CASE 5602: CONSOLIDATED OIL & GAS, INC. FOR DOWNHOLE COMMING-LING, SAN JUAN COUNTY, NEW MEXICO

CASE NO.

5602

APPlication,
Transcripts,
Small Exhibits,

ETC.

R. L. STAMETS

Order for Cose

5602 show to

have cover letter

saying "Contact

Patec OCC to

inform then of

date and time

operations to complete

to start"



DIRECTOR

JOE D. RAMEY

OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO
P. O. BOX 2088 - SANTA FE
87501

LAND COMMISSIONER PHIL R. LUCERO

Re:



STATE GEOLOGIST EMERY C. ARNOLD

Mr. Tom Kellahin	
Kellahin & Fox	
Attorneys at Law	
Post Office Box 1769	
Santa Fe. New Mexico	

CASE NO. 5602
ORDER NO. R-5146

Applicant:

Consolidated Oil & Gas, Inc.

Dear Sir:

Enclosed herewith are two copies of the above-referenced Commission order recently entered in the subject case.

Yours very truly,

JOE D. RAMEY

Director

JDR/fd

Copy of order also sent to:

Hobbs OCC X
Artesia OCC X
Aztec OCC X

Other____

BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION Santa Fe, New Mexico January 7, 1976 EXAMINER HEARING IN THE MATTER OF: Application of Consolidated Oil & Gas, CASE Inc. for donwhole commingling, 5602 San Juan County, New Mexico. BEFORE: Richard L. Stamets, Examiner 10 11 TRANSCRIPT OF HEARING 12 13 APPEARANCES For the New Mexico Oil William F. Carr, Esq. 14 Conservation Commission: Legal Counsel for the Commission State Land Office Building 15 Santa Fe, New Mexico 16 For the Applicant: W. Thomas Kellahin, Esq. KELLAHIN & FOX 17 Attorneys at Law 500 Don Gaspai 18 Santa Fe, New Mexico 19 20

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MR. STAMETS: We will call the next Case, 5602.

MR. CARR: Case 5602, application of Consolidated Oil & Gas, Inc. for downhole commingling, San Juan County, New Mexico.

MR. KELLAHIN: If the Examiner please, I'm Tom

Kellahin of Kellahin and Fox appearing on behalf of Consolidated

Oil, I have the same witness and I would like the record to

reflect that he was previously sworn and qualified.

MR. STAMETS: The record will so show.

FLOYD E. ELLISON, JR.

called as a witness, having been previously sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Mr. Ellison, would you please refer to Exhibit
Number One and explain to the Examiner what Consolidated Oil
& Gas is seeking?

A. Exhibit Number One is a plat of the area surrounding the Collins 1-31, the Walz 1-31, Manley 1-31 operated by Consolidated Oil & Gas in Section 31, Township 29 North, Range 10 West and Consolidated is requesting permission to commingle production from the Pictured Cliffs and Fruitland formations if we do decide to recomplete in these wells. The problem being that we do have a size of casing that creates

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mechanical	problems	if	we	would	try	to	do	it.

- Q Would you begin by identifying the offset ownership, starting with the southwest quarter of Section 32?
 - A. The southwest quarter of Section 32 is Texaco.
 - Q The north half of Section 8?
- A. Consolidated Oil & Gas has the eastern half, El Paso has the western half.
 - Q. And the south half of Section 7?
 - A. Amoco.
 - Q Okay, and the east half of Section 36?
- A I'm sorry, for some reason I failed to find out whose that was. I'm not sure if it's Aztec or who it might be.
- Q. All right. How about the south half of Section 30? Who owns that?
- A. It's Amoco and it shows Amoco and Cates is who had it from the PI cards.
 - Q. The northeast quarter of Section 31?
 - A. Southern Union.
- Q All right, you continue then with Exhibit Number
 Two and identify it?
- A. Exhibit Two is a letter to the USGS requesting permission to commingle these three wells as set forth as far as the reasons that we felt that commingling was appropriate.

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24 25 Q. Exhibit Number Three?

A. Exhibit Number Three is a letter from the USGS giving approval to commingle the three wells, subject to the approval of the Oil Conservation Commission.

- Q Exhibit Number Four?
- A. Exhibit Number Four, of course, is the Form 9331 from the UsGS showing its stamped approval of our request and that is on the Collins well.
 - Q And Exhibit Number Five?
- A. Number Five is the same form approval of the Manley well.
 - Q. Exhibit Number Six?
 - A. The same form approval of the Walz well.
 - Q Exhibit Number Seven?
- A. Exhibit Number Seven is a similar type -- well, it's a plot of our bottom-hole pressure corrected for compressibility versus cumulative gas and it is on the Collins 1-31 Pictured Cliffs zone and from it you can see that the projected ultimate reserves for the Collins well is seven hundred and eighty-five thousand MCF and this particular one was drawn through the last point because from the appearance of our pressure data it appears that -- and I think maybe this can be substantiated by some problems that we had.

 Apparently the points of the last three or four years prior to that had dropped down and apparently were being affected by

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some water or fluids in the wellbore.

- Exhibit Number Eight?
- Exhibit Number Eight is a similar type plot projecting seven hundred and fifteen thousand MCF ultimate reserves from the Manley well and again we have, but not to the same degree of the last three or four years, the points had been slightly below the projected line there. We believe it is from the same reason.
- Your line intersects a point at five hundred and it doesn't intersect some of these other points. Why do you feel that this last point through which you drew your line, why do you feel that to be reliable?
- Normally in this type of plot you normally try to take it through the initial point, although this is not always the case. You do try to find the best fit as far as for your points and in this particular case it looks like probably the best point is through the initial point. Sometimes it is affected by how long the well is shut in and how tight the reservoir is and many other things, so it is not always drawn through that and in these cases it looked like it was as good a fit as we might get.
 - Exhibit Number Nine?
- Exhibit Number Nine is a similar type of plot for the Walz 1-31 well and again we did draw through that particular one. It looked like as good a point as any to draw through.

Q. Exhibit Number Ten?

A. Exhibit Number Ten is a table showing the cumulative production for all three wells through November 30th. It shows the average daily production over the first eleven months of this year. It shows the ultimate recovery projected from these curves and it shows the estimated cumulative production to the end of 1975 for the three wells and it shows the remaining reserves based upon these curves as of twelve, thirty-one, seventy-five for all three wells.

Q Exhibit Number Eleven?

A. Exhibit Number Eleven is a method of trying to project what the production of these wells will be over the remaining part of their life and it is a formula whereby if you take the remaining reserves and show what the current rate is and what the economic limit or the final rate of the well will be, it then gives a tabulated factor which you can go to a table and show what the percent decline per year of the well should be..

Q Exhibit Number Twelve?

A. Exhibit Number Twelve is using -- taking the decline curve and using this particular percent decline per year and projecting it to the economic limit and in this case we did project as far as picking a flat life for the first year of what the well has averaged over the first eleven months of 1975. We projected that flat life through 1966 and then

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began this decline determined by this formula and by this it does show what the projected decline of the well would be to produce the reserves, the remaining ultimate reserves that are projected.

