DATE 81 12/17/99 SUSPENSE 1	16/00}	ENGINEER DC	LOOGED A	THE DHC
	T		······································	

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

ADMINISTRATIVE APPLICATION COV

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

Αı	opli	cation	Acr	onyms:
----	------	--------	-----	--------

[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]

	[EOR-Qu	_					essure Increas -Positive Prod	se] uction Respons	:e]
[1]	TYPE OF A			eck Those y Unit - Di DD				DEC	
	Chec [B]	ck One Only Commir DHC		nd [C] orage - Me PLC	easureme PC	ent OLS	OLM	DEG 7 1989	
	[C]	Injection WFX	a - Disposa PMX	al - Pressu SWD	re Increa IPI	se - Enha EOR	nced Oil Rec	overy	
[2]	NOTIFICA [A]						Apply, or Dorest Owners	oes Not Apply	
	[B]	Offset (Operators,	Leasehold	lers or S	urface Ov	vner		
	[C]	Applica	tion is On	e Which F	Requires	Publishe	d Legal Notic	е	
	[D]						BLM or SLO	ð	
	[E]	For all	of the abo	ve, Proof	of Notific	cation or	Publication is	Attached, and	/or
	[F]	Waiver	s are Attac	ched					

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

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: Statemen must be completed by an i	ndividual with supervisory capacity.
Peggy Cole	Deggy (sto	Regulatory/Compliance Administrator
Print or Type Name	Signature	Title

Date

DISTRICT I 1625 N. French Dr., Hobbs, NM 88240 DISTRICT II **DISTRICT III** . Rd. Aztec. NM 87410 DISTRICT IV Santa Fe. NM 87505

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

__ YES __X_ NO

APPROVAL PROCESS:

_ Administrative ___Hearing **EXISTING WELLBORE**

APPLICATION FOR DOWNHOLE COMMINGLING

BURLINGTON RESOURCES OIL & GAS COMPANY PO BOX 4289, FARMINGTON, NM 87499 SAN JUAN 27-5 UNIT 142M D 33-27N-05W **RIO ARRIBA** Spacing Unit Lease Types: (check 1 or more) __14538___ _ Property Code_ 7454 API NO. 30-039-XXXXX Federal __X__ , State _ _, (and/or) Fee The following facts are submitted in support of downhole commingling: BLANCO MESAVERDE - 72319 BASIN DAKOTA - 71599 Pool Name and Pool Code WILL BE SUPPLIED UPON COMPLETION 2. Top and Bottom of Pay Section (Perforations) WILL BE SUPPLIED UPON COMPLETION 3. Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) **FLOWING FLOWING** a. (Current) a. (Current) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current 661 psi (see attachment) 847 psi (see attachment) Gas & Oil - Flowing: Measured Current b. ^(Oriiginal) b. (Oriiginal) All Gas Zones: Estimated Or Measured Original 1290 psi (see attachment) 3105 psi (see attachment) 6. Oil Gravity (EAPI) or Gas BTU Content **BTU 1155** BTU 1190 7. Producing or Shut-In? SHUT-IN SHUT-IN NO YES Production Marginal? (yes or no) Date: N/A Date: N/A Date: N/A Rates: Rates: Rates: 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: N/A Date: N/A Date: N/A If Producing, give date andoil/gas/ water rates of recent test (within 60 days) Rates: Rates: Rates: Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: Oil: WILL BE SUPPLIED UPON COMPLETION WILL BE SUPPLIED UPON COMPLETION 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? ____Yes _X_ No ___Yes __X_ No _X_ Yes No If yes, are fluids compatible, will the formations not be damaged, will any cross-11. Will cross-flow occur? flowed production be recovered, and will the allocation formula be reliable. _X_ Yes ___ No (If No, attach explanation) 12. Are all produced fluids from all commingled zones compatible with each other? _X_ Yes _ 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-10694 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 working, overriding, and royalty interests for uncommon interest cases.

* Any additional statements, data, or documents required to support commingling.

