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*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

W. THOMAS KELLAHIN*

September 19, 1994

HAND DELIVERED

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

Re: Schumacher Well No. 3, N-18-30N-10W Application of Meridian Oil Inc. for downhole commingling, 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 October 13, 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



Oil Conservation Division September 19, 1994 Page Two

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, October 7, 1994, with a copy delivered to the undersigned.

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

Very truly yours,

W. Thomas Kellahin

WTK/wtk Enclosure

cc: Meridian Oil Inc. and

By Certified Mail - Return Receipt

All Interested Parties

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, 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 Aztec-Pictured Cliffs Gas Pool (SW/4 dedication) with the Basin-Fruitland Coal Gas Pool production (S/2 dedication) within the wellbore of its Schumacher Well No. 3 located 990 feet from the South line and 1650 feet from the West line (Unit N) of Section 18, T30N, R10W, NMPM;

In support of its application, Meridian states:

- (1) Meridian is the operator of the Schumacher Well No. 3 in Section 18, T30N, R10W, NMPM, San Juan County, New Mexico which currently is a single completion well in the Aztec-Pictured Cliffs Gas Pool. See Exhibit "A" attached.
- (2) The well is to be recompleted so that production from the Basin-Fruitland Coal Gas Pool and the Pictured Cliffs formation can be downhole commingled in the wellbore.

- (3) The ownership is not common for the well and its respective spacing and proration units in both pools.
- (4) In accordance with Division Rule 303-C-l.(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 production from this well in this well is now marginally productive and any remaining Pictured Cliffs production will have to be abandoned unless it is downhole commingled with Basin Fruitland Coal Gas production. 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.
- (5) 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.

Application of Meridian Oil, Inc. Page 3

- (6) 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.
- (7) Applicant requests that this matter be docketed for hearing on the Division's Examiner docket now scheduled for October 13, 1994.
- (8) A copy of this application is being sent to all owners of production within each of the respective spacing units for the well who may be affected by downhole commingling.
- (9) Copy of this application has been sent to all offsetting operators to the two spacing units for the well as shown on Exhibits "B" and "C".

WHEREFORE Applicant requests that this matter be set for hearing on October 13, 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.

W. Thomas Kellahin

Respectfully submitted

KELLAHIN and KELLAHIN

P. O. Box 2265

Santa Fe, New Mexico 87501

(505) 982-4285

Attorneys for Applicant

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SCHUMACHER #.

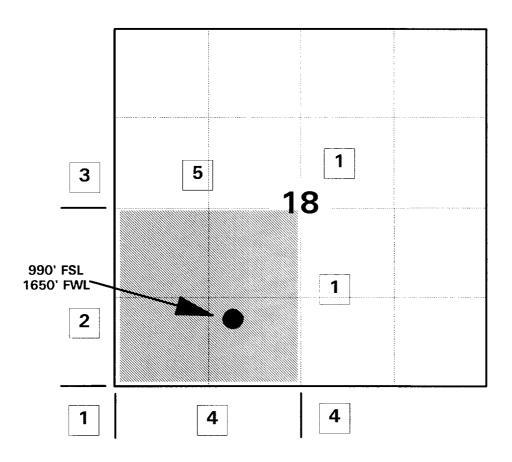
MERIDIAN OIL INC

SCHUMACHER #3

OFFSET OPERATOR \ OWNER PLAT

Pictured Cliffs / Fruitland Coal Formation Commigle

Township 30 North, Range 10 West



1)	Meridian Oil Inc					
2)	Southland Royalty Company					
3)	Meridian Oil Inc & Southland Royalty Comp	any				
4)	Amoco Production Company	PO Box 800, Denver, CO 8020				
5)	Dugan Production Corporation	PO Box 420, Farmington, NM 87499				
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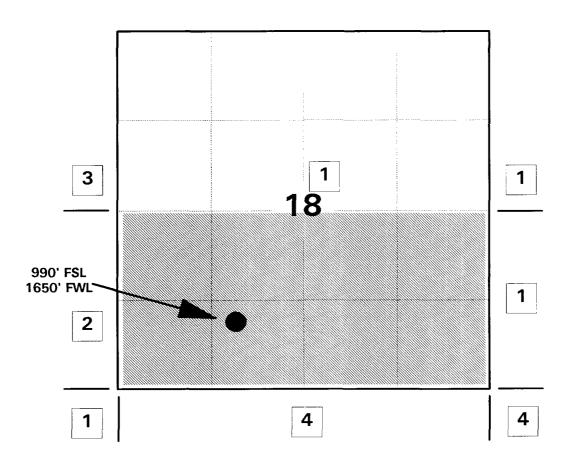
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