- 0 Exhibit Thirteen?
- A. Exhibit Thirteen is the same -- Exhibit Twelve had been one for the Collins, Exhibit Thirteen is for the Manley and Exhibit Fourteen is for the Walz well, using the same procedure.
 - Q Exhibit Fifteen now, Mr. Ellison?
- A Exhibit Fifteen is taking the data that we had just prior, that we have just discussed and for each of the three wells, taking the average daily production for the year, showing what the annual production would be for each of these years and then dividing that by twelve and showing what the monthly production would be for each of these months.
- Q. In relation to this Exhibit, Mr. Ellison, do you have a proposal for the allocation of production between the Pictured Cliffs and Fruitland formations?
- A. What we are proposing is based upon this information that has been developed, is to credit the Pictured Cliffs zone for each month of each year as projected here. For instance, in 1976 the Collins well each month, it would be credited with forty-eight hundred and sixty-seven MCF per day for each month so the well producing up to that month, all of the production

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would be credited to the Pictured Cliffs, anything above that would then be credited to the Fruitland formation.

Skipping clear down to nineteen, eighty-four in the same column of the Collins, in nineteen, eighty-four any production up to eight hundred and fifty-two MCF per day, or any production up to eight hundred and fifty-two MCF for that month would be credited to the Pictured Cliffs and any above that then would be credited to the Fruitland.

- Q Is the ownership identical between the Pictured Cliffs and Fruitland formations?
 - A. Yes, it is.
- Q And are the reservoir characteristics between the two formations such that underground waste would not occur if commingling is granted?
 - A. In my opinion that is correct.
- Q In your opinion will approval of this application result in the recovery of additional gas from each of the commingled zones that would not otherwise be recovered?
 - A. Yes.
- Q In your opinion would approval of the application be in the best interests of conservation, prevention of waste and the protection of correlative rights?
 - A. Yes.
- Q Were Exhibits One through Fifteen prepared by you directly or under your direction and supervision?

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A. Yes, they were.

MR. KELLAHIN: We move the introduction of Exhibits One through Fifteen.

MR. STAMETS: These Exhibits will be admitted.

(THEREUPON, Applicant's Exhibits One through

Fifteen were admitted into evidence.)

MR. STAMETS: Are there questions of the witness?

CROSS EXAMINATION

BY MR. STAMETS:

Q. Mr. Ellison, are there other Fruitland completions in the vicinity of these wells?

A. Yes, there is in the southwest quarter of Section 32 there is a Fruitland dual well that Texaco has completed there and I believe it has been producing since 1959 and apparently, I don't know the reason why or anything else but it has been producing for that period of time and apparently we were unaware of it.

Q What kind of pressure and potential are you looking at in the Fruitland?

A. Well, going to the Texaco well which, as far as we can tell, since the log program they have on theirs and the log program that we have on ours, we have a hard time even telling whether or not that we have any producible sands in ours. If this is granted we will probably run some type of

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log trying to determine whether or not we even have any Fruitland but theirs has produced six hundred and eighty-three million through June of '75. Its initial shut-in pressure was six hundred and thirty-three pounds and the 1973 shut-in pressure was two hundred and sixty-two pounds. That has been a very good well.

- Give them to me again.
- Okay, the initial shut-in pressure was six hundred and thirty-three, in 1973 it was two hundred and sixty-two. And, of course, one of the reasons in requesting permission to commingle is that we would expect because of the cumulative of that particular well, we would expect, if we were to find even this particular sand in our well that it would be partially depleted and, therefore, the remaining reserves would not be that high. Certainly there would be some great risk in trying to drill a new well and getting a pay out on the well.
- Looking at your Exhibits Seven, Eight and Nine, it appears as though the lowest pressure you have on the Manley well is about a hundred and seventy-three pounds and the highest pressure about two hundred and eighteen pounds on the Collins. Do you feel that the pressure differential you might encounter between the Fruitland and the Pictured Cliffs would cause any problems in the wells?
 - I would not anticipate any problems. I think that

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from that standpoint. Do you know if the Fruitland makes any liquids or any water?

once they are put on the line and producing that they would

all be contributing and, therefore, should not be any problems

I think that in some areas there it does as from what we could gather, we were unable to get the production as far as whether it did or did not from them but going by the location we did not feel that it was. Our wells have been making fluid out of the Fruitland and this is part of the reasons for the request for the dual is the fact that we felt that we could not produce mechanically in the small casing that we have. We cannot run the two strings of -in other words, we need a string of tubing in the wells to produce the fluid off of the Pictured Cliffs because we do produce fluid from the Pictured Cliffs and if it were under a packer we would have a problem with them loading off and problems that way. We have four-and-a-half inch drill pipe in there with about a three point eight ID which limits what we can run in the well and, therefore, if we run a string to the Pictured Cliffs zone, we would have problems with it loading off and keeping those wells producing and then if there were production or were fluid in the Fruitland zone, which, of course, it does vary from well to well, then you would have to have another string of tubing in there and we

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would be in problems mechanically as far as being able to produce these wells.

Q Where would you intend to set your tubing in these wells?

A. At this point I would say that we would probably go ahead and set the tubing down right near the top of the Pictured Cliffs zone to keep the fluid off of the Pictured Cliffs just as much as possible.

Q. Would you have a period of testing between wells to determine what you've got or do you just intend to run out there and try all three of them at once?

A No, we very definitely, I think, from the -- we have gamma ray neutron logs that were run on these but they are not very definitive of what we have and we would, first of all, try the Manley well which is the one closest to the Texaco well and see if there is anything there and I think from logs it possibly indicates of the three wells that it has more promise than the other two and we would very definitely just do one well, the Manley first, and determine what we have there before moving on to the other two.

Q Would Consolidated be willing to notify the Director of the Commission's Aztec office at the time, say the first completion, so that it could be evaluated by our engineers in that district?

A. Certainly.

Page_____14

MR. STAMETS: Any other questions of the witness? He may be excused.

(THEREUPON, the witness was excused.)

MR. STAMETS: Anything further in this case?

We will take the case under advisement and take a ten or fifteen minute recess.

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REPORTER'S CERTIFICATE

I, SIDNEY F. MORRISH, a Certified Shorthand Reporter,
do hereby certify that the foregoing and attached Transcript
of Hearing before the New Mexico Oil Conservation Commission
was reported by me, and the same is a true and correct record
of the said proceedings to the best of my knowledge, skill and
ability.

Sidney F. Morrish, C.S.R.

sid morrish reporting Gervice General Court Reporting Service 25 Calle Mgiu, No. 122, Santa Fe, New Mexico 87, Phone (505) 982-9212 I do nereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 5602 neard by me in the Examiner hearing of Case No. 1976.

New Mexico Oil Conservation Commission

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE PATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

CASE NO. 5602 Order No. R-5146

APPLICATION OF CONSOLIDATED OIL & GAS, INC. FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on January 7, 1976, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this 14th day of January, 1976, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Consolidated Oil & Gas, Inc., is the owner and operator of the Collins Well No. 1, Manley Well No. 1, and Walz Well No. 1, located, respectively, in Units E, P, and L of Section 31, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico.
- (3) That the applicant seeks authority to recomplete said wells in such a manner as to commingle Fulcher Kutz-Pictured Cliffs and Aztec-Fruitland gas production within the wellbores of the same.
- (4) That from the Fulcher Kutz-Pictured Cliffs zone, the subject wells are capable of low rates of production only.
- (5) That from the Aztec-Fruitland zone, the subject wells are expected to be capable of low rates of production only.
- (6) That the proposed commingling may result in the recovery of additional hydrocarbons from each of the subject pools, thereby preventing waste, and will not violate correlative rights.
- (7) That the reservoir characteristics of each of the subject times are such that underground waste would not be caused by the proposed commingling provided that the well is not shut-in for an extended period.

