BEFORE THE OIL CONSERVATION DIVISION EXAMINER HEARING JUNE 13, 2019

CASE No. 20537

SAN JUAN 28-6 UNIT 208 WELL

RIO ARRIBA COUNTY, NEW MEXICO



STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR

THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO.

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CASE NO. 20537

AFFIDAVIT OF CHARLES CREEKMORE IN SUPPORT OF CASE NO. 20537

I, Charles Creekmore, being of lawful age and duly sworn, declare as follows:

1. My name is Charles Creekmore. I work for Hilcorp Energy Company ("Hilcorp")

as a Landman.

2. I have previously testified before the New Mexico Oil Conservation Division as

an expert witness in petroleum land matters. My credentials as a petroleum landman have been

accepted by the Division and made a matter of record.

3. I am familiar with the application filed by Hilcorp in this case, and I am familiar

with the status of the lands in the subject areas.

4. None of the affected parties in this case has indicated opposition, and therefore I

do not expect any opposition at the hearing.

5. Hilcorp seeks an exception to the well density requirements of Rule I.B of the

Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to complete and

simultaneously produce three Mesaverde gas wells in the same quarter section for a total of five

Mesaverde gas wells within the same standard 320-acre, more or less, spacing and proration unit.

1

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico

Santa Fe, New Mexico

Exhibit No. A

- 6. The Blanco-Mesaverde Gas Pool is governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. The Special Rules therefore limit the number of wells in a spacing unit to four and the number of wells in a half section within a spacing unit to two. The Special Rules also provide that well density exceptions can be approved only after notice and hearing.
- 7. Hilcorp is the operator of a standard 320-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of the W/2 of Section 11, Township 27 North, Range 6 West, Rio Arriba County, New Mexico, in which the following four wells are currently completed and producing:
 - a. San Juan 28-6 Unit 79 Well (API No. 30-039-07110) Sec. 11, T27N, R6W (Unit M);
 - b. San Juan 28-6 Unit 158M Well (API No. 30-039-25778), Sec. 11, T27N, R6W (Unit C);
 - c. San Juan 28-6 Unit 158N Well (API No. 30-039-30547), Sec. 11, T27N, R6W (Unit D); and
 - d. San Juan 28-6 Unit 208P Well (API No. 30-039-30612), Sec. 11, T27N, R6W (Unit K).
- 8. Hilcorp now proposes to simultaneously dedicate and produce the following fifth well within the same standard spacing and proration unit, at the following location:
 - a. San Juan 28-6 Unit 208 Well (API No. 30-039-20838), Sec. 11, T27N, R6W
 (Unit L).
- 9. This will be the fifth well within the same spacing unit with three wells in the same quarter section, exceeding well density limits imposed by the Special Rules.

- 10. Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule 1.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the San Juan 28-6 Unit 208 Well (API No. 30-039-20838) within the W/2 of Section 11, Township 27 North, Range 6 West, permitting the total number of wells dedicated and producing within this spacing and proration unit to five, with three wells in the same quarter section.
- 11. The proposed simultaneous dedication of the **San Juan 28-6 Unit 208 Well**, which is currently producing in the Dakota formation, within the Blanco-Mesaverde is part of Hilcorp's strategy to use existing wells completed in other zones to economically target development of incremental Mesaverde gas reserves in areas where there is not adequate gas drainage.
- 12. The Division has pre-approved downhole commingling the Dakota formation with the Blanco-Mesaverde Gas Pool.
- 13. Pursuant to the Special Rules and Division precedent, Hilcorp provided notice to all Division-designated operators in offsetting 320-acre spacing units. Where Hilcorp is the operator, Hilcorp identified all working interest owners in offsetting spacing units as affected parties requiring notice. In some offsetting spacing units, Hilcorp may own 100% of the working interest, in which case there are no affected parties to notice.
- 14. **Exhibit A-1** is an overview map identifying the location of the subject Blanco-Mesaverde Gas Pool spacing unit, in the green outline, within the W/2 of Section 11, Township 27 North, Range 6 West, to which the well will be simultaneously dedicated.
- 15. Exhibit A-1 also identifies the locations of the existing Mesaverde wells as dark blue circles, as well as the **San Juan 28-6 Unit 208 Well** as a dark blue triangle.

