

ABOVE THIS LINE FOR DIVISION USE ONLY

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



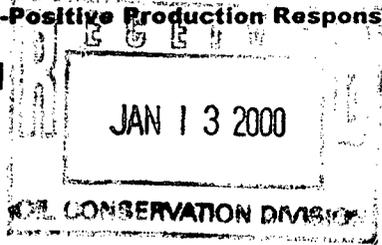
Handwritten initials/signature

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]



[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 Stodola _____ Reservoir Engr. _____ 1/11/99
 Print or Type Name Signature Title 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

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

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505-8429

APPROVAL PROCESS:

Administrative Hearing

EXISTING WELLBORE

YES NO

APPLICATION FOR DOWNHOLE COMMINGLING

Operator Phillips Petroleum Company Address 5525 Hwy 64, Farmington, NM 87401

Lease San Juan 29-6 Unit Well No. #53 Unit Ltr. - Sec - Twp - Rge B, Sec. 31, T29N, R6W County Rio Arriba

OGRID NO. 017654 Property Code 009257 API NO. 30-039-07509 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	72439 S. Blanco PC		72319 Blanco Mesaverde
2. Top and Bottom of Pay Section (Perforations)	3254' - 3380'		4020' - 5514'
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: Gas & Oil - Flowing: All Gas Zones: Estimated Current Measured Current Estimated Or Measured Original	a. (Current) 919 psi	a.	a. 372 psi (est.)
	b. (Original) 1200 psi (est.)	b.	b. 1280 psi (est.)
6. Oil Gravity ($^{\circ}$ API) or Gas BTU Content	1100 btu/scf		1200 btu/scf
7. Producing or Shut-in?	Producing		shut-in
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 * If Producing, give date and oil/gas/water rates of recent test (within 60 days)	Date: Rates:	Date: Rates:	Date: 10/30/99 Rates: 163 mcf/d, 0 bwp/d
	Date: 1/9/00 Rates: 250 mcf/d, 0 bwp/d	Date: Rates:	Date: Rates:
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-11187

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 Engr. DATE 1/11/00

TYPE OR PRINT NAME Mark Stodola TELEPHONE NO. (505) 599-3455

District I
PO Box 1900, Hobbs, NM 88241-1900

District II
811 South First, Artesia, NM 88210

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & 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

RECEIVED
BLM

99 OCT 26 PM 4:54 AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-039-07509		Pool Code 72439	Pool Name So. Blanco Pictured Cliffs, Ext.
Property Code 009257	Property Name San Juan 29-6 Unit		Well Number 53
OGRID No. 017654	Operator Name Phillips Petroleum Company		Elevation 6428'

10 Surface Location

UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
B	31	29N	6W		790'	North	1730	East	Rio Arriba

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
B									

Dedicated Acres 320 E/2	Joint or Infill Y	Consolidation Code C	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

<p>16</p> <p>SF-078426 2200.0 acres</p> <p>Section 31</p> <p>NM-0304-A</p>	<p>17 OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p> <p><i>Patsy Clugston</i> Signature Patsy Clugston Printed Name Regulatory Assistant Title October 26, 1999 Date</p>
	<p>18 SURVEYOR CERTIFICATION</p> <p>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.</p> <p>7-18-56 Date of Survey Signature and Seal of Professional Surveyor: See plat signed by Ernest V. Echohawk Reg. No. 1545 Certificate Number</p>