- (8) That the applicant should notify the Commission of the completion of said wells in the Fruitland zone.
- (9) That should it be necessary, to prevent waste, the Secretary-Director of the Commission should have authority to rescind the commingling authorized by this order.
- (10) That to afford the Commission the opportunity to assess the potential for waste and to expeditiously order appropriate remedial action, the operator should notify the Aztec district office of the Commission any time any of the subject wells are shut-in for 7 consecutive days.
- (11) That the allocation of the commingled production to the Pictured Cliffs zone and the Fruitland zone in each of said wells should be in accordance with a formula agreed upon by the applicant and the supervisor of the Commission's district office at Aztec.

IT IS THEREFORE ORDERED:

(1) That the applicant, Consolidated Oil & Gas, Inc., is hereby authorized to commingle Fulcher Kutz-Pictured Cliffs and Aztec-Fruitland production within the wellbore of its Collins Well No. 1, Manley Well No. 1, and Walz Well No. 1, located, respectively, in Units E, P, and L, of Section 31, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico.

PROVIDED HOWEVER, that within 10 days of the completion of the Fruitland zone in each of said wells, the applicant shall notify the supervisor of the Commission's district office at Aztec of the completion of such well with sufficient detail to permit the Commission to evaluate the well's potential and the possibility of waste resulting from the wellbore commingling of the Pictured Cliffs and Fruitland zones.

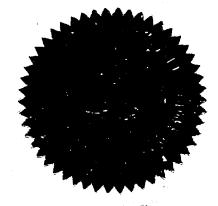
PROVIDED FURTHER, that the Secretary-Director of the Commission may rescind the authority to commingle the Pictured Cliffs and Fruitland zones in any or all of said wells whenever it should appear that such continued commingling would result in waste.

- (2) That the commingled production in said wells shall be allocated to the respective zones in accordance with a formula agreed upon by the applicant and the supervisor of the Commission's district office at Aztec within 45 days after the commingling of Pictured Cliffs and Fruitland production in each of said wells.
- (3) That the operator of the subject wells shall immediately notify the Commission's Aztec district office any time any of the subject wells has been shut-in for 7 consecutive days and shall concurrently present, to the Commission, a plan for remedial action.
- (4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

-3-Case No. 5602 Order No. R-5146

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

STATE OF NEW MEXICO OIL CONSERVATION COMMISSION



PHIL R. LUCERO, Chairman

EMERY C. ARNOLD, Member

JOE D. RAMEY, Member & Secretary

SEAL

DRAFT

dr/

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

CASE NO. 5602

Order No. R- 5/46

APPLICATION OF CONSOLIDATED OIL & GAS, INC. FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.

IN JUAN

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on <u>January 7</u>, 19 76, at Santa Fe, New Mexico, before Examiner Richard L. Stamets

NOW, on this day of January, 1976, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Consolidated Oil & Gas, Inc., is the EXMEX owner and operator of the Collins Well No. 1, Manley Well No. 1, and Walz Well No. 1, located, respectively, in Units E, P, and L of Section 31, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico.
- (3) That the applicant seeks authority to recomplete said wells in such a manner as to commingle Fulcher Kutz-Pictured Cliffs and Aztec-Fruitland gas production within the wellbores of the same.
- (4) That from the Fulcher Kutz-Pictured Cliffs zone, the subject wells are capable of low rates of production only.

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- (5) That from the Aztec-Fruitland zone, the subject wells are expected to be capable of low rates of production only.
- (6) That the proposed commingling may result in the recovery of additional hydrocarbons from each of the subject pools, thereby preventing waste, and will not violate correlative rights.
- (7) That the reservoir characteristics of each of the subject zones are such that underground waste would not be caused by the proposed commingling provided that the well is not shut-in for an extended period.
- (8) That the applicant should notify the Commission of the completion of the said wells in the Fruitland zone.
- (9) That should it be necessary to prevent waste, the have authority to Secretary-Director of the Commission should rescind the commingling authorized by this order.
- (10) That to afford the Commission the opportunity to assess the potential for waste and to expeditiously order appropriate remedial action, the operator should notify the Aztec district office of the Commission any time the subject well is shut-in for 7 consecutive days.
- (11) That the allocation of the commingled production to the Pictured Cliffs zone and the Fruitland zone in each of said wells should be in accordance with a formula agreed upon by the applicant and the supervisor of the Commission's district office Aztec.

IT IS THEREFORE ORDERED:

(1) That the applicant, Consolidated Oil & Gas, Inc., is hereby authorized to commingle Fulcher Kutz-Pictured Cliffs and Aztec-Fruitland production within the wellbore of the Collins Well No. 1, Manley Well No. 1, and Walz Well No. 1, located, respectively, in Units E, P, and L of Section 31, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico.

