

DATE IN 4/18/00	SUSPENSE 5/8/00	ENGINEER DC	LOGGED KN	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

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

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] and [C]

[B] Commingling - Storage - Measurement

X 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] X 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 - 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 Cole

Print or Type Name

Signature

Regulatory/Compliance Administrator

Title

Date

DISTRICT I

1625 N. French Dr., Hobbs, NM 88240

DISTRICT II

811 South First St., Artesia, NM 88210

DISTRICT III

1000 Rio Brazos Rd, Aztec, NM 87410

DISTRICT IV

2040 S. Pacheco, 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

APPLICATION FOR DOWNHOLE COMMINGLING

Form C-107-A
Revised March 17, 1999

APPROVAL PROCESS:

☒ Administrative ☐ Hearing

EXISTING WELLBORE

☒ YES ☐ NO

BURLINGTON RESOURCES OIL & GAS COMPANY

PO Box 4289, Farmington, NM 87499

Operator

Address

San Juan 27-5 Unit

#70

G, Sec. 8, T27N, R5W

Rio Arriba

Lease

Well No.

Unit Ltr. - Sec - Twp - Rge

County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7454 API NO. 30-039-07131 Federal X, 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 - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	5620'-5716'		7604'-7828'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure	a. 251 psia (Current)	a.	a. 581 psia
Oil Zones - Artificial Lift: Gas & Oil - Flowing: All Gas Zones: Estimated Current Measured Current Estimated Or Measured Original	b. 1253 psia (Original)	b.	b. 2947 psia
6. Oil Gravity (EAPI) or Gas BTU Content	BTU 1210		BTU 1085
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	Date: Rates:	Date: Rates:	Date: 2/00 Rates: 13 mcf/d 0.0 bopd <i>See graph!</i>
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: 2/00 Rates: 77 mcf/d 0.0 bopd	Date: Rates:	Date: Rates:
* If Producing, give date and oil/gas/water rates of recent test (within 60 days)			
8. Fixed Percentage Allocation Formula - % for each zone (total of %'s to equal 100%)	Oil: <i>83</i> % Gas: <i>35</i> %	Oil: % Gas: %	Oil: <i>19</i> % Gas: <i>65</i> %

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 ☒ No11. 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 ☐ No13. 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 ☐ No15. 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.
- * 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 Jennifer Dobson TITLE Operations Engineer DATE 4/12/00TYPE OR PRINT NAME Jennifer Dobson TELEPHONE NO. (505) 326-9700

W MEXICO OIL CONSERVATION COMMISSION
Well Location and Acreage Dedication Plat

Section A.

Date **APRIL 24, 1962**

Operator **EL PASO NATURAL GAS COMPANY** Lease **SAN JUAN 27-5 UNIT SFO79391**
Well No. **70 (MD)** Unit Letter **G** Section **8** Township **27-N** Range **5-W** NMPM
Located **1650** Feet From **NORTH** Line, **1850** Feet From **EAST** Line
County **RIO ARriba** G. L. Elevation **6617** Dedicated Acreage **320 & 320** Acres
Name of Producing Formation **DAKOTA & MESA VERDE** Pool **Basin DAKOTA & BLANCO M.V.**

1. Is the Operator the only owner in the dedicated acreage outlined on the plat below?Yes _____ No _____

2. If the answer to question one is "No", have the interests of all the owners been consolidated by communization agreement or otherwise? Yes _____ No _____. If answer is "yes", Type of Consolidation.

Unit Agreement

3. If the answer to question two is "no", list all the owners and their respective interests below:

OwnerLand Description

Section B.

This is to certify that the information
in Section A above is true and complete
to the best of my knowledge and belief.