**NEW MEXICO
OIL CONSERVATION COMMISSION**

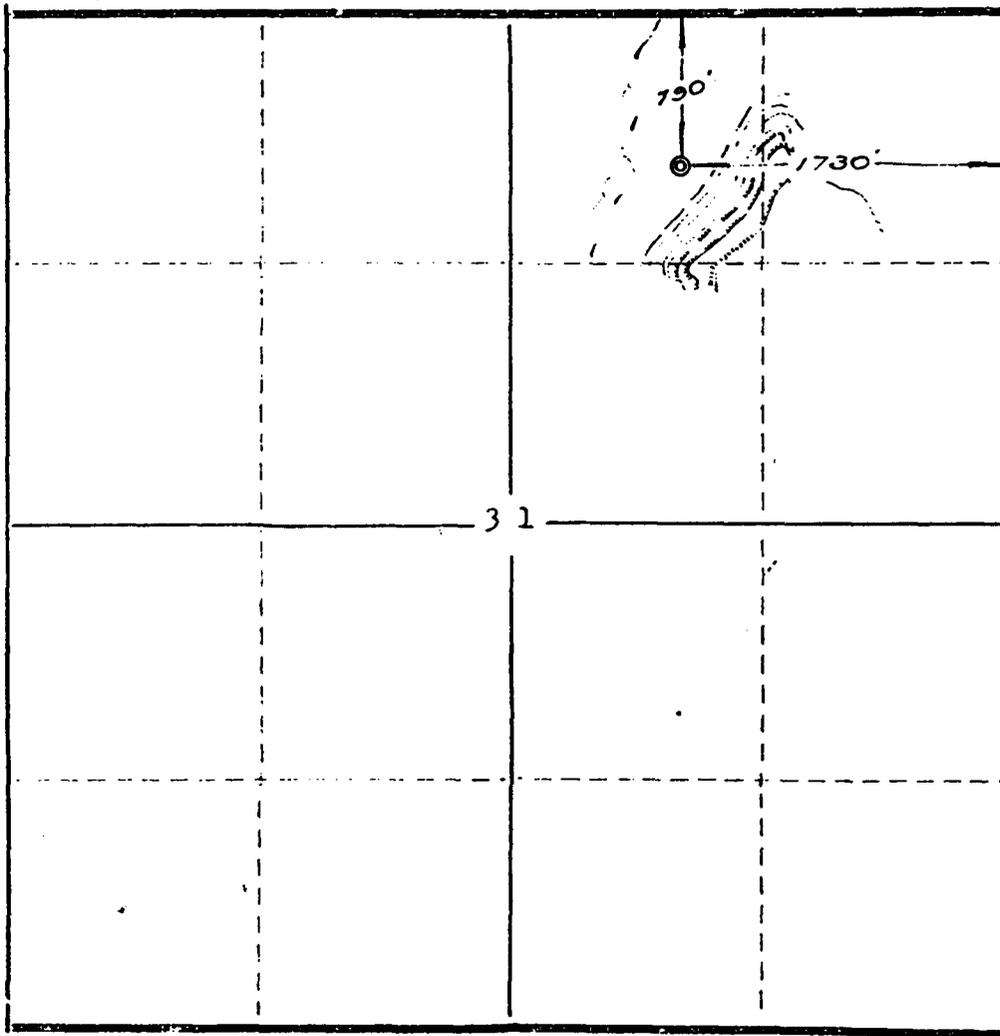
Form C-128

Well Location and/or Gas Proration Plat **RECEIVED**
BLM Date

Operator Pacific Northwest Pipeline Corporation Lease 99 OCT 26 1956 Unit 29-6
 Well No. 53 Section 31 Township 29 North Range 4805 West NMPM
 Located 790 Feet From North Line, 1730 Feet From East Line,
Rio Arriba County, New Mexico. G. L. Elevation 6428

Name of Producing Formation Blanco Mesaverde Pool _____ Dedicated Acreage _____

(Note: All distances must be from outer boundaries of Section)



NOTE
This section of form is to be used for gas wells only.

SCALE: 1" = 1000'

1. Is this Well a Dual Comp. ? Yes No .

2. If the answer to Question 1 is yes, are there any other dually completed wells within the dedicated acreage?
 Yes No .

Name _____
 Position _____
 Representing _____
 Address _____

This is to certify that the above plat was prepared from field notes of actual surveys made by me under my supervision and that the same are true and correct to the best of my knowledge and belief.