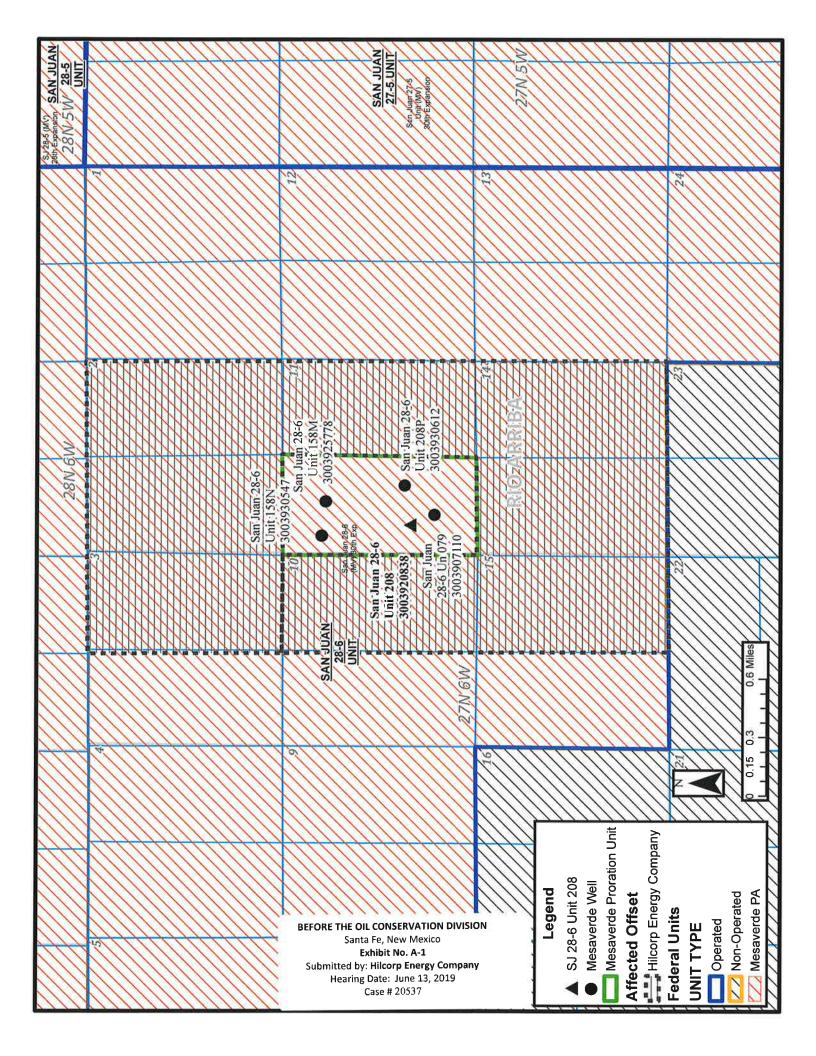
- 16. Exhibit A-1 also depicts the notice area comprised of the offsetting spacing units, which is the shaded area within the dark blue hashed line surrounding the subject spacing unit outlined in green. Hilcorp has provided notice of this application to the operators within the notice area. In some instances, Hilcorp may be the operator of offsetting spacing units within the notice area, in which case notice of the application was provided to all the working interest owners within the notice area.
- 17. **Exhibit A-2** identifies the affected parties within the offsetting spacing units who are required to be noticed. I provided a list of all affected parties requiring notice to Holland & Hart LLP. All parties were locatable.
- 18. To the best of my knowledge, the addresses used to provide notice are valid and correct addresses which have been recently used by Hilcorp and at which mail has been received by the notice parties.
 - 19. Exhibits A-1 and A-2 were prepared by me or under my direction and supervision.

 FURTHER AFFIANT SAYETH NAUGHT.

Charles Creekmore

STATE OF TEXAS)	
COUNTY OF Hing)	
SUBSCRIBED and SW	VORN to before	me this day of June, 2019 by
Charles Creekmore.		
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My Commission Expires:		
M-, 30, 2021.		CARSON PARKER RICE Notary ID #131148514 My Commission Expires May 30, 2021