El Paso Natural Gas Company

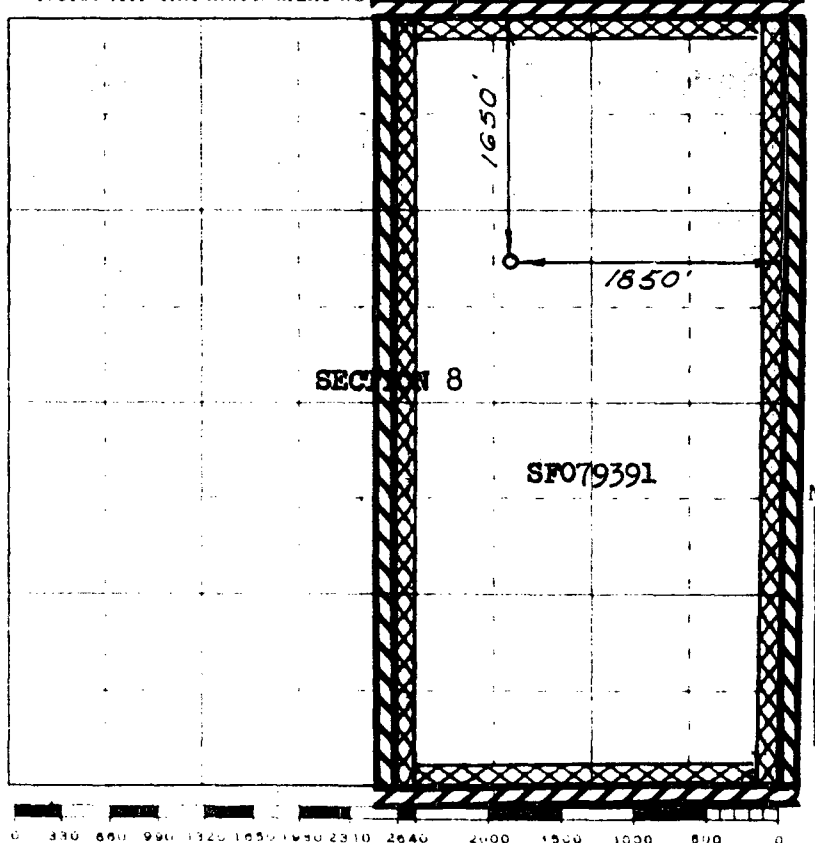
(Operator)
Original Signed **D. W. Meehan**

(Representative)
Box 990

(Address)
Farmington, New Mexico

This plat reissued to show
Mesa Verde Dakota dedication.

Note: All distances must be from outer boundaries of section.



Scale 4 inches equal 1 mile

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

(Seal)

Farmington, New Mexico

Date Surveyed

APRIL 23, 1962

David O. Kilmer
Registered Professional Engineer and/or Land Surveyor

SAN JUAN 27-5 UNIT 70 5340301 (32397198555.6268) Data: May. 1962-Feb. 2000

Cal Day Gas1 - mcf/d
Cum: 1983.71 MMSCF
Cal Day Condensate - Bbl/d
Cum: 0.24968 MSTB
Cond/Gas1 Ratio - Bbl/MMSCF

Cal Day Gas1 - mcf/d
Cal Day Condensate - Bbl/d
Cond/Gas1 Ratio - Bbl/MMSCF

Year

2012

2009

2006

2003

2000

1997

1994

1991

1988

1985

1982

1979

1976

1973

1970

Cal Day Gas1 - mcf/d
Cum: 1702.8 MMSCF
Cal Day Condensate - Bbl/d
Cum: 1.212 MSTB
Cond/Gas1 Ratio - Bbl/MMSCF