Date Surveyed July 18, 1956
Ernest V. Echohawk
 Ernest V. Echohawk
 Reg. Land Surveyor, N. Mex., Reg. No. 1545



PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401
5525 HWY. 64 NBU 3004

January 11, 2000

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 #53

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 Mesaverde interval has been producing for years and that the production will not be stabilized on the Pictured Cliffs for several months.

Pictured Cliffs Forecast

February 2000	7,278	March 2000	7,885
April 2000	7,463	May 2000	7,544
June 2000	7,241	July 2000	7,220
August 2000	7,063	September 2000	6,783
October 2000	6,766	November 2000	6,499
December 2000	6,486	January 2001	6,350

For example, if the total volume for March 2000 were 12,938 mcf, then the Pictured Cliffs would be allocated 7,885 mcf and the Mesaverde 5,053 mcf. And subsequently, the Pictured Cliffs would be allocated (7,885/ 12,938) or 60.94%, and Mesaverde would be allocated (5,053/12,938) or 39.06%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark W. Stodola
Reservoir Engineer

MS/pc

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

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

DATE: DECEMBER 14, 1999

WELL NAME: SAN JUAN 29-6 # 53
FORMATION: PICTURE CLIFF

TYPE TEST: STATIC GRADIENT

COUNTY: RIO ARRIBA
STATE: NEW MEXICO

TOTAL DEPTH:
PERFS: MID PERF 3317'
TUBING: 2 3/8" TO 3342'
CASING SIZE:
PACKER:
OTHER: 1.81" FN @ 3329'
PRESSURED UP @ 08:45

