DATE IN 6/9/98	SUSPENSE 6/29/98	ENGINEER DC	LOGGED BY KV	TYPE DHC

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

2040 South Pacheco, Santa Fe, NM 87505

1984

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location]
[DD-Directional Drilling] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

RECEIVED
JUN - 9 1998
OIL CONSERVATION DIVISION

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Directional Drilling

❑ NSL ❑ NSP ❑ DD ❑ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement

☒ DHC ❑ CTB ❑ PLC ❑ PC ❑ OLS ❑ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

❑