TYPE OR PRINT NAME SEAN E. CORRIGAN

SIGNATURE

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

TELEPHONE NO. 505-326-9700

TITLE PRODUCTION ENGINEER

DATE:

12/10/99

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

Revised February 21, 1994 Instructions on back Submit to Appropriate District Office State Lease – 4 Copies Fee Lease – 3 Copies

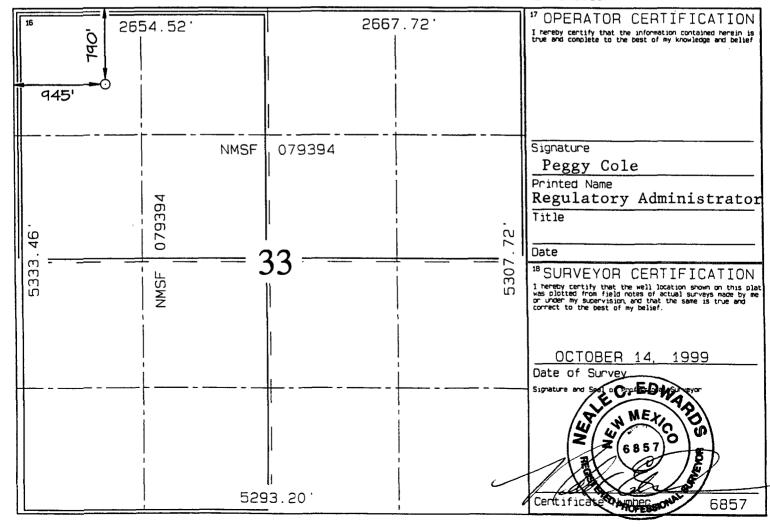
AMENDED REPORT

Form C-102

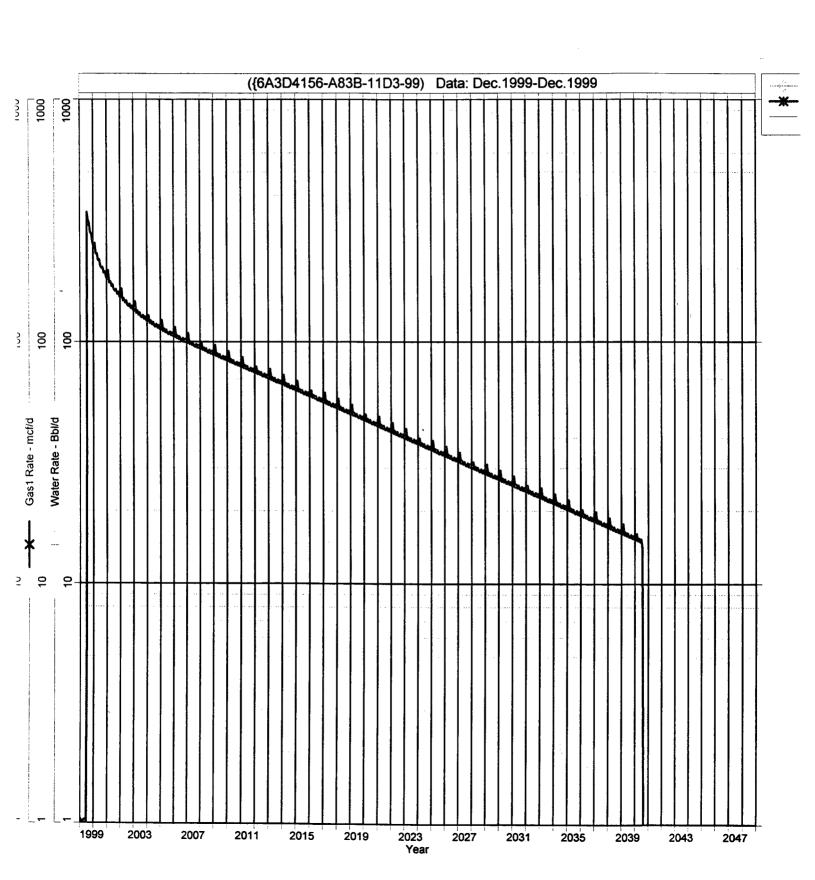
WELL LOCATION AND ACREAGE DEDICATION PLAT

	PI Number	r	722	Pool Code Plance Messyando/Resin Delecte					_	
30-039	_		72319/71599 Blanco Mesaverde/Basin Dakota						a	
'Property	Code				*Prop	erty Name		- W	"Well Number	
7454				S	AN JUAN	1 27-5 UNIT			142M	
'OGRID N	NO .				*Oper:	ator Name		9	Elevation	
14538			BURLINGTON RESOURCES OIL & GAS COMPANY				6481			
¹⁰ Surface Location										
UL or lot no.	Section	Township	Range	Lot Ion	Feet from t	he North/South lin	Feet from the	East/West line	County	
D	33	27N	5W		790	NORTH	945	WEST	RIO ARRIBA	
		11 B	ottom	Hole L	ocation	If Differer	it From Surf	ace		
UL or lot no.	Section	Township	Range	Lot Ion	Feet from t	he North/South lin	e Feet from the	East/West line	County	
12 Dedicated Acres		13 Joint or In	fill 14 Cons	colidation Code	¹⁵ Order No					
