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August 23, 1994

▲  
AUG 1994  
RECEIVED  
Land Dept.

**HAND DELIVERED**

Mr. Michael E. Stogner  
Chief Hearing Examiner  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

AUG 23 1994

Re: Harmon A Well No. 2, F-02-27N-12W  
Application of Meridian Oil Inc.  
for downhole commingling and an  
unorthodox coal-gas well location,  
San Juan County, New Mexico

Dear Mr. Stogner:

On behalf of Meridian Oil Inc., please find enclosed our referenced application which we request be set for hearing on the next available Examiner's docket now scheduled for September 15, 1994.

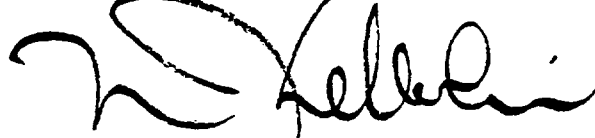
By copy of this letter and application, sent certified mail, we are notifying all interested parties of their right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the application and that failure to appear at the hearing may preclude them from any involvement in this case at a later date.

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Pursuant to the Division's Memorandum 2-90, all parties are hereby informed that if they appear in this case, then they are requested to file a Pre-Hearing Statement with the Division not later than 4:00 PM on Friday, September 9, 1994, with a copy delivered to the undersigned.

Also enclosed is our proposed advertisement of this case for the NMOCD docket.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written over a horizontal line.

W. Thomas Kellahin

WTK/wtk  
Enclosure

cc: Meridian Oil Inc. and  
**By Certified Mail - Return Receipt**  
All Interested Parties

ME 23 1004

### PROPOSED ADVERTISEMENT

Case \_\_\_\_\_: Application of Meridian Oil Inc. for downhole commingling and an unorthodox coal gas well location, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks approval to downhole commingle Fulcher Kutz-Pictured Cliffs Gas Pool (NW/4 dedication) with the Basin-Fruitland Coal Gas Pool production (N/2 dedication) within the wellbore of its Harmon A Well No. 2 located 1650 feet from the North line and 1650 feet from the West line (Unit F) of Section 2, T27N, R12W, NMPM, at an unorthodox "off-pattern" coal-gas well location. Said well is located approximately 10.5 miles southeast from Farmington, New Mexico.

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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:

APPLICATION OF MERIDIAN OIL INC.  
FOR DOWNHOLE COMMINGLING AND AN  
UNORTHODOX COAL-GAS WELL LOCATION,  
SAN JUAN COUNTY, NEW MEXICO.

CASE:

APPLICATION

Comes now MERIDIAN OIL INC., ("Meridian") by and through its attorneys, Kellahin and Kellahin, and applies to the New Mexico Oil Conservation Division for approval to downhole commingle Fulcher Kutz-Pictured Cliffs Gas Pool (NW/4 dedication) with the Basin-Fruitland Coal Gas Pool production (N/2 dedication) within the wellbore of its Harmon A Well No. 2 located 1650 feet from the North line and 1650 feet from the West line (Unit F) of Section 2, T27N, R12W, NMPM and for an unorthodox coal gas "off-pattern" well location.

In support of its application, Meridian states:

(1) Meridian is the operator of the Harmon A Well No. 2 in Section 2, T27N, R12W, NMPM, San Juan County, New Mexico which currently is a single completion well in the Fulcher Kutz-Pictured Cliffs Gas Pool. See Exhibit "A" attached.

(3) In addition, Meridian has selected to recomplete its Harmon A Well No. 2 at an unorthodox "off pattern" coal gas well location in order to downhole commingle that production with the Pictured Cliffs production in order to recover marginal Pictured Cliffs gas reserves located in the NW/4 of Section 2.

(4) The ownership is not common for the well and its respective spacing and proration units in both pools.

(5) In accordance with Division Rule 303-C-1.(b), the Applicant states and will demonstrate at hearing:

1. the downhole commingling in this wellbore is necessary because evidence indicates that the Pictured Cliffs formation in this area of the San Juan Basin should be marginally productive and that due to the marginal production expected, it is uneconomic to drill a stand alone Pictured Cliffs Well. In addition, it is not economic to attempt to dually complete those formations in this well;

2. there will be no crossflow between the two zones commingled;

3. neither commingled zones exposes the other to damage by produced liquids;

4. the fluids from each zone are compatible with the other;

5. it is expected that the bottom hole pressure of the lower pressure zone is not less than 50 percent of the bottom hole pressure of the higher pressure zone adjusted to a common datum.

6. the value of the commingled production will not be less than the sum of the values of the individual production.

(6) The proposed downhole commingling is necessary in order for the applicant to economically recover Basin-Fruitland Coal Gas and Pictured Cliffs Gas Pool reserves underlying each respective proration unit.

(7) Due to the nature of the Basin-Fruitland Coal Gas production, straight allocation of gas volumes from both zones is not appropriate. Meridian therefore seeks the adoption of a monthly allocation formula to be presented at the time of the hearing.

(8) Applicant requests that this matter be docketed for hearing on the Division's Examiner docket now scheduled for September 15, 1994.

(9) A copy of this application is being sent to all owners of production within the respective spacing unit for the well who may be affected by downhole commingling.

(10) Copy of this application has been sent to all offsetting operators to the two spacing units for the well.

WHEREFORE Applicant requests that this matter be set for hearing on September 15, 1994 before a duly appointed Examiner of the Oil Conservation Division and that after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted



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