12707348_v1



BA Name	Address	City	State	Zip Code	Remarks
1066712 BP AMERICA PRODUCTION COMPANY	PO BOX 848103	DALLAS	ĭ	75284-8103 WIO	MIO
1142889 CAROLYN BEAMON TILLEY	4 LAWRESTON PLACE	DALLAS	ĭ	75225	MIO
1146418 CB LIFELINE PARTNERSHIP	4 LAWRESTON PLACE	DALLAS	ĭ	75225	W.O
1139591 CHARLES W GAY	PO BOX 291445	KERRVILLE	ĭ	78029-1445	WIO
1139541 CLAUDIA MARCIA LUNDELL GILMER	723 W UNIVERSITY AVE STE 300-371	GEORGETOWN	Χ̈́	78626	WIO
1113652 CROSS TIMBERS ENERGY LLC	400 W 7TH STREET	FT WORTH	ĭ	76102	MIO
1149218 ENDURING RESOURCES IV LLC	1050 17TH STREET SUITE 2500	DENVER	8	80265	MIO
1139406 HARRINGTON ENERGY RESOURCES LP	1139406 HARRINGTON ENERGY RESOURCES LP A NM LP HARRINGTON SAN JUAN LLC GPPO BOX 219119	KANSAS CITY	Q	64121	MIO
1139407 HARRINGTON SOUTHWEST ENERGY LP	1139407 HARRINGTON SOUTHWEST ENERGY LP A NM LP HARRINGTON SAN JUAN LLC GPPO BOX 219119	KANSAS CITY	ΘM	64121	MO
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1139496 J&M RAYMOND LTD	RAYMOND & SONS I LLC GEN PARTNERPO BOX 291445	KERRVILLE	ĭ	78029-1445 WIO	MIO
1125552 JAMES R BEAMON	6140 HWY 6 SUITE 154	MISSOURI CITY	ΥT	77459	MIO
1139409 LINDA JEANNE LUNDELL LINDSEY	PO BOX 631565	NACOGDOCHES TX	ES TX	75963	WIO
1139481 LORRAYN GAY HACKER	PO BOX 291445	KERRVILLE	×	78029-1445 WIO	WIO
1138962 OMIMEX PETROLEUM	7950 JOHN T WHITE ROAD	FORT WORTH	ĭ	76120	WIO
1041017 PIONEER NATURAL RES USA INC	KATHY NAVARRETEP O BOX 3178	MIDLAND	ĭ	79702	NETPR
1147116 ROBERT E BEAMON III	C/O JAMES R BEAMON6140 HWY 6, SUITE 154	MISSOURI CITY	ΥT	77459	WIO
1126167 ROBERT WALTER LUNDELL	2450 FONDREN STE 304	HOUSTON	ĭ	77063-2318 WiO	Wio .
1126258 SHARON BEAMON BURNS	200 BISCAYNE BOULEVARD WAY APT 3411	MIAMI	긥	33131	WIO
1038523 SILVERADO OIL & GAS LLP	P O BOX 52308	TULSA	ð	74152-0308	NETPR
1126294 SUSAN BEAMON PORTER	319 KNIPP FOREST	HOUSTON	ĭ	77024-5030 WIO	WIO WIO
1139405 T H MCELVAIN OIL & GAS LLLP	511 16TH STREET SUITE 700	DENVER	္ပ	80202	WIO
1139415 TAMACAM LLC	JAMES M RAYMOND AFENT & AIFPO BOX 291445	KERRVILLE	ĭ	78029	WIO

ВА Name	Address	City	State		Remarks
1029948 PGC GAS COMPANY	8150 NORTH CENTRAL EXPWY SUITE 1475	DALLAS	ĭ	75206	WIO
1050132 FRANK N GIBBARD JR	14 PLUMER ROAD	EPPING	Ĭ	30420	W _O
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1139591 CHARLES W GAY	PO BOX 291445	KERRVILLE	ĭ	78029-1445	5 WIO
1139674 RKC INC	7500 E ARAPAHOE RD SUITE 7500	CENTENNIAL	8	80112	WIO
1140114 ELAINE G HOWE	PO BOX 624	SULPHUR	ð	73086-0624 VMO	t WIO
1144762 GRAYFORE PARTNERS LP	PO BOX 98670	LUBBOCK	¥	79499-8670 V/IO	O WIO
1144873 BETTY T JOHNSTON MARITAL TRUST	BETTY T JOHNSTON, TOM N AUNE, PATRICIA E AUNE, CO-TRUSTEES 17347 VILLAGE GREEN DR STE #101	HOUSTON	ĭ	77040	VIO
1144883 V A JOHNSTON LTD	PO BOX 303247	AUSTIN	ĭ	78703	VAO
1145055 VAUGHAN-MCELVAIN ENERGY INC	PO BOX 970	KENNETT SQUARE PA	RE PA	19348	VAO
1145213 RESOURCE DEVELOPMENT TECHNOLOGY LL(PO BOX 1020	LLC PO BOX 1020	MORRISON	8	80465	VAIO
1145662 BIG SNOWY EXPLORATION LLLP	C/O MCELVAIN ENERGY INC511 16TH STREET SUITE 700	DENVER	8	80202	VAO
1147124 EULA MAY JOHNSTON TRUST 661	BANK OF AMERICA N APO BOX 840738	DALLAS	ዾ	75284-0738	3 VAIO

STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NO. 20537

AFFIDAVIT

STATE OF NEW MEXICO)
) ss
COUNTY OF SANTA FE)

Adam G. Rankin, attorney in fact and authorized representative of Hilcorp Energy Company, the Applicant herein, being first duly sworn, upon oath, states that the above-referenced Application has been provided under the notice letters and proof of receipts attached hereto.

Adam O. Rankin

SUBSCRIBED AND SWORN to before me this 12th day of June, 2019 by Adam G. Rankin.

My Commission Expires:

Notary Public



Adam G. Rankin Phone (505) 988-4421 Fax (505) 983-6043 agrankin@hollandhart.com

May 24, 2019

<u>VIA CERTIFIED MAIL</u> CERTIFIED RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re: Application of Hilcorp Energy Company for an Exception to the Well Density

Requirements of the Special Rules and Regulations of the Blanco-Mesaverde

Gas Pool, Rio Arriba County, New Mexico.

Ladies & Gentlemen:

This letter is to advise you that Hilcorp Energy Company has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on June 13, 2019 and the status of the hearing can be monitored through the Division's website at http://www.emnrd.state.nm.us/ocd/. Division hearings will commence at 8:15 a.m. in Porter Hall at the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four business days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

If you have any questions about this matter, please contact Chuck Creekmore at (832) 839-4601.

Adam G. Rankin

ATTORNEY FOR HILCORP ENERGY COMPANY

Alaska

Colorado

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-1
Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019
Case # 20537



Shipment Confirmation Acceptance Notice

Note to Mailer: The labels and volume associated to this form online, must match the labeled packages being presented to the USPS® employee with this form.

Hilcorp Energy Co. 93904.0003 San Juan 28-6 Unit 208 Well Case No. 20537

Shipment Date: 05/24/2019

Shipped From:

Name: HOLLAND & HART LLP

Address: 110 N GUADALUPE ST # 1

City:_SANTA FE

State: NM ZIP+4® 87501

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^{*}Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

B. USPS Action

Note to RSS Clerk:

- 1. Home screen > Mailing/Shipping > More 2. Select Shipment Confirm
- Scan or enter the barcode/label number from PS Form 5630
 Confirm the volume count message by selecting Yes or No
 Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail. Leave form with customer or in customer's mail receptacle.

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STATE OF NEW MEXICO ENERGY, MINERALS RESOURCES DEPARTMENT OIL CONSERVATION DIVISION SANTA FE

NEW MEXICO
The State of New Mexico
through its Oil Conservation Division hereby gives notice pursuant to law and the Rules and Regu-lations of the Division of the following public hear-ing to be held at 8:15 A.M. on June 13, 2019, in the Oil Conservation Division Hearing Room at 1220 South St. Francis, Santa Fe, New Mexico, before an examiner duly appoint for the hearing. If you are an individual with a disability who is in need of a reader, amplifier, qualified sign language interpreter, or any other form of auxiliary aid or service to attend or parti-cipate in the hearing, please contact: Florene Davidson at 505-476-3458 or through the New Mexico Relay Network, 1-800-659-1779 by June 3, 2019. Public documents. including the agenda and minutes, can be provided in various accessible forms. Please contact Florene Davidson if a summary or other type of accessible form is needed

STATE OF NEW MEXICO TO: All named parties and persons having any right, title, interest or claim in the following case and notice to the

public. (NOTE: All land descriptions herein refer to the New Mexico Principal Meridian whether or not so stated.1

Pay TO: ALL WORKING IN-TEREST OWNERS IN THE SUBJECT SPA-CING UNIT AND OFF-SETTING OPERATORS Date OR LEASED MINERAL INTEREST OWNERS, IN-CLUDING: BP AMER-ICA PRODUCTION COMPANY; CAROLYN BEAMON TILLEY, HER HEIRS AND DEVISEES: CB LIFELINE PARTNER-SHIP; CHARLES W. GAY, HIS HEIRS AND DEVISEES; CLAUDIA MARCIA LUNDELL GILMER; HER HEIRS AND DEVISEES; CROSS TIMBERS ENERGY LLC; **CB LIFELINE PARTNER-**