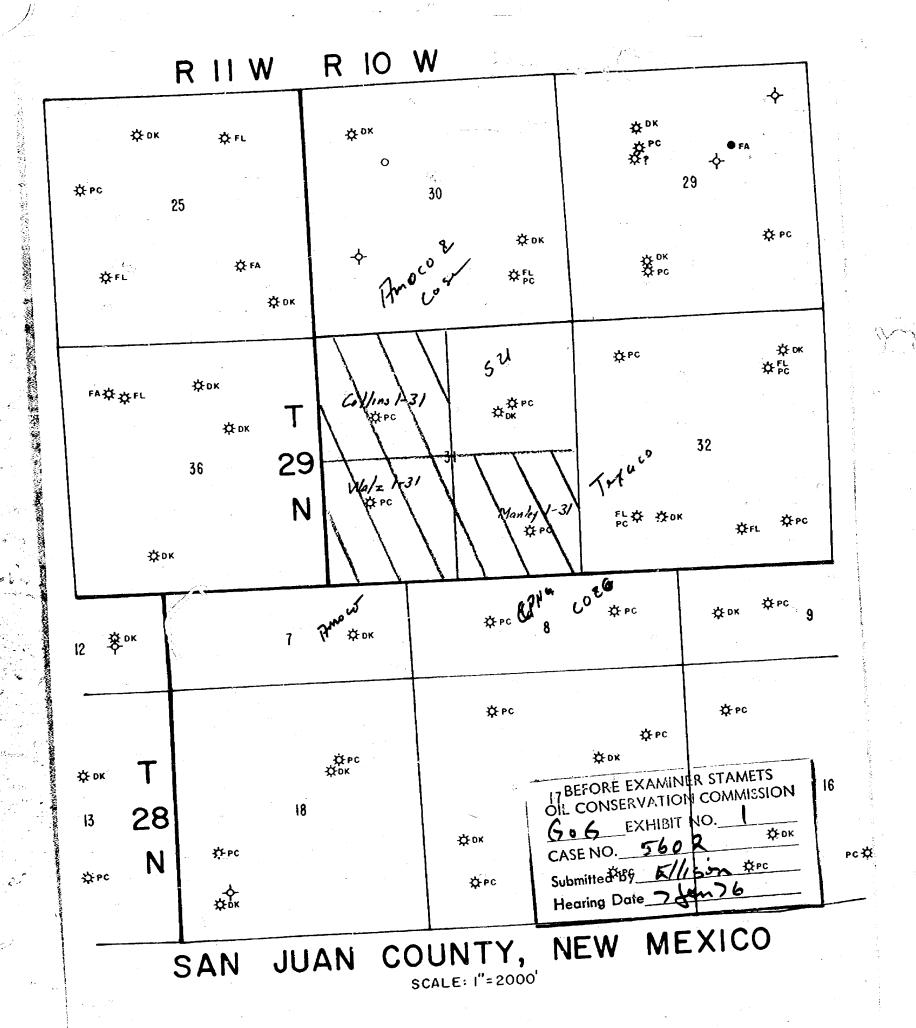
Case No. 5602 Order No. R-

PROVIDED HOWEVER, that within 10 days of the completion of the Fruitland zone in each of said wells, the applicant shall notify the supervisor of the Commission's district office at Aztec of the completion of such well with sufficient detail to permit the Commission to evaluate the well's potential and the possibility of waste resulting from the wellbore commingling of the Picture? Cliffs and Fruitland zones.

PROVIDED FURTHER, that the Secretary-Director of the Commission may rescind the authority to commingle the Pictured Cliffs and Fruitland zones in any or all of said wells whenever it should appear that suxek such continued commingling would result in waste.

- (2) That the commingled production in said wells shall be allocated to the respective zones in accordance with a formula agreed upon by the applicant and the supervisor of the Commission's district office at Aztec within 45 days after the commingling of Pictured Cliffs and Fruitland production in each of said wells.
- notify the Commission's Aztec district office any time the wellave been shut-in for 7 consecutive days and shall concurrently present, to the Commission, a plan for remedial action.
- (4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

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





Consolidated Oil & Gas, Inc.

LINCOLN TOWER BUILDING
1860 LINCOLN STREET
DENVER, COLORADO 80203
(303) 255-1751

December 18, 1975

U. S. Department of the Interior Geological Survey P. O. Box 959 Farmington, New Mexico 87401

RECEIVED

DEC 2 2 1975

U. S. GEOLOGICAL SURVEY

San Juan County, New Mexico

Re: Permission to Commingle
Pictured Cliff and Fruitland
Collins 1-31
Manley 1-31
Walz 1-31
Section 31-T29N-R10 W
Fulcher Kutz Pictured Cliff Field

Gentlemen:

Consolidated Oil & Gas, Inc. is seeking permission from the U. S. Geological Survey to attempt a recompletion in one or more of the above referenced wells in the Fruitland formation and, if successful, commingle production downhole with the Pictured Cliff. Subject wells are presently single gas producers from the Pictured Cliff formation.

The proposed division of production would be by establishing each well's probable producing rate from the Pictured Cliff based on past pressures and producing history and then to credit the excess production from each well to the Fruitland.

The proposal to commingle is based on the following:

- 1. Correlative rights in both zones will be protected since the royalty and working interest ownership is the same for both the Fruitland and Pictured Cliff.
- 2. The economics to drill a single zone Fruitland test are very COMMUNION questionable.

 OIL CONSTRUMTION 2

COS EXHIBIT NO. 2

CASE NO. 5602

Submitted by Ellisim ()

Hearing Date > +1026

U. S. Department of the Interior Geological Survey December 18, 1975 Page 2

- A dual completion of the two zones is mechanically impractical if not impossible in all of the wells due to:
 - The production casing having a 3.826" ID making it impossible to run dual tubing strings which can be swabbed or pumped to remove fluid when a zone loads up.
 - Water production from the Pictured Cliff zone and potential water production from the Fruitland zone creating production problems if the Pictured Cliff is produced up the tubing and the Fruitland up the tubing-casing annulus.
- Assuming a successful Fruitland completion, additional gas reserves should be produced due to higher gas velocity from the commingled zones keeping fluids unloaded off the formation which, in turn, will allow production to a lower pressure.
- Additional gas reserves will be produced simply by the combined production rate being able to remain profitable longer then a single zone rate.

We have filed an application with the New Mexico Oil Conservation Commission to hear this case January 7th. We realize the Holiday season is upon us but would appreciate your approval to commingle in time to support our application before the Commission.

Yours very truly,

CONSOLIDATED OIL & GAS, INC.

Floyd E. Ellison, Jr.

Area Production Manager

Flagh & Ellian Jr.

FEE:lt



United States Department of the Interior

GEOLOGICAL SURVEY

P. O. Box 959 Farmington, New Mexico 87401

Dec. 23, 1975

Consolidated Oll and Gas, Inc. 1860 Lincoln Street Denver, Colo. 80203

Returned are sundry notices for commingling Pictured Cliffs and Fruitland gas for Collins 1-31, Manley 1-31, and Walz 1-31 wells, Fruitland gas for Collins 1.31, New Mexico. all in sec. 31, T. 29 N., R. 10 W., San Juan Co., New Mexico.

The notices have all been approved subject to like approval by the Oll Conservation Commission.

Sincerely yours,

M. L. Seelinger Acting District Engineer

BEFORE EXAMINER STAMETS OIL CONSERVATION COMMISSION 606 EXHIBIT NO. 3 CASE NO. 560 2 Submitted by___ Hearing Date 7 trable

(Do not use this form for pro- Use "APPL	GEOLOGICAL SURVEY	· 	j.	New Mexico	
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OLL GAS TE	posals to drill of to deepen or p ICATION FOR PERMIT—" for st	olug back to a different uch proposals.)		7. UNIT AGREEMENT N	ASIE
WE'L WELL X OTHER					
Consolidated Oil &	Gas, Inc.	 -		Collins Well No.	.ME
1860 Lincoln Stree	t, Denver, Colorae	do 80203		1-3	1
LOCATION OF WELL (Report location See also space 17 below.) At surface	•	•		Fulcher Kut:	z PC
1750' FNL and 1190'	FWL Section 31,	129N-R10W N	MPM	Sec. 31-T29	.
PERMIT NO.	15. ELEVATIONS (Show wheth	ner DF, RT, GR, etc.)		12. COUNTY OR PARIS	
	KB 5657		<u>-</u>	San Juan	New Mexi
Check A	Appropriate Box To Indica	te Nature of Natic	• • •	ner Data	
TEST WATER SHUT-OFF PRACTURE TREAT SHOOT OR ACIDIZE BEPAIR WELL (Other) DESCRIBE PROPOSED OR COMPLETED or COMPLETED or Composed work. If well is directly the complete of the composed work.	MULTIPLE COMPLETE ABANDON* CHANGE PLANS COmmingle DEFERTIONS (Clearly state all perctionally drilled, give subsurface	(Other) (Norn-Comp	E: Report results of letion or Recompletic pertinent dates, in	ALTERING ABANDONMI multiple completion on Report and Log for cluding estimated da depths for all market	on Wellorm.)
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CASE NO. 560 Submitted by E/ Hearing Dute 2	1.5m	v. ş	GEOLOGICAL SU	PAEA	
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I hereby certify that the foregoing SIGNED Floyd 66		Area Produc	tion Manage	r DATE 12/1	8/75
(This space for Federal or State	•				
CONDUCTIONS OF APPROVAL II	TITLE .			DATE	