1E4

1000

Cal Day Gas1 - mcf/d

Cal Day Condensate - Bbl/d

Cond/Gas1 Ratio - Bbl/MMSCF

1000

100

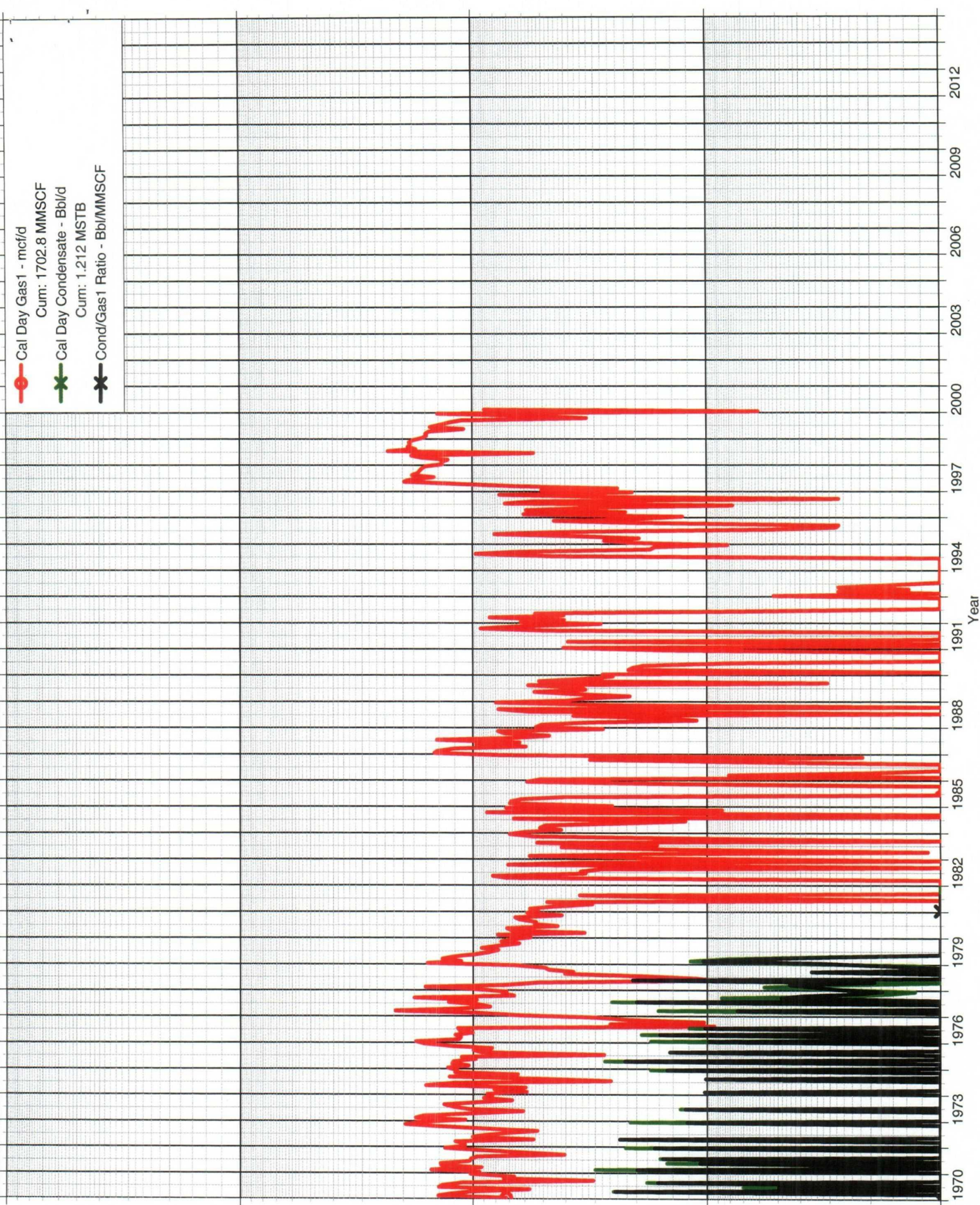
10

1

0.1

Year

1970 1973 1976 1979 1982 1985 1988 1991 1994 1997 2000 2003 2006 2009 2012



**San Juan 27-5 Unit #70
Production Allocation**

Gas

*Mesaverde Cumulative Production:	1,051 MMcf	35%
*Dakota Cumulative Production:	1,984 MMcf	65%
Total:	<u>3,034</u>	<u>100.0%</u>

Oil

*Mesaverde Cumulative Production:	1,212 BBls	83%
*Dakota Cumulative Production:	250 BBls	17%
Total:	<u>1,462</u>	

*Allocation Formula Basis: The fixed percentages are based on cumulative production from 7/62 - 2/00.

