated. (Use reverse side o
this form i No allowat forced-poo sion.	f necessary.) ble will be assig ling, or otherwise	SW 1/4 SW/4 Se ned to the well unt e)or until a non-sta	ection 31, T29N, Re il all interests have been ndard unit, eliminating s	5W a consolidated (by c uch interests, has be	ommunitization, unitization, een approved by the Commis-
	 I I				CERTIFICATION
	 .  			l here tained best a	by certify that the information con- I herein is true and complete to the if my knowledge and belief.
	 		· · · · · · · · · · · · · · · · · · ·	O.F Position	Whitenburg
				Company Nort	tion & Drilling Engi whwest Pipeline Corp.
	1			Octo	ober 25, 1974
	.   		SF-078426	I here shown notes under is tru knowl	eby certify that the well location on this plot was plotted from field of actual surveys mude by me of my supervision, and that the same we and correct to the best of my edge and belief.
990'	0,00			Date Sur Hegister and/or t	WOVENBER 29, 1971



## PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401 5525 HWY. 64 NBU 3004

June 9, 1999

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

> Downhole Commingling Allocation Method on the San Juan 29-6 Unit #106

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for approximately twelve months after actual commingling occurs. After the twelve 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 years and that the production will not be stabilized on the Mesaverde for several months.

#### **Dakota Production Forecast**

July 1999	1,235	August 1999	1,226
September 1999	1,178	October 1999	1,208
November 1999	1,160	December 1999	1,190
January 2000	1,181	February 2000	1,097
March 2000	1,164	April 2000	1,118
May 2000	1,147	June 2000	1,102

For example, if the total volume for August 1999 were 4,230 mcf, then the Dakota would be allocated 1,226 mcf and the Mesaverde 3,004 mcf. And subsequently, the Dakota would be allocated (1,226/4,230) or 28.98%, and Mesaverde would be allocated (3,004/4230) or 71.02%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Maih Atodo

Mark W. Stodola Reservoir Engineer

MS/pc

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



Mesaverde Production for Section 31-T29N-R6W

Annual Production (MCF)

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

DATE: JUNE 3, 1999

TYPE TEST: STATIC GRADIENT

WELL NAME: SAN JUAN 29-6 # 106 FORMATION: DAKOTA

COUNTY: RIO ARRIBA STATE: NEW MEXICO

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TOTAL DEPTH:CASING PRESSURE:PERFS:TUBING PRESSURE:600TUBING SIZE:1 1/2 TO 8013'OIL LEVEL:CASING SIZE:WATER LEVEL:PACKER:PACKER:TEMPERATURE:OTHER: SN @ 7981'ELEMENT NO.ENGAGED @ 02:16ELEMENT RANGE 0 TO 3500

i

#### WELL STATUS: SHUT IN

DEPTH IN	PRESSURE	GRADIENT
FEET	PSIG	PSI/FOOT
0	600	
2000	632	0.016
4000	660	0.014
6000	<b>691</b>	0.015
7581	713	0.014
7781	717	0.020
7981	721	0.020

#### RAN SLM @ 7981'

H & H WIRELINE SERVICE INC. P. O. BOX 899 FLORA VISTA, NEW MEXICO 87415 OPERATOR: STEVEN HODGES UNIT NO. T-8



PHILLIPS PETROLEUM SAN JUAN 29-6 # 106 DATE: JUNE 3, 1999

# 29-6 Unit #106 Dakota Forecast

Initial Production Rate	=	40 MCFD	
Hyperbolic Exponent	=	0.33	
Decline Rate	=	9%	

	Month	Monthly
		MCF
1999	Jul	1,235
	Aug	1,226
	Sep	1,178
	Oct	1,208
	Nov	1,160
	Dec	1,190
2000	Jan	1,181
	Feb	1,097
	Mar	1,164
	Apr	1,118
	May	1,147
	Jun	1,102
	Jul	1,130
	Aug	1,122
	Sep	1,078
	Oct	1,106
	Nov	1,062
	Dec	1,090