*See Instructions on Reverse Side

E. T. MCGRATH DISTRICTI ENGINEER

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				7. UNIT AGREE	MENT NAME
WE'LL GAR WELL OT	THER	~		ļ	
NAME OF OPERATOR				8. FARM OR G	EASE NAME
Consolidated Oil	& Gas, Inc.	** .		Manl	ley
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See also space 17 below.) At surface	intion clearly ago in accordance	with any State requires	nents.		POOL, OR WILDCAT
				Fulcher	KUTZ PO
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				Sec. 31	-T29N-R10
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SHOOT OR ACIDIZE	ABANDON® CHANGE PLANS		ING OR ACIDIZING	A8A	INDONMENT*
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(Other) DESCRIBE PROPOSED OR COMPLE proposed work. If well is nent to this work.) *	Commingle TED OFERATIONS (Cléarly state all directionally drilled, give subsur	l pertinent details, and	completion or Reco	empletion Report and ites, including estim	d Log († ± .) sated date of startin
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*See Instructions on Reverse Side

P. I. McGRATH DISTRICT, ENGINEER

Form 9-331 (May 1983)	UNITED STA		SUBMIT IN TRIPLICATES	Form appro- Budget Burg 6. LEASE DESIGNATIO:	eau No. 42-R1424
	DEPARTMENT OF THE		(verse side)	New Mexico	
SU	NDRY NOTICES AND R		WELLS	6. IF INDIAN, ALLOTT	
	is form for proposals to drill or to d Use "APPLICATION FOR PERMI				
OIL GAS	OTHER		,	7. UNIT AGREEMENT N	AMA
2. NAME OF OPERATOR				8. FARM OR LEASE NA	ME
Consolida	ted Oil & Gas, Inc.		•	Walz	
3. ADDRESS OF OPERA	OR	£70g		9. WELL NO.	-
1860 Linc	oln Street, Denver, C (Report location clearly and in accord	olorado 802	03	1-31	
See also space 17	elow.)	TAUCE WILL ALL STAC	te requirements.	Fulcher Kutz	
	and 960' FWL Section	31-T29N-	RIOW	11. SEC., T., B., M., OB SURVEY OR ARE	BLR. AND
		 , -		Sec. 31-T29	N_RIOW
14. PERMIT NO.	15. BLEVATIONS (Show whether DF, RT,	GR, etc.)	12. COUNTY OR PARIS	
	KI	3 5723		San Juan	New Mex
16.	Check Appropriate Box 1	o Indicate Natu	ore of Notice, Report, or C	Other Data	
	NOTICE OF INTENTION TO:	i	RUBBRQ	UENT REPORT OF:	
TEST WATER SHU	POFF PULL OR ALTER CAS	INO	WATER SHUT-OFF	REPAIRING	WELL
FRACTURE TREAT	MULTIPLE COMPLET		PRACTURE TREATMENT	ALTERING	CABING
SHOOT OR ACIDIZE	ABANDON*		SHOOTING OR ACIDIZING	ABANDONM	ENT*
REPAIR WELL	CHANGE PLANS		(Other)	-4144-1	
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BIGNED Iloy	and the foregoing is true and correct	TITLE Are	a Production Mana	ger DATE 12/	18/75
(This space for F	ederal or State office use)		· ·		
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P. T. McGRA	TH " / " "		e compression de la compression della compression de la compression della compressio		

DISTRICT ENGINEER

BHP/Z PSIA WELL NAME COLLINS 1-31 (PICTURE CLIFFS)

LOCATION SW/NW SEC. BI, T29N+R OW

COUNTY SAN JUAN STATE NEW MEXICO

TEST DATA

CATE WHS P SETIME BHP/Z CUM PROCE

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1/1/65 3 O CALCULA EB BEFORE EXAMINER STAMETS
OIL CONSERVATION COMMISSION
CASENO. 53.2 Submitted Ş 0 0 CUM GAS PROD. (MMCF)

BHP/Z PSIA WELL NAME MANLEY 1-33 (PICTURE LOGATION SE/SE SEC 3, T29N-RIOW COUNTY SAN JUAN STATE NEW M N STATE NEW MEXICO O CALCULATED Submitted by **©**\$88 ¥0. ↓ Hadima Dale . ф Ф SION

BHP/Z PSIA WELL NAME WALZ (-30(PICTURE CLIFFS)
OGATION NW/SW SEC.31, T29N-RIOW
COUNTY SAN JUAN STATE NEW MEXICO AN JUAN STATE NE

TEST DATA

WHS.P SETIME BHP/Z

End State

O CALCULA ED BEFORE EXMAJNER STAILERS CASE NO. EX Submitted by DEN TESTINE 530 2 ø Ø

TABLE I

	Collins		
Cum. 11/30/75	4.44.77	Manley	Walz
Cum. 12/31/74	513,092	522, 667	711, 091
11 Mo. 1975 Production	459,744	491, 907	638, 651
	53, 348	30,760	72, 440
Avg/Day, 11 Mo.	160	93	217
Ultimate Recovery	785,000	715,000	1,055,000
Est. Cum. 12/31/75	518,000	526, 000	718,000
Remaining Reserves 12/31/75	267,000	189,000	337, 000

Determination of straight line decline rate in percent per year on semi log paper

R = (F) (.0833)(Pi-Pe) Where: R = remaining reserves, Mcf
F = tabulated factor (table of factors

vs decline rate)

Pi current rate, Mcf/year

Pe economic limit, Mcf/year

BEFORE EXAMINER STAMETS OIL CONSERVATION COMMISSION
Co 6 EXHIBIT NO. 10
CASE NO. 67 02
Submitted by K//15
Hearing Date 7 + 7

TABLE II

Determination of straight line decline rate in percent per year on semi log paper

$$R = (F) (.0833)(Pi-Pe)$$

Where: R = remaining primary, Mcf

F = tabulated factor (table of factors vs decline rate)

Pi = current rate, Mcf/year Pe = economic limit, Mcf/year

Converting $F = \frac{R}{(.0833)(Pi-Pe)}$ Where: R is reserves after one year flat life when decline starts

Collins

$$F = 267,000 - 58,400 = 50.82$$

(.0833)(58,400-9125)