ENDURING RE-SOURCES IV LLC; HAR-RINGTON ENERGY RE-SOURCES LP, A NM LP HARRINGTON SAN JUAN LLC GP; HAR-RINGTON SOUTHWEST ENERGY LP, A NM LP HARRINGTON SAN JUAN LLC GP; J&M RAYMOND LTD, RAY-MOND & SONS I LLC GEN PARTNER; JAMES R. BEAMON; HIS HEIRS AND DEVISEES; LINDA JEANNE LUNDELL LINDSEY, HER HEIRS AND DEVISEES; LOR-RAYN GAY HACKER, HER HEIRS AND DE-

VISEES; OMIMEX PET-ROLEUM: PIONEER NATURAL RES USA INC. C/O KATHY NAV-ARRETE; ROBERT E. BEAMON, III, HIS HEIRS AND DEVISEES (IO AND DEVISEES, C/O JAMES R. BEAMON: ROBERT WALTER LUN-DELL, HIS HEIRS AND DEVISEES; SHARON BEAMON BURNS, HER HEIRS AND DEVISEES;
SILVERADO OIL & GAS
SILVERADO OIL & GAS
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SILP; SUSAN BEAMON
PORTER, HER HEIRS
AND DEVISEES; T. H.,
MCELVAIN OIL & GAS
LLLP; TAMACAM LLC,
JAMES M. RAYMOND
AFENT & AIF; PGC GAS
COMPANY; FRANK N
GIBBARD, JR.; HIS
HEIRS AND DEVISEES;
RKC INC; ELAINE G,
HOWE, HER HEIRS AND
DEVISEES; GRAYFORE HEIRS AND DEVISEES HOWE, HER HEIRS AND DEVISEES: GRAYFORE PARTNERS LP; BETTY T. JOHNSTON MARITAL TRUST; V. A. JOHNSTON LTD; VAUGHANMELVAIN ENERGY INC; RESOURCE DEVELOPMENT TECHNOLOGY LLC; BIG SNOWY EXPLORATION LLLP. EULA MAY JOHNSTON TRUST 661.
CASE 20537: Applica-CASE 20537: Applica-tion of Hilcorp Energy Company for an Excep-tion to the Well Density Requirements of the Special Rules and Reg-ulations of the Blanco-Mesaverde Gas Pool, Mesaverde Gas Poor, Rio Arriba County, New Mexico. Applicant in the Mexico. Applicant in the above-styled cause seeks an order for an exception to the well density re-quirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (72319), Rio Arriba County, New Mexico, to permit it to complete and simultaneously produce five Mesavarde gas until five Mesaverde gas wells in the same standard 320acre, more or less, spacing and proration unit, with three wells in the same quarter section. Hilcorp further seeks approval for the proposed location of the San Juan 28-6 Unit 208 Well (API No. 30-039-20838) in the Mesaverde formation with a surface location in Unit L of the W/2 of Section 11, Township 27 North, 11, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, and authoriza-tion to simultaneously complete and produce the San Juan 28-6 Unit 208 Well from the Blanco-Mesaverde Gas Pool. Said area is located ap-

proximately 29 miles east of Bloomfield, NM.

(Published May 30, 2019)

Affidavit of Publication

State of New Mexico County of Rio Arriba

I, Robert Trapp, being first duly sworn, declare and say I am the publisher of the Rio Grande SUN, a weekly newspaper published in the English language and having a general circulation in the County of Rio Arriba, State of New Mexico, and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 of the Session Laws of 1937. The publication, a copy of which is hereto attached, was published in said paper once each week for

consecutive weeks and on the same day of each week in the regular issue of the paper during the time of publication and the notice was published in the newspaper proper, and not in any supplement. The first publication being on the May 2019 **∂**D day of and the last publication on the __30 __day of May, 2019 payment for said advertisement has been duly made, or assessed as court costs. The undersigned has personal knowledge of the matters and things set forth in this affidavit.