MV;DK-N	/320									

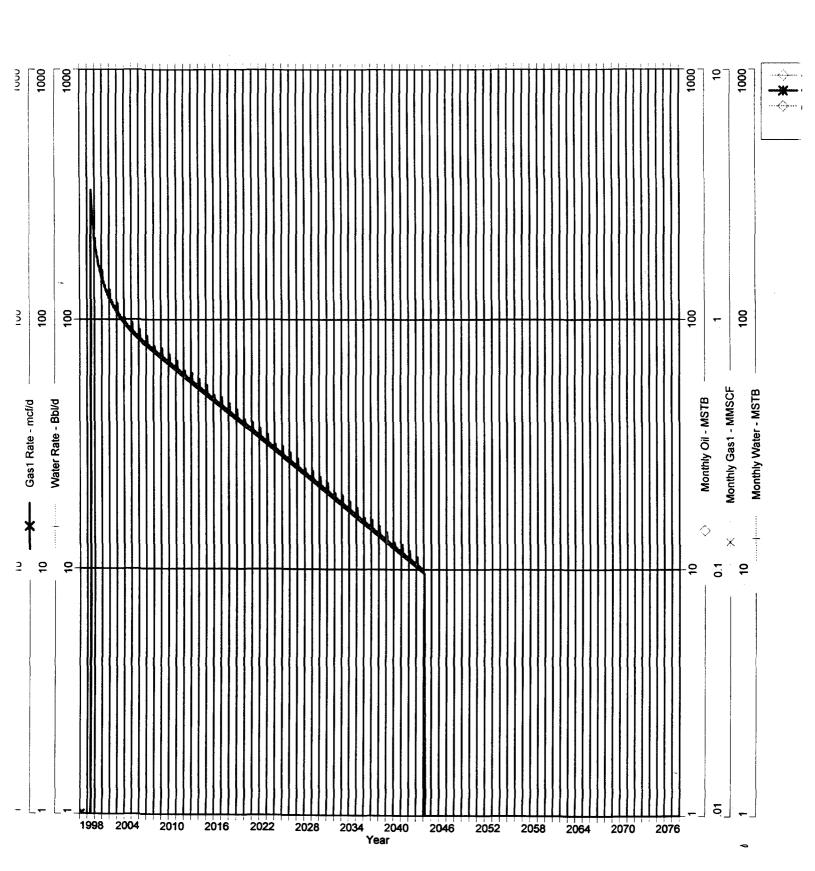
NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



San Juan 27-5 Unit #142M
Expected Production
Mesaverde Formation



San Juan 27-5 Unit #142M Expected Production Dakota Formation



San Juan 27-5 Unit #142M

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 0.676 COND. OR MISC. (C/M) C %N2 0.46 %CO2 0.19 %H2S 0 DIAMETER (IN) 2 DEPTH (FT) 5454 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 137 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 576 BOTTOMHOLE PRESSURE (PSIA) 660.6	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.18 %CO2 0.97 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) 198 FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 846.8			
MV-Original	<u>DK-Original</u>			
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) D.676 C 0.676 C D.466 0.466 0 0 0 1137 5454 5454 5454 5457 60 60 60 60 60 60 60 60 60 6	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 0.97 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3104.9			

Page No.: 1

Print Time: Wed Dec 01 15:49:33 1999
Property ID: 1440
Property Name: SAN JUAN 27-5 UNIT | 35 | 53366B
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