Table shows 21% decline/year

Manley

$$\mathbf{F} = \frac{189,000 - 33,945}{(.0833)(33,945-9125)} = 75.00$$

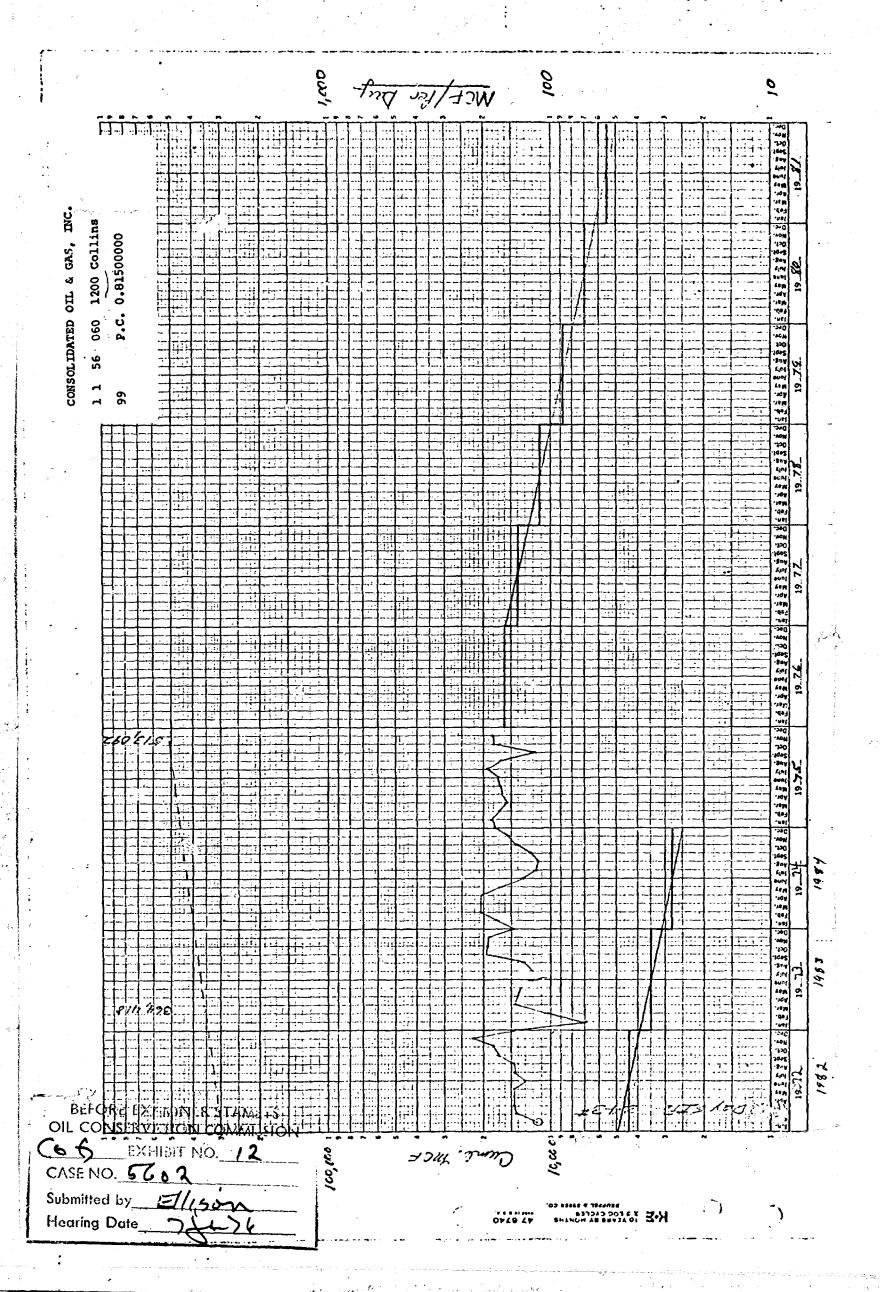
Table shows 14.8% or 15% decline/year

Walz

$$\mathbf{F} = \frac{337,000 - 79,205}{(.0833)(79,205-9125)} = 44.16$$

Table shows 23.8% or 24% decline/year

BEFORE EXAMINER STAMETS
OIL CONSERVATION COMMISSION
CASE NO. 570 2
Submitted by Ellism
Hearing Date 7 4-16



& you frompost - IDW & CONSOLIDATED DIL & GAS, INC 1 1 56 060 4900 Manley 99 P.C. 0.81500000 ध्य FOR CLAND & Submitted by_ Hearing Date _______

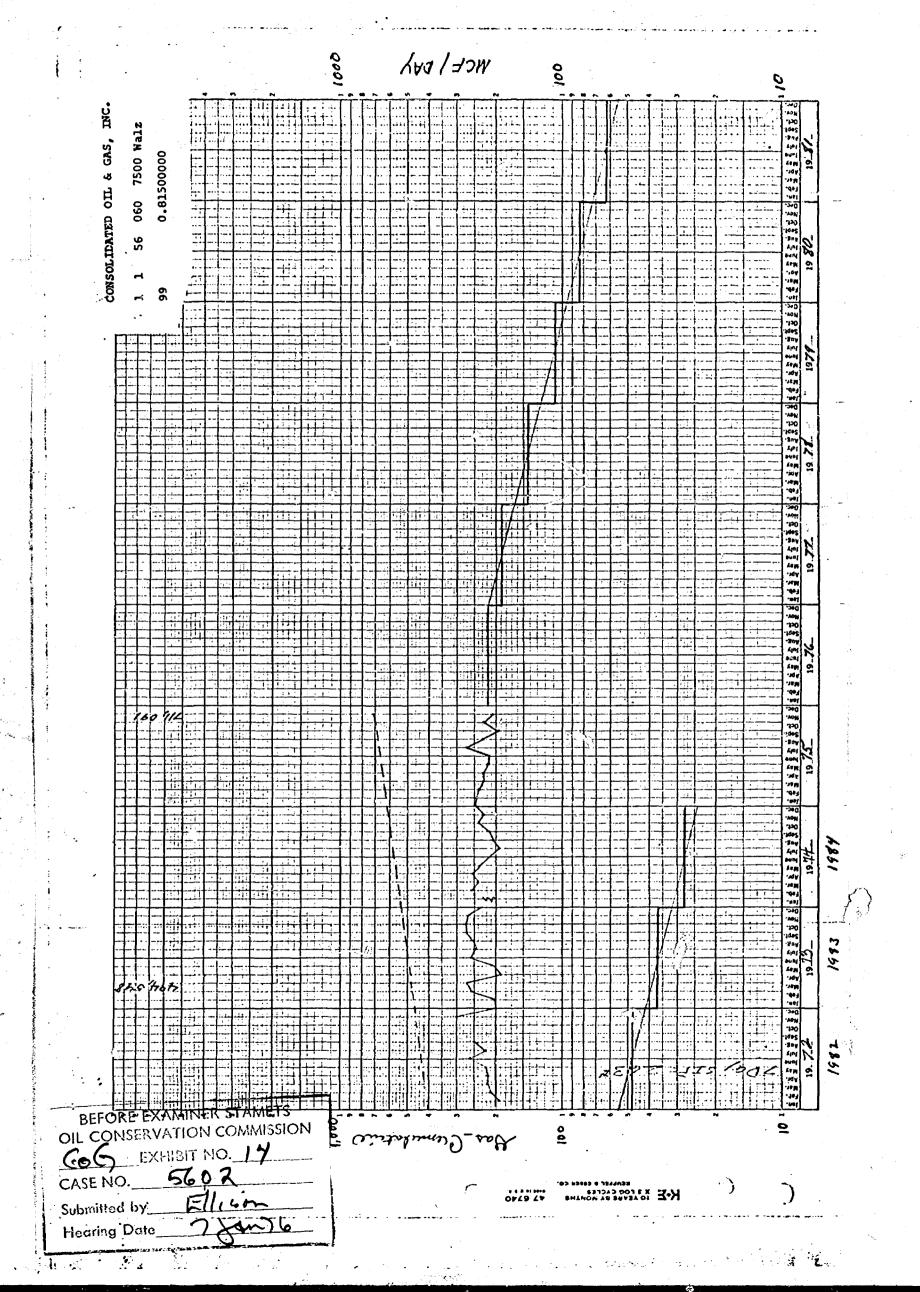


TABLE III

COLLINS				MANLEY			WALZ		
•	Mcf/Day	Annual	Monthly	Mcf/Day	Annual	Monthly	M f/Day	Annual	Monthly
Year	Average	Prod.	Prod.	Average	Prod.	Prod.	Average	Prod.	Prod.
1976	160	58,400	4,867	93	33,945	2,829	217	79, 205	6,600
1977	140	51,100	4,258	86	31,390	2,616	190	69,350	5,779
1978	112	40,880	3, 407	73	26,645	2,220	143	52, 195	4,350
1979	88	32, 120	2,677	63	22,995	1,916	108	39,420	3,285
1980	70	25,550	2,129	54	19,710	1,643	83	30, 295	2,525
1981	.55	20,075	1,673	46	16,790	1,399	63	22,995	1,916
1982	44	16,060	1,338	39	14,235	1,186	48	17,520	1,460
1983	35	12,775	1,065	33	12,045	1,004	37	13,505	1,125
1984	28	10,220	852	28	10,220	852	28	10, 220	852 €
		267, 180			187,975		· · · · · · · · · · · · · · · · · · ·	334,705	
	· · · · · · · · · · · · · · · · · · ·	7s 267,000		vs	189,000		V		