Palit hopp

Subscribed and sworn to before me this 30 day of May A.D. 2019

> Maria V. Lopez-Garcia/Notary Public My commission expires 13 July 2021



Santa Fe, New Mexico

STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NO. 20537

AFFIDAVIT OF MICHELLE SIVADON IN SUPPORT OF CASE NO. 20537

Michelle Sivadon, being of lawful age and duly sworn, declare as follows:

- 1. My name is Michelle Sivadon. I work for Hilcorp Energy Company ("Hilcorp") as a reservoir engineer.
- 2. I have previously testified before the New Mexico Oil Conservation Division as an expert in reservoir engineering. My credentials as a reservoir engineer have been accepted by the Division and made a matter of record.
- 3. I am familiar with the application filed by Hilcorp in this case and have conducted an engineering study of the subject area and of the Blanco-Mesaverde Gas Pool.
- 4. As with Hilcorp's prior applications for well density exceptions in the Blanco-Mesaverde Gas Pool, I used a decline curve analysis of existing wells to estimate ultimate recoveries for the subject spacing unit under the existing well density. I then compared the estimated ultimate gas recoveries against log-derived volumetric calculations for the original gas in place with the cumulative gas production in the spacing unit. Using this approach, we identified areas, including the subject spacing unit, that have substantial remaining recoverable

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. C
Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019

Case # 20537

gas and lower-than-expected gas recoveries where additional well bores or well completions are necessary to adequately drain remaining gas reserves.

- 5. **Exhibit C-1** contains information relating to the subject spacing unit and the **San Juan 28-6 Unit 208 Well** (API No. 30-039-20838) within the W/2 of Section 11, Township 27

 North, Range 6 West, which is the well Hilcorp proposes for simultaneous dedication within the Blanco-Mesaverde Gas Pool in this application. It is currently producing within the Dakota formation. It will be the third Mesaverde completion in the quarter section in the spacing unit. I anticipate that it will help drain the area to the north.
- 6. **Exhibit C-2** is a basin-wide map reflecting Hilcorp's calculations for original gas in place across the Blanco-Mesaverde Gas Pool. The warmer colors represent areas where there is more original gas in place. The cooler colors indicate areas where there is less original gas in place. The red star indicates the location of the subject well in an area where we calculate moderately high volumes of original gas in place.
- 7. **Exhibit C-3** is a map depicting the calculated estimated ultimate recovery (EUR) from the Blanco-Mesaverde Gas Pool and drainage radius. The larger radius circles reflect wells with higher EURs and larger drainage areas. The red star identifies the location of the subject well where there is relatively low EURs and the drainage radii are smaller.
- 8. **Exhibit C-4** is a map depicting calculated remaining recoverable gas. The cooler colors indicate areas where there is relatively less remaining recoverable gas. The warmer colors reflect areas where there is relatively more remaining recoverable gas. The red star identifies the location of the subject well in an area where we calculate that there is relatively considerable remaining recoverable gas and relatively low EURs under the existing well density.

- 9. **Exhibit C-5** is a table that supports this volumetric analysis. The first column titled "Volumetric OGIP" reflects the calculated volumetric original gas in place on a quarter section, section, and nine-section area basis around the subject spacing unit. The column titled "Section Equivalent OGIP" shows the estimated gas in place to show that the estimates are consistent across the area. The column titled "CTD/RF%" shows the cumulative gas production to date on a quarter section, section, and nine-section area basis and the calculated recovery factor. The column titled "Remaining GIP" shows the estimated remaining gas in place on a quarter section, section, and nine-section area basis. The last column titled "EUR/RF%" shows the estimated ultimate gas recovery and recovery factor calculated on a quarter section, section, and nine-section area basis.
- 10. I would expect recovery factors of approximately 70-80% in a gas pool of this type. The relatively low recovery factors in Exhibit C-5 indicate that this area is not being sufficiently drained by the existing wells in the subject spacing unit under the existing well density and that additional well bores, or completions, are necessary to adequately drain the Blanco-Mesaverde Gas Pool in this area.
- 11. Approval of Hilcorp's application is therefore necessary to drain unrecovered gas reserves that will otherwise be left in place under the existing well density.
- 12. **Exhibit C-6** is a well bore diagram for the subject well. It provides the most current information known regarding the status and construction of the well, as well as the location and condition of cement within the wellbore. Hilcorp will separately seek administrative approval from the Division's Aztec District Office for authorization to recomplete this well in advance of undertaking any recompletion operations.