CASING PRESSURE:
TUBING PRESSURE: 830
OIL LEVEL:
WATER LEVEL:
TEMPERATURE:
ELEMENT NO. 86484
ELEMENT RANGE 0 TO 3000

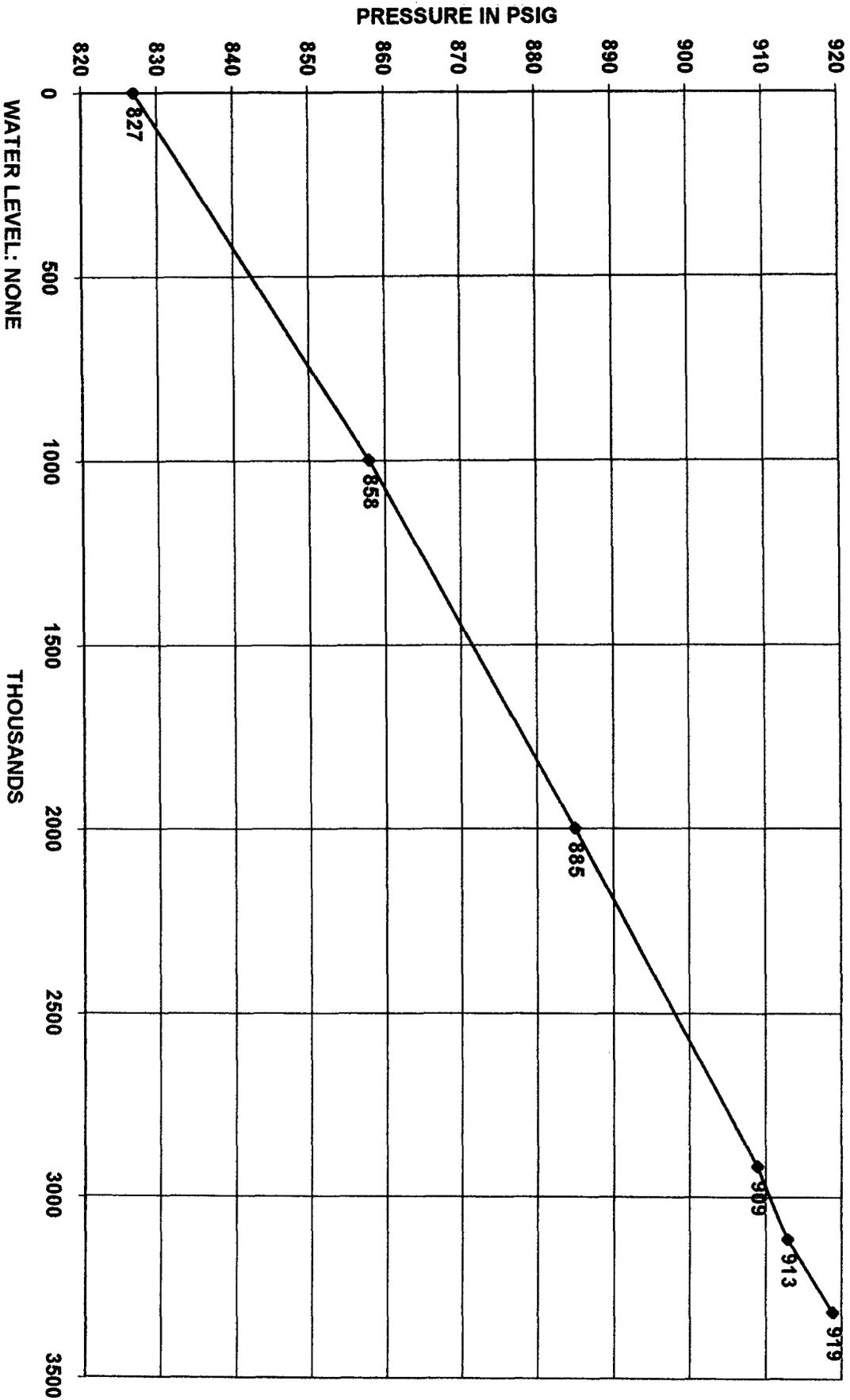
WELL STATUS: SHUT IN

DEPTH IN FEET	PRESSURE PSIG	GRADIENT PSI/FOOT
0	827	
1000	858	0.031
2000	885	0.027
2917	909	0.026
3117	913	0.020
3317	919	0.030

SLM @ 3329'

H & H WIRELINE SERVICE INC.
P. O. BOX 899
FLORA VISTA, NEW MEXICO 87415
OPERATOR: CHARLES HUGHES
UNIT NO. T-11

PHILLIPS PETROLEUM SAN JUAN 29-6 # 53
DATE: DECEMBER 14, 1999



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

DATE: NOVEMBER 23, 1999

WELL NAME: SAN JUAN 29-6 # 53
FORMATION: MESA VERDE

TYPE TEST: STATIC GRADIENT

COUNTY: RIO ARRIBA
STATE: NEW MEXICO

TOTAL DEPTH: 5645'
PERFS: 5034' TO 5600'
TUBING: 2 3/8 TO 5579'
CASING SIZE:
PACKER:
OTHER:
PRESSURED UP @ 10:45

CASING PRESSURE:
TUBING PRESSURE: 295
OIL LEVEL:
WATER LEVEL: 5389'
TEMPERATURE:
ELEMENT NO. 86484
ELEMENT RANGE 0 TO 3000