Based on 21%/year decline rate

Based on 15%/year decline rate Based on 24%/year decline rate

BEFORE EXAMINER STAMETS OIL CONSERVATION COMMILSION
CASE NO. 5602
Submitted by Eligon
Hearing Date

P. O. Box 959 Farmington, Now Maxico 87401

Dec. 25, 1975

Consolidated OII and Gas, Inc. 1860 Lincoln Street Denver, Colo. 80203

Gentlemen:

Returned are sundry notices for Commingling Pictured Cliffs and Fruitland gas for Collins 1-31, Manley 1-31, and Walz 1-31 wells, all in sec. 31, T. 29 N., R. 10 W., San Juan Co., New Mexico.

The notices have all been approved subject to like approval by the Oli Conservation Commission.

Sincerely yours,

(Orig. Sgd.)M. L. SEELINGER

M. L. Seelinger Acting District Engineer

> DEC 24 1975 OIL CON. COM. DIST. 3

Exhibit3 Case 5602



Consolidated Oil & Gas, Inc.

LINCOLN TOWER BUILDING 1860 LINCOLN STREET DENVER, COLORADO 80203 (303) 255-1751

December 18, 1975

U. S. Department of the Interior Geological Survey P. O. Box 959 Farmington, New Mexico 87401 RECEIVED

DEC 2 2 1975

U. S. GEOLOGICAL SURVEY



Re: Permission to Commingle
Pictured Cliff and Fruitland
Collins 1-31
Manley 1-31
Walz 1-31
Section 31-T29N-R10 W
Fulcher Kutz Pictured Cliff Field
San Juan County, New Mexico

Gentl emen:

Consolidated Oil & Gas, Inc. is seeking permission from the U. S. Geological Survey to attempt a recompletion in one or more of the above referenced wells in the Fruitland formation and, if successful, commingle production downhole with the Pictured Cliff. Subject wells are presently single gas producers from the Pictured Cliff formation.

The proposed division of production would be by establishing each well's probable producing rate from the Pictured Cliff based on past pressures and producing history and then to credit the excess production from each well to the Fruitland.

The proposal to commingle is based on the following:

- 1. Correlative rights in both zones will be protected since the royalty and working interest ownership is the same for both the Fruitland and Pictured Cliff.
- 2. The economics to drill a single zone Fruitland test are very questionable.

Exhibit 2 Case 5602 U. S. Department of the Interior Geological Survey December 18, 1975 Page 2

- A dual completion of the two zones is mechanically impractical if not impossible in all of the wells due to:
 - The production casing having a 3.826" ID making it impossible to run dual tubing strings which can be swabbed or pumped to remove fluid when a zone loads up.
 - Water production from the Pictured Cliff zone and potential water production from the Fruitland zone creating production problems if the Fictured Cliff is produced up the tubing and the Fruitland up the tubing-casing annulus.
- Assuming a successful Fruitland completion, additional gas reserves should be produced due to higher gas velocity from the commingled zones keeping fluids unloaded off the formation which, in turn, will allow production to a lower pressure.
- Additional gas reserves will be produced simply by the combined production rate being able to remain profitable longer then a single zone rate.

We have filed an application with the New Mexico Oil Conservation Commission to hear this case January 7th. We realize the Holiday season is upon us but would appreciate your approval to commingle in time to support our application before the Commission.

Yours very truly,

CONSOLIDATED OIL & GAS, INC.

Flagh & Ellison, Jr.

Floyd E. Ellison, Jr.

Area Production Manager

DEC 24 1975 OIL CON. COM DIST. 3

FEE:lt

DOCKET: EXAMINER HEARING - WEDNESDAY - JANUARY 7, 1976

9 A.M. - OIL CONSERVATION CONVISSION CONFERENCE ROOM,
STATE LAND OFFICE BUILDING, SANTA FE, NEW MENICO
The following cases will be heard before Richard L. Stamets, Examiner or Daniel
S. Nutter, Alternate Examiner:

Application of Champlin Petroleum Company for special pool rules, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks the prozulgation of special pool rules for the East Carlsbad-Wolfcamp Gas Pool, Eddy County, New Mexico, including a provision for 320-acre spacing.

Application of Consolidated Oil & Gas, Inc. for downhole comingling, Rio Arriba County, New Mexico. Applicant, in the above-styled cause, seeks approval to commingle Tapacito-Pictured Cliffs and Basin-Dakota gas production in the wallbore of its Tribal "C" Well No. 10-7, Rio Arriba County, New Mexico. CASE 5601:

Application of Consolidated Oil & Gas, Inc. for downhole comingling, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks authority to commingle Fulcher Kutz-Pictured Cliffs and Aztec-Fruitland gas production in the wellbore of its Collins Well No. 1, Manley Well No. 1, and Walz Well No. 1, located, respectively, in Units E. P. and L of Section 31, Township 29 North, Range 10 West, San Juan County, New Mexico. CASE 5602:

San Juan County, New Mexico.

Application of Burleson and Huff for compulsory pooling, a non-standard gas proration unit, and an unorthodox location, Lea County, New Mexico.

New Mexico.

Yeant, in the above-styled cause, seeks an order pooling all 4. All interests in the Jalmat Cas Pool underlying the NW/4 of Section 35. Township 25 South, Range 37 East, Lea County, cant further seeks the pooling of all mineral interests in the Langlie-Mattix Pool underlying each of the following tracts in said Section 35 to form three standard 40-acre proration units: the NE/4 NW/4, to be dedicated to applicant's Dabbs Well No. 1, located 330 feet from the North line and 2310 feet from the West line of said Section 35; the SE/4 NW/4, to be dedicated to applicant's Dabbs Well No. 3, located 1980 feet from the North and West lines of said Section 35; and the SW/4 NW/4, to be dedicated to a veil to be deficited on said tract at a standard Langlie Mattix Pool location. In the event re-entry into either the Dabbs Well No. 1 or No. 3 is unsuccessful, applicant proposes to drill a replacement well at a standard location on its tract. Applicant further proposes to dedicate the 160-acre Jalmat proration unit to one of the three above-described wells, and in the event it should be the Dabbs Well No. 1, applicant seeks approval for the unorthodox Jalmat location of said well. Also to be considered will be the designation of re-entering, drilling, and completing said wells and the allocation of supervision. Also to be considered will be the designation of the applicant as operator of the wells and a charge for the risk involved in re-entering, drilling, and completing said wells.