	CUM_GAS		
06/02/58	0	1110.0	San Juan 27-5 Unit #142M
10/07/58	0	1109.0	
09/22/59	30000	827.0	Mesaverde Offset
05/29/60	55000	727.0	
05/28/61	81000	718.0	
03/07/62	99000	697.0	
03/19/63	119000	670.0	
04/06/64	139000	669.0	
09/24/65	167000	614.0	
04/12/66	175000	641.0	
05/16/67	189000	576.0	
05/02/68	197000	612.0	
08/28/70	223045	574.0	
04/08/71	233904	541.0	
07/25/72	252818	499.0	
09/30/81	364714	560.0	
04/07/86	396629	579.0	
11/27/89	432695	597.0	
07/28/91	444943	614.0	
07/30/91	444943	602.0	
06/01/93	465346	576.0	

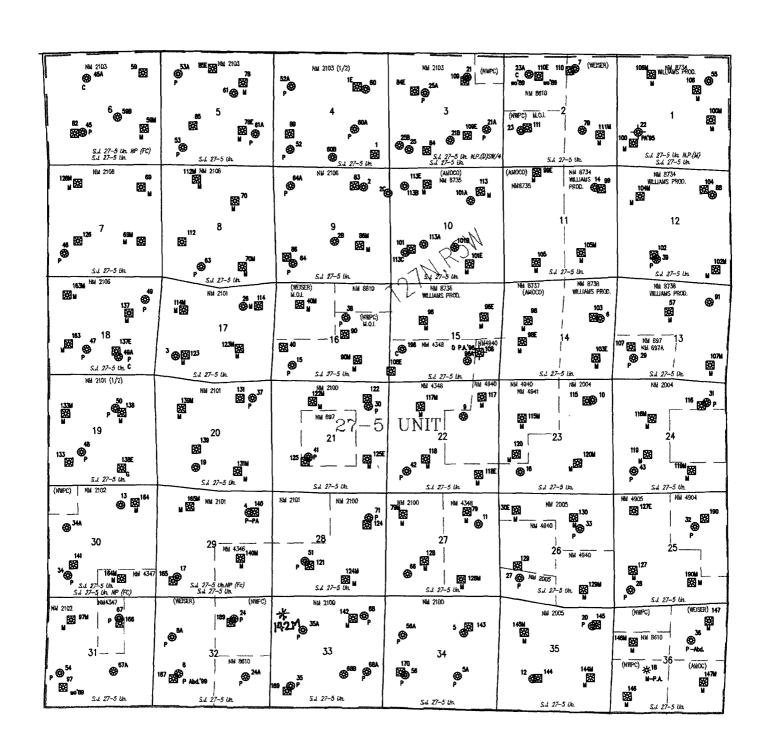
Page No.: 1

Print Time: Wed Dec 01 15:49:40 1999

Property ID: 1392
Property Name: SAN JUAN 27-5 UNIT | 169 | 44055A
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

DATE	CUM_GAS		
10/16/73 11/09/73 01/28/74 07/01/74 06/10/75 07/12/76 08/08/77 05/02/79 06/04/81 09/22/83 03/22/84 11/06/85 10/11/88 05/29/90 07/29/92	82049 151241 217490 269957 330316 388242 435841 448074 497253 573308 620033	983.0 792.0 798.0 867.0 823.0 983.0 910.0 921.0 773.0 737.0	San Juan 27-5 Unit #142M Dakota Offset
01/29/92	672125	706.0	

San Juan 27-5 Unit #142M 27N - 5W - 33 Mesaverde / Dakota



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. 11626 ORDER NO. R-10694

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 27-5 UNIT PURSUANT
TO DIVISION RULE 303.E AND THE ADOPTION
OF SPECIAL ADMINISTRATIVE RULES THEREFOR.
SAN JUAN COUNTY, NEW MEXICO.

PIO ARRIBA

ORDER OF THE DIVISION

BY THE DIVISION:

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.