- 13. In my opinion, granting this application will not impair the Blanco-Mesaverde Gas Pool, and will be in the interest of conservation, the prevention of waste and will protect correlative rights.
- 14. Exhibits C-1 through C-6 were prepared by me or under my direction and supervision.

FURTHER AFFIANT SAYETH NAUGHT.

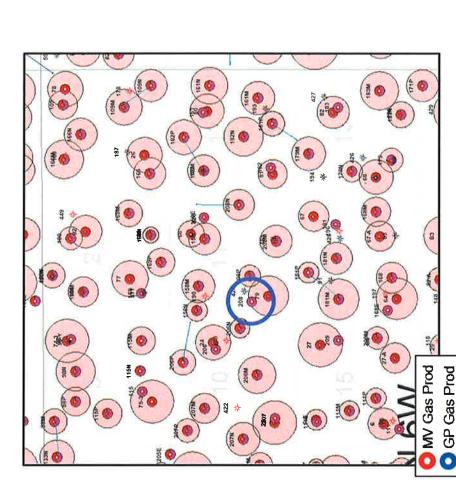
Michelle Sivadon

STATE OF TEXAS) COUNTY OF	
SUBSCRIBED and SWORN	to before me this day of June, 2019 by
Michelle Sivadon.	NOTARY PUBLIC
My Commission Expires: May 30, 2021.	CARSON PARKER RICE Notary ID #131148514 My Commission Expires May 30, 2021

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San Juan 28-6 Unit 208





Well Specifics

- SW11 27-6 3003920838 1974 drill
- 3rd MV completion in 1/4 section
- 730' from nearest MV producer
 - Help drain area to the north