Application of Birleson & Huff for a waterflood project, Lea County, and the second second

Application of Birleson & Huff for a waterflood project, Lea County, New Yerico. Applicant, in the above-styled cause, seeks authority to institute a waterflood project in the Querecho Plains-Queen Pool by the injection of water into the Queen formation through its Anadarko Federal Well No. 6 to be drilled at a junorthodox location in the approximate center of the SW/4 of Section 27, Township 18 South, Range 32 East, Lea County, New Mexico. Applicant further seeks an administrative procedure for approval of additional wells at standard and non-standard locations within the project area. CASE 5604:

Examiner Fearing - Wednesday - January 7, 1976

Docket No. 1-76

CASE 5605: Application of Saguaro Oil Company for special pool rules, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks the promulgation of special pool rules for the Table Mesa-Dakota Oil Pool, San Juan County, New Mexico, including a provision for 2 1/2-acre spacing.

Application of Cities Service 0il Company for downhole comingling, Lea County, New Mexico. Applicant, in the above-styled cause, seeks approval to commingle Tubb and Drinkard production in the weilbore of its Brunson B Well No. 3, located in Unit M of Section 3, Township 22 South, Range 27 East, Lea County, New Mexico. CASE 5606:

Application of Black River Corporation for an unorthodox oil well location, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks authority to drill an undesignated Canyon formation well at an unorthodox location 280 feet from the South line and 150 feet from the West line of Section 33, Township 25 South, Range 24 East, Eddy County, New Mexico. CASE 5607:

Application of Northern Natural Gas Company for a unit agreement, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks approval for the Magrudar Hill Unit Area comprising 2,256 acres, more or less, of Federal, State, and fee lands in Township 22 South, Range 25 and 26 East, Eddy County, New Mexico.

Application of Yates Petroleum Corporation for an unorthodox gas well location, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks approval for the unorthodox location of its Nellor "EO" Well to be drilled at a point 1980 feet from the North line and 660 feet from the West line or in the alternative, 660 feet from the North and West lines of Section 30, Township 17 South, Range 26 East, Eddy County, New Mexico, the N/2 of said Section 30 to be dedicated to the well. CASE 5609:

Application of Yates Petroleum Corporation for an unorthodox gas well location, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks approval for the unorthodox location of its Caskey "EV" Well to be drilled at a point 660 feet from the South line and 1400 feet from the West line of Section 30, Township 17 South, Range 26 East, Eddy County, New Mexico, the S/2 of said Section 30 to be dedicated to the well. CASE 5610:

CASE 5611: Application of David C. Collier for an unorthodox oil well loca-Application of David C. Collier for an unorthodox oil well location, Eddy County, New Yexico. Applicant, in the above-styled cause, seeks approval for the morthodox location of his Welch State No. 7 Well located 1330 feet from the South and Vest lines of Section 17, Township 18 South, Range 28 East, Artesia Pcol, Eddy County, New Mexico, said well having formerly been a voter injection well.

Application of Dalport Oil Corporation for exception to the provisions of Order No. R-3221, Chaves County, New Mexico. Applicant, in the above-styled cause, seeks as an exception to the provisions of Cormission Order No. R-3221 permission to dispose of produced salt water from its State C Wells Nos. 1, 2, and 3, iccated in Units D, E, and L, respectively, of Section 16, Township 15 South, Range 30 East, Double L Queen Associated Pool, Chaves County, New Mexico, in an unlined surface pit located in Unit E of said Section 16. CASE 5612:

CASE \$596: (Reopened & Readvertised)

Application of Burk Royalty Company for statutory unitization, Chaves County, New Mexico. Applicant, in the above-styled cause, seeks an order unitizing, for the purpose of secondary recovery, all mineral interests in the Queen formation underlying the following-described lends, Double L-Queen Pool, Chaves County, New Moxico.

are 5602

KELLAHIN AND FOX ATTORNEYS AT LAW

SANTA FE, NEW MEXICO 87501 OIL CONSERVATION COMM.

Santa FO TELEPHONE 982-4315 AREA CODE 505

December 17, 1975

Mr. Joe Ramey, Secretary-Director New Mexico Oil Conservation Commission P. O. Box 2008 Santa Fe, New Mexico 87501

Dear Mr. Ramey:

JALON W. KELLAHIN ROBERT E.FOX W.THOMAS KELLAHIN

Enclosed is the application of Consolidated Oil & Gas, Inc., for down-hole commingling. San Juan County, New Mexico. We request that hearing be set for January 7, 1975.

Very truly yours,

Jason W. Kellohii Jason W. Kellahin

JWK:kjf

Enclosure

DOCKET MAILED

Date 12/29/75

BEFORE THE

OIL CONSERVATION COMMISSION OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF CONSOLIDATED OIL & GAS, INC., FOR DOWN-HOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO

APPLICATION

Comes now Consolidated Oil & Gas, Inc., and applies to the Oil Conservation Commission of New Mexico for authority to commingle production in the well bore in three wells located in San Juan County, New Mexico, as follows:

- 1. All of the wells involved are presently completed in and producing from the Pictured Cliffs formation. Applicant proposes to recomplete the wells for production of gas from the Fruitland formation, and commingle the production with gas from the Pictured Cliffs, in the well-bore.
- 2. The wells applicant proposes to complete for commingling are:
- a. Collins 1-31, located in Unit E, 1750 feet from the North line and 1190 feet from the West line of Section 31, Township 29 North, Range 10 West, N.M.P.M.
- b. Manley 1-31, located in Unit P, 935 fest from the South line and 1050 feet from the East line, Section 31, Township 29 North, Range 10 West, N.M.P.M.
- c. Walz 1-31, located in Unit L, 1680 feet from the South line and 960 feet from the West line of Section 31, Township 29 North, Range 10 West, N.M.P.M.

- 3. It is anticipated that any gas production from the Fruitland will be marginal, and not in sufficient quantity to justify drilling or dual completion of a well. Pictured Cliffs production has been declining, and the approval of this application will prolong the productive life of the wells from both zones.
- 4. Approval of this application will result in the recovery of gas that would not otherwise be recovered, will prevent waste, and will protect correlative rights.

WHEREFORE applicant prays that this application be set for hearing before the Commission or the Commission's duly appointed examiner, and that after notice and hearing as required by law, the Commission enter its order approving the commingling of production as proposed.

Respectfully submitted,
CONSOLIDATED OIL & GAS, INC.

By Joson W. Kallahni

Rellahin & Fox
P. O. Box 1769
Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT



BEFORE THE

OIL CONSERVATION COMMISSION OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF CONSOLIDATED OIL & GAS, INC., FOR DOWN-HOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO

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Respectfully submitted,
CONSOLIDATED OIL & GAS, INC.

By Jasyn W. Kellahi

Kellahin & Fox P. O. Box 1769 Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT



BEFORE THE

OIL CONSERVATION COMMISSION OF NEW MEXICO

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CONSOLIDATED OIL & GAS, INC.

By Jasan W. Kullahin

Kellahin & Fox P. O. Box 1769 Santa Fe, New Mexico 87501

ATTORNEYS FOR APPLICANT

Consolidated Die and She , Inc. 13 downkou Communiching down holo