EINDS 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 27-5 Unit, San Juan County, New Mexico.
- (3) Division Rule No. 303.E., amended by Order No. R-10470-A. currently states:

"If sufficient data exists on a lease, pool, formation, geographic area, em., so as to render it unnecessary to repeatedly provide such data on Form C-107-A, an operator may except any of the various criteria required under Paragraph 303.D, of this rule by establishing a "reference case". The Division, upon its own motion, or by application from an operator, may establish "reference cases" either administratively or by hearing. Upon Division approval of such "reference cases" for specific criteria, subsequent applications to downhole commingie (Form C-107-A) will be required only to cite the Division order number which established such exceptions and shall not be required to submit data for those criteria."

- (4) The applicant is the current operator of the San Juan 27-5 Unit which encompasses some 23.043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.
- (5) Within the San Juan 27-5 Unix, the applicant currently operates one hundred and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and four (4) Basin-Fruitland Coal Gas Pool wells.
 - (6) According to its evidence and testimony, Burlington seeks to:
 - establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations whereby these formations and/or pools may be identified as "marginal" on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit. The applicant further proposes that the data provided in the immediate case serve as supplemental data or confirmation that these formations and/or pools should be classified as "marginal":
 - b) establish a "reference case" for pressure criteria in the Dakota and Pictured Cliffs formations whereby the Division may utilize data provided in the immediate case to verify the pressure data provided on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit:

- establish a "reference case" whereby the Division unitizes 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 27-5 Units and
- d) establish a "reference case" or an administrative procedure for authorizing the downhole communicing of existing or future drilled wells within the San Juan 27-5 Unit without additional nonce to each affected unterest 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 27-5 Unit:
 - a) the structure and thickness of the Dakota and Pictures Cliffs formations are very consistent:
 - b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 583 MMCFG and 426 MMCFG, respectively;
 - c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 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 27-5 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 27-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- a) the average sinut-in bottominoic pressure within the Dakota and Pictured Cliffs formations at the time of initial development were approximately 3.141 psi and 1.118 psi, respectively; and.
- b) the average current shut-in bottominole pressure within the Dakota and Pictured Cliffs formations are approximately 1.032 pst and 441 pst. respectively.
- (10) There is sufficient pressure data available within the San Juan 27-5 Unit so as to except pressure criteria as proposed by the applicant.
- (11) The applicant testified that various allocation methods will be utilized for downnole commingled wells within the San Juan 27-5 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:
 - the subtraction method will likely be utilized in those instances involving the Basin-Fruitiand Coal Gas Pool and in those instances where a zone with a well established decline rate is commingled with a newly completed zone:
 - b) a fixed allocation formula will be unilized in those instances where production history for both zones is available, or in those instances where newly completed zones are tested and stabilized flow rates obtained.
 - (12) The allocation methods proposed by the applicant are routinely utilized by industry and approved by the Division and therefore the proposal to except allocation formulas should be approved.
 - (13) In support of its request to establish a "reference case" or administrative procedure for providing notice within the San Juan 27-5 Unit the applicant presented evidence and testimony which indicates that:
 - a) the interest ownership between two zones within a given wellbore in the San Juan 27-5 Unit is generally not common:
 - b) pursuant to Division Rule No. 303.D., applicant is currently required to notify all interest owners within the San Juan 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit:

- c) providing notice to each interest owner within the San Juan 27-5
 Unit of subsequent downnote communitings is unnecessary and is
 an excessive burden on the applicant:
- d) the downhole commingting of wells within the San Juan 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole comminging of wells within the San Juan 27-5 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 27-5
 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 compiled 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 comminging approvals within the San Juan 27-5 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 downhold comminging of Dakota. Mesaverde. Fruitiand Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit. San Juan County New Mexico. is hereby approved.

- (2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole communited within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictures Cliffs and Dakota formations as "marginal", supporting data to verify the Pictures Cliffs and Dakota pressure information provided, and support or justification for utilizing a given method or formula for allocation of production, provided however, in the event any of the data described above appearing on Form C-107-A appears to be beyond the data range provided in this case, the Division may require the submittal of additional supporting data.
- (3) In order to obtain Division authorization to downhole commingle wells within the San Juan 27-5 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Azere Offices of the Division. Such application shall commin all 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 San Juan 27-5 Unit of such proposed comminging.
- (4) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Sama Fe. New Mexico. on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM I LEMAY

Director