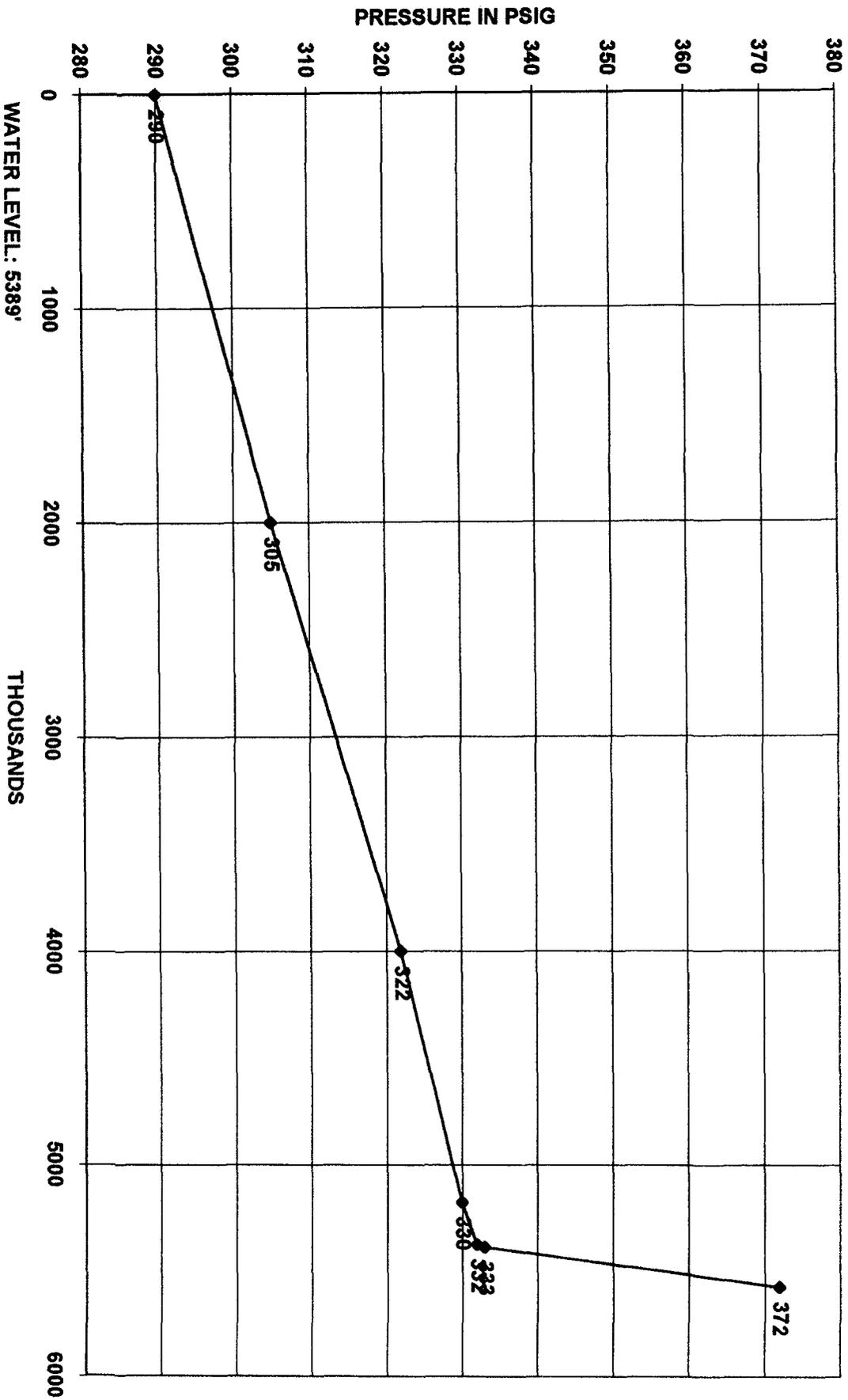
WELL STATUS: SHUT IN

DEPTH IN FEET	PRESSURE PSIG	GRADIENT PSI/FOOT
0	290	
2000	305	0.008
4000	322	0.009
5176	330	0.007
5376	332	0.010
5576	372	0.200

SLM @ 5579'