San Juan 27-5 Unit #70
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 GRAVITY	<u>0.694</u>	GAS GRAVITY	<u>0.642</u>
COND. OR MISC. (C/M)	<u>M</u>	COND. OR MISC. (C/M)	<u>M</u>
%N2	<u>0.22</u>	%N2	<u>0.13</u>
%CO2	<u>0.89</u>	%CO2	<u>1.35</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>5.5</u>	DIAMETER (IN)	<u>2.065</u>
DEPTH (FT)	<u>5668</u>	DEPTH (FT)	<u>6447</u>
SURFACE TEMPERATURE (DEG F)	<u>60</u>	SURFACE TEMPERATURE (DEG F)	<u>60</u>
BOTTOMHOLE TEMPERATURE (DEG F)	<u>150</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>175</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>219</u>	SURFACE PRESSURE (PSIA)	<u>503</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>250.9</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>581.3</u>
<u>MV-Original</u>		<u>DK-Original</u>	
GAS GRAVITY	<u>0.633</u>	GAS GRAVITY	<u>0.633</u>
COND. OR MISC. (C/M)	<u>M</u>	COND. OR MISC. (C/M)	<u>M</u>
%N2	<u>0.28</u>	%N2	<u>0.36</u>
%CO2	<u>1.32</u>	%CO2	<u>1.35</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>5.5</u>	DIAMETER (IN)	<u>2.065</u>
DEPTH (FT)	<u>5443</u>	DEPTH (FT)	<u>6447</u>
SURFACE TEMPERATURE (DEG F)	<u>60</u>	SURFACE TEMPERATURE (DEG F)	<u>60</u>
BOTTOMHOLE TEMPERATURE (DEG F)	<u>150</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>175</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>1096</u>	SURFACE PRESSURE (PSIA)	<u>2505</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>1252.5</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>2946.7</u>

Gas Meter Vol. History (Act.)

Friday, January 01, 1999 Through Sunday, April 30, 2000

Select By : Gas Meters

Pressure Base : 15.025

Page No : 1

Sort By :

Units :

Report Number : R_040

Sort By :

