

PRODUCTION ALLOCATION METHODOLOGY

New Drill Wells & Recompletions

Initially Subtraction Method followed by Fixed Allocation (Ratio) Method

Subtraction Method (Six to Twelve Months)

- Determine stabilized flow rate for existing zone (for recompletion – decline curve) or lower zone (for new drill – initial stabilized rate) and forecast production rate by month
- Subtract forecasted rate from commingled rate to determine production rate on new commingled zone
- Utilize subtraction method for six to twelve months until new zone rate stabilizes, then utilize fixed allocation method with current rates

Fixed Allocation Method (after Subtraction Method)

- Utilize forecasted rate for existing or lower zone
- Calculate upper zone rate by subtracting existing or lower zone rate from commingled rate
- Lower zone allocation = $\frac{\text{Lower zone rate}}{\text{Commingled rate}}$
- Upper zone allocation = $(\text{Commingled rate} - \text{Lower zone rate}) / \text{Commingled rate}$
- Example: Lower or existing zone rate - 400 MCFD (forecast after 6 to 12 months)
Commingled rate - 1000 MCFD

Lower zone allocation = $400 / 1000$
= 40%

Upper zone allocation = $(1000 - 400) / 1000$
= 60%

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MAR 16 1999

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Via Fax and U.S. Mail

Lori Wrotenbery
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico

Dear Ms. Wrotenbery:

Enclosed for filing are an original and three copies of an Entry of Appearance in cases 12136-12139 (Applications of Phillips Petroleum Company).

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jim Bruce", is written over a horizontal line.

James Bruce

Attorney for Larry Simmons