H & H WIRELINE SERVICE INC.
P. O. BOX 899
FLORA VISTA, NEW MEXICO 87415
OPERATOR: CHARLES HUGHES
UNIT NO. T-11

PHILLIPS PETROLEUM SAN JUAN 29-6 # 53
DATE: NOVEMBER 23, 1999



MEP81-01

PARPI - WELLZONE PRODUCTION BROWSE

Date: 1/11/00

MONTHLY TOTALS

User: MWSTODO

Wellzone F0280 01 Yr: 1999 Mth: 01 Property: 650112 SAN JUAN 29-6 MESA VERDE
 Screen: 1 (1-Prod, 2-Inj, 3-Both) Well No: 000053
 Type: T (T-Total, D-Daily Avg) Field: 070724 BLANCO
 Period: M (M-Mnthly, Y-Yrly, C-Cum) Resvr: 20002 MESAVERDE

ADJ	PRODUCED			DAYS		WELL	
FLG DATE	OIL (BBL)	GAS (MCF)	WATER (BBL)	PROD	OP	ST	CL TY
* 1999-01	2.92	5,061	7	31.00	31	11	03 2
1999-02	0.73	5,098	0	28.00	28	11	03 2
1999-03	19.64	5,840	0	31.00	31	11	03 2
1999-04	0.00	4,761	0	30.00	30	11	03 2
1999-05	6.53	5,567	0	31.00	31	11	03 2
1999-06	0.00	5,380	0	30.00	30	11	03 2
1999-07	0.00	5,522	0	31.00	31	11	03 2
1999-08	0.00	5,382	0	31.00	31	11	03 2
* 1999-09	0.00	5,404	0	30.00	30	11	03 2
* 1999-10	0.00	5,048	0	31.00	31	11	03 2
* 1999-11	17.41	3,650	0	30.00	30	11	03 2

NO MORE DATA AVAILABLE

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 Transfer-> PF7=Backward PF8=Forward PF4=PREV SCREEN PF12=LOG GRAPH