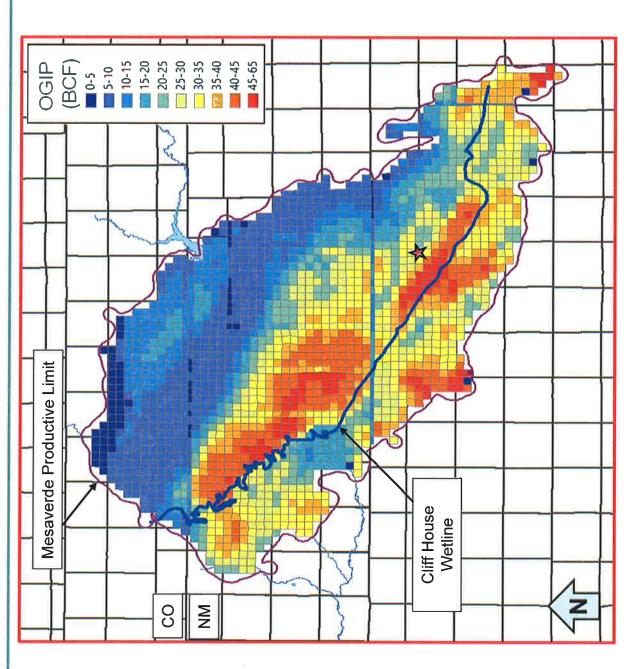
Complete MV in 1-2 stages

DK Gas Prod

Submitted by: Hilcorp Energy Company Hearing Date: June 13, 2019 Case # 20537

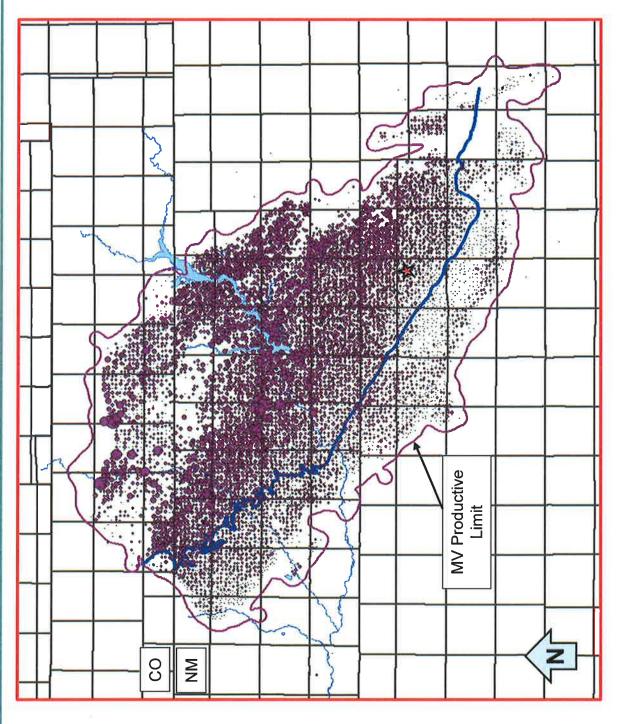


MV Original Gas In Place



MV EUR and Drainage Radius





BEFORE THE OIL CONSERVATION DIVISION

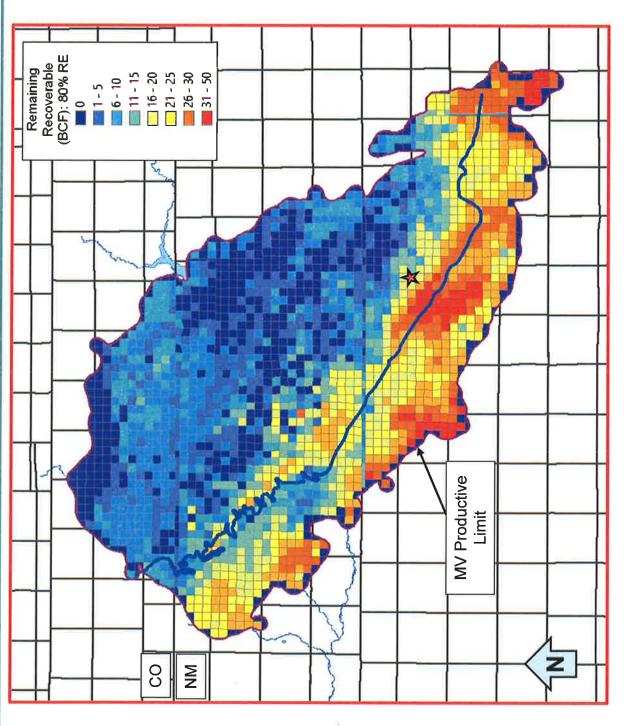
Santa Fe, New Mexico
Exhibit No. C-3

Submitted by: Hilcorp Energy Company Hearing Date: June 13, 2019

Case # 20537

MV Remaining Recoverable Gas





Santa Fe, New Mexico
Exhibit No. C-4
Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019
Case # 20537



San Juan 28-6 Unit 208

Reference Area	Volumetric OGIP	Section Equivalent OGIP	CTD/RF%	Remaining GIP	EUR / RF%
Qtr Section	8.0 Bcf	32.0 Bcf	1.9 Bcf / 23%	6.1 Bcf	2.7 Bcf / 34%
	29.5 Bcf	29.5 Bcf	5.5 Bcf / 19%	24.0 Bcf	8.9 Bcf / 30%
9 Section	311.0 Bcf	34.6 Bcf	60.0 Bcf / 19%	251.0 Bcf	90.0 Bcf / 29%

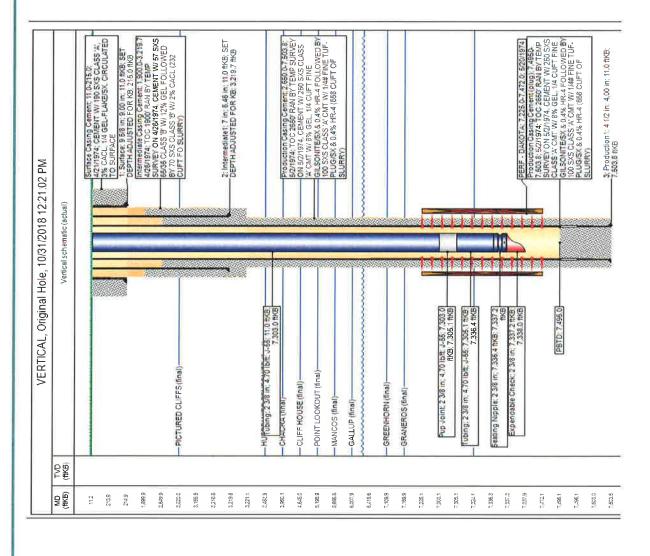
Remaining Gas in Place in Quarter Section of 6.1 Bcf

Cumulative Recovery Factor to Date 23% and 19% in the Quarter Section and Section, respectively

Considerable gas remaining in area with opportunity to recover additional volumes utilizing existing wellbore



San Juan 28-6 Unit 208 - Schematic



Santa Fe, New Mexico
Exhibit No. C-6

Submitted by: Hilcorp Energy Company Hearing Date: June 13, 2019

Case # 20537