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MEP81-01 Wellzone : Screen: 1 Type: D Period: Y	L9958 01 (1-Prod (T-Tota (M-Mnth)	PARPI - W DAI Yr: 1991 Mt , 2-Inj, 3-B l, D-Daily A ly, Y-Yrly,	ELLZONI LY AVEI h: 05 oth) vg) C-Cum)	E PRODUC RAGE BY Property Well No Field: Resvr:	FION BR YEAR y: 6502 : 0001 0422 200	20WSE 266 SAN 206 33 BAS 276 DAN	Da U JUAN 29-0 SIN KOTA	ate: 6 ser: M 6 UNIT	/08/99 WSTODO 'DK #106
ADJ			PRODUC	CED			DAYS		- WELL -
FLG DATE		OIL (BBL)	GAS	(MCF)	WATER	(BBL)	PROD	OP	ST CL TY
1991	IC	0.00		110		0	135.04	136	
1992		0.00		81		0	349.00	354	
1993		0.00		65		0	352.00	352	
1994		0.00		61		0	359.00	359	
1995		0.00		55		0	361.00	361	
1996		0.00		59		0	356.00	356	
1997		0.00		79		0	320.00	320	
1998		0.00		70		0	365.00	365	
1999		0.00		47		0	120.00	120	

NO MORE DATA AVAILABLE

PA1=ICE	PA2=Exit	PF1=Help	PF3=End	PF5=INITIAL CUM	PF11=GRAPH	
Transfer-	>	PF7=Backward	PF8=Forward	PF4=PREV SCREEN	PF12=LOG GRAPH	

Page: 1 Document Name: Tcpip\_1

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MEP81-01 Wellzone L9 Screen: 1 Type: D Period: M	PARPI - E 9958 01 Yr: 1998 (1-Prod, 2-Inj, 3 (T-Total, D-Daily (M-Mnthly, Y-Yrly	WELLZONH AILY AVEN Mth: 05 -Both) Avg) , C-Cum)	E PRODUCT RAGE BY M Property Well No: Field: Resvr:	TION BR IONTH : 6502 0001 0422 200	OWSE 66 SAN 06 33 BAS: 76 DAK	D U JUAN 29- IN DTA	ate: 6/ ser: MW 6 UNIT	08/99 STODO DK #10	06
ADJ		PRODUC	CED			DAYS		WELL	_
FLG DATE	OIL (BBL)	GAS	(MCF)	WATER	(BBL)	PROD	OP S	r cl '	ΤY
1998-05	0.00		77		0	31.00	31 1	1 03 3	2
1998-06	0.00		65		0	30.00	30 1	1 03 :	2
1998-07	0.00		100		0	31.00	31 1	1 03 3	2
1998-08	0.00		83		0	31.00	31 1	1 03 3	2
1998-09	0.00		60		0	30.00	30 1	1 03 :	2
1998-10	0.00		77		0	31.00	31 1	1 03 :	2
1998-11	0.00		69		0	30.00	30 1	1 03 :	2
1998-12	0.00		54		0	31.00	31 1	1 03 2	2
1999-01	0.00		60		0	31.00	31 1	1 03 2	2
* 1999-02	0.00		52		0	28.00	28 1	1 03 :	2
1999-03	0.00		39		0	31.00	31 1	1 03 :	2
1999-04	0.00		37		0	30.00	30 1	1 03 3	2
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Transfer-:	> PF7=Ba	.ckward I	PF8=Forwa	rd PF	4=PREV	SCREEN	PF12=LO	G GRA	PH

Exhibit 3.2

# Production Allocation Methodology

- Adding New Zone to Existing Zone Initially Subtraction Method followed by Fixed Allocation Method
  - Subtraction Method (+/- 1st 12 months)

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- 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 = <u>Lower zone rate</u> Commingled rate
  - Upper zone allocation = (Commingled rate - Lower zone rate) / 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.