Rounded (yn) : No

Print Date : 04/06/2000, 8:36:47 PM

Meter	Volume Date	Ticket #	Volume	Heat Value	Period		Disp.	Prod.	Purchaser	Gatherer
					Start	End				
SAN JUAN 27-5 UNIT 70 73372	01/01/1999	6100000138	4,815.56	5,581.59	01/01/1999	01/31/1999	20	100		WILLIAMS FIELD SERV
	02/01/1999	2200000679	3,857.74	4,471.80	02/01/1999	02/28/1999	20	100		WILLIAMS FIELD SERV
	03/01/1999	0300003396	4,283.22	4,964.47	03/01/1999	03/31/1999	20	100		WILLIAMS FIELD SERV
	04/01/1999	8800001338	3,994.99	4,439.16	04/01/1999	04/30/1999	20	100		WILLIAMS FIELD SERV
	05/01/1999	7800000301	1,906.81	2,152.26	05/01/1999	05/31/1999	20	100		WILLIAMS FIELD SERV
	06/01/1999	7700000103	270.38	304.99	06/01/1999	06/30/1999	20	100		WILLIAMS FIELD SERV
	07/01/1999	7000005567	3,937.15	4,444.26	07/01/1999	07/31/1999	20	100		WILLIAMS FIELD SERV
	08/01/1999	9700000679	668.61	754.82	08/01/1999	08/31/1999	20	100		WILLIAMS FIELD SERV
	09/01/1999	0200000303	279.40	315.19	09/01/1999	09/30/1999	20	100		WILLIAMS FIELD SERV
	10/01/1999	7500003889	453.91	512.05	10/01/1999	10/31/1999	20	100		WILLIAMS FIELD SERV
	11/01/1999	4400003128	40.20	44.88	11/01/1999	11/30/1999	20	100		WILLIAMS FIELD SERV
	12/01/1999	4100000003	-291.17	-328.45	12/01/1999	12/31/1999	20	100		WILLIAMS FIELD SERV
	12/01/1999	5800000400	291.17	328.45	12/01/1999	12/31/1999	20	100		WILLIAMS FIELD SERV
	12/01/1999	4700002414	-291.17	-328.45	12/01/1999	12/31/1999	20	100		WILLIAMS FIELD SERV
	Totals -- 12/1999		-291.17	-328.45						
Totals -- 1999 SAN JUAN 27-5 UNIT 70 73372	Totals -- 1999		24,217.00	27,657.02	01/01/2000	01/31/2000	20	100		WILLIAMS FIELD SERV
	01/01/2000	7400000100	616.65	695.66	01/01/2000	01/31/2000	20	100		WILLIAMS FIELD SERV
	02/01/2000	7600000686	126.47	142.80	02/01/2000	02/29/2000	20	100		WILLIAMS FIELD SERV
	Totals -- 2000		743.12	838.46						
	Totals -- 73372		24,960.12	28,495.48						
SAN JUAN 27-5 UNIT 70 73373	01/01/1999	6100000139	4,994.97	6,268.07	01/01/1999	01/31/1999	20	100		WILLIAMS FIELD SERV
	02/01/1999	2200000678	4,339.10	5,444.90	02/01/1999	02/28/1999	20	100		WILLIAMS FIELD SERV
	03/01/1999	0300003385	4,854.77	6,091.60	03/01/1999	03/31/1999	20	100		WILLIAMS FIELD SERV
	04/01/1999	8800001337	4,535.17	5,690.73	04/01/1999	04/30/1999	20	100		WILLIAMS FIELD SERV
	05/01/1999	7800000286	3,299.91	4,140.29	05/01/1999	05/31/1999	20	100		WILLIAMS FIELD SERV
	06/01/1999	7700000102	4,476.35	5,617.29	06/01/1999	06/30/1999	20	100		WILLIAMS FIELD SERV
	07/01/1999	7000005568	4,220.48	5,295.98	07/01/1999	07/31/1999	20	100		WILLIAMS FIELD SERV
	08/01/1999	9700000680	3,817.55	4,790.05	08/01/1999	08/31/1999	20	100		WILLIAMS FIELD SERV
	09/01/1999	0200000302	3,343.05	4,194.35	09/01/1999	09/30/1999	20	100		WILLIAMS FIELD SERV
	10/01/1999	7500003888	917.62	1,151.61	10/01/1999	10/31/1999	20	100		WILLIAMS FIELD SERV
	11/01/1999	4400003129	1,484.27	1,862.57	11/01/1999	11/30/1999	20	100		WILLIAMS FIELD SERV
	12/01/1999	5800000399	4,297.92	5,402.06	12/01/1999	12/31/1999	20	100		WILLIAMS FIELD SERV
	Totals -- 1999		44,581.17	55,949.51						
	01/01/2000	7400000099	100.00	125.46	01/01/2000	01/31/2000	20	100		WILLIAMS FIELD SERV
	02/01/2000	7600000687	2,501.89	3,149.84	02/01/2000	02/29/2000	20	100		WILLIAMS FIELD SERV
	Totals -- 2000		2,601.89	3,275.31						
Totals -- 73373 SAN JUAN 27-5 UNIT 70	Totals -- 73373		47,183.06	59,224.82						
Report Totals			72,143.18	87,720.30						

San Juan 27-5 Unit #70
5340302/5340301
Mesaverde/Dakota

MESAVERDE

PRESSURE DATA		
Date	Gas Cum	Press
06/26/1962	0	1096
05/08/1998	959671	219

DAKOTA

PRESSURE DATA		
Date	Gas Cum	SIWHP
07/04/1962	0	2505
05/08/1998	1923074	503

**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.**

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,

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 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, etc., 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 commingle (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 Unit, 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:

- a) 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;

- 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 27-5 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 27-5 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 27-5 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 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 shut-in bottomhole 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 bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1,032 psi and 441 psi, 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 downhole commingled wells within the San Juan 27-5 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:

- a) the subtraction method will likely be utilized in those instances involving the Basin-Fruitland 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 utilized 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 downhole comminglings is unnecessary and is an excessive burden on the applicant;
- d) the downhole commingling of wells within the San Juan 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling 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 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 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 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, is hereby approved.

(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify the Pictured 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 Aztec Offices of the Division. Such application shall contain 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 commingling.

(4) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM H. LeMAY
Director

S E A L