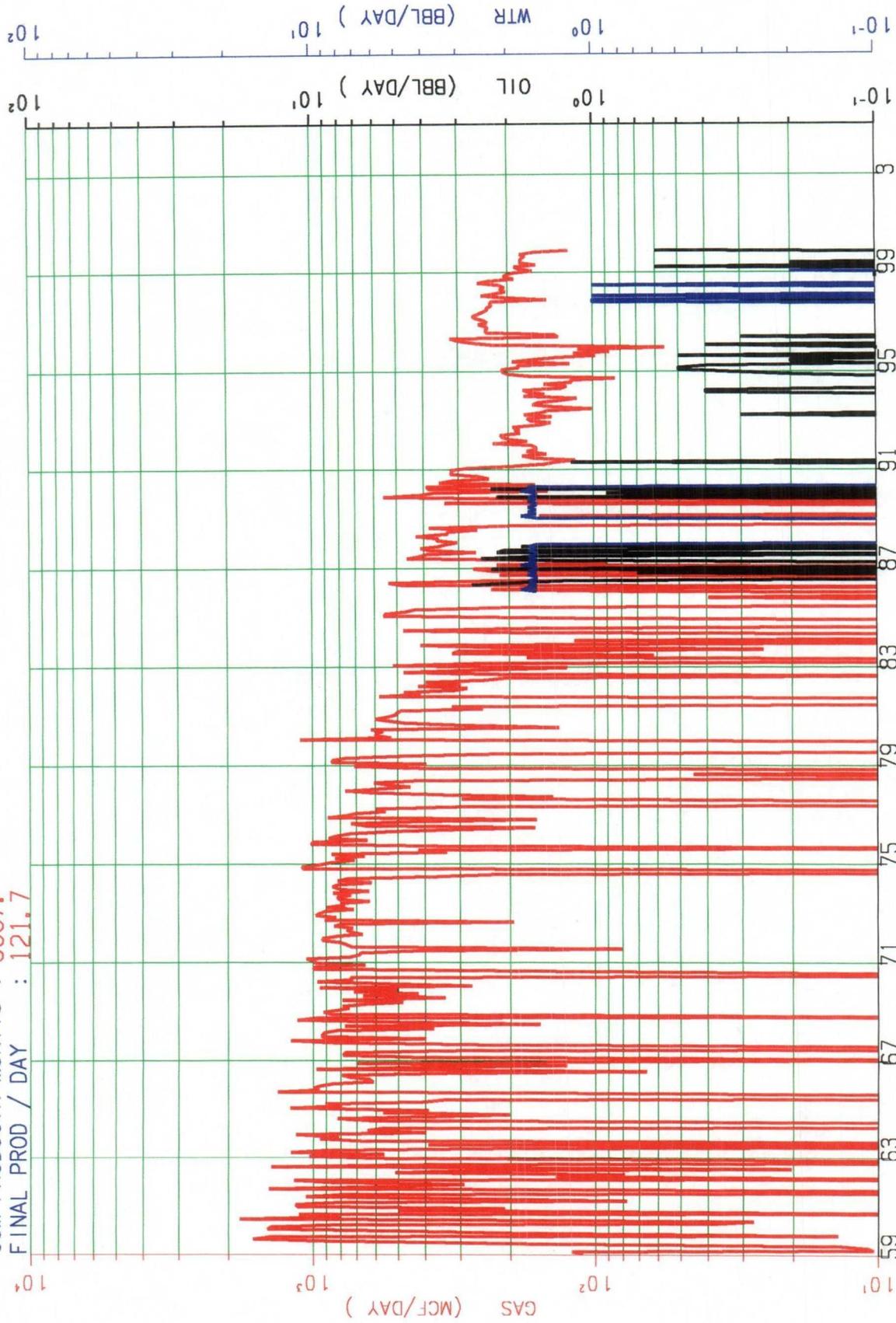
1/59-11/99

INITIAL PROD / DAY : 111.1
REMAINING LIFE : 40.92
CUM PRODUCTN-MUNITS : 5967.
FINAL PROD / DAY : 121.7

ASSOC.

Current Cums

5967. MMCF GAS
1075. BBL OIL
2134. BBL WTR



LEASE- 650112 : SAN JUAN 29-6 MESA VERDE
RESVR- 002 : BLANCO MESAVERDE
WELL - 000053 CUM MMCF= 6166.

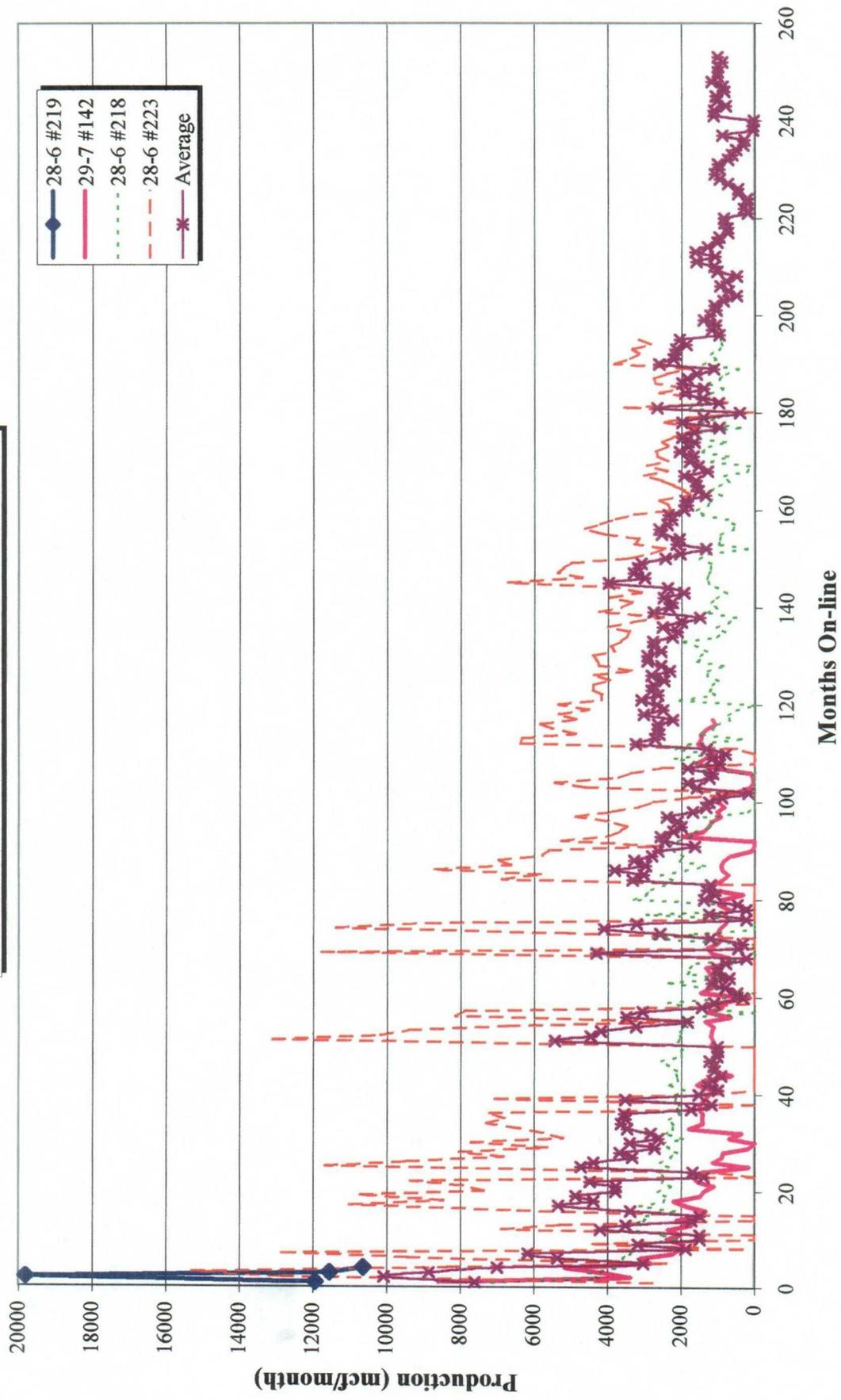
F028001
ZONE-650112002000053 F028001
API-30039075090000 THRU 99/11

San Juan 29-6 #53 Pictured Cliffs Forecast

<i>Initial Production Rate</i>	=	275	MCFD
<i>Hyperbolic Exponent</i>	=	0.33	
<i>Decline Rate</i>	=	27.360	%

Month	Days	Cum. Days	Initial q MCFD	Final q MCFD	Average q MCFD	Cum. MCF	<i>Monthly MCF</i>
Dec-99	31	31	275	269	272	8,427	8,427
Jan-00	31	62	269	263	266	16,662	8,235
Feb-00	28	90	263	257	260	23,939	7,278
Mar-00	31	121	257	251	254	31,824	7,885
Apr-00	30	151	251	246	249	39,288	7,463
May-00	31	182	246	241	243	46,831	7,544
Jun-00	30	212	241	235	238	54,072	7,241
Jul-00	31	243	235	230	233	61,292	7,220
Aug-00	31	274	230	225	228	68,355	7,063
Sep-00	30	305	225	221	223	75,138	6,783
Oct-00	31	336	221	216	218	81,904	6,766
Nov-00	30	366	216	212	214	88,403	6,499
Dec-00	31	397	212	207	209	94,889	6,486
Jan-01	31	428	207	203	205	101,239	6,350
Feb-01	28	456	203	199	201	106,860	5,622
Mar-01	31	487	199	195	197	112,962	6,102
Apr-01	30	518	195	191	193	118,827	5,865
May-01	31	549	191	187	189	124,684	5,857

Pictured Cliffs Production
(Area near SW corner of San Juan 29-6 Unit)



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 = $(\text{Commingled rate} - \text{Lower zone rate}) / \text{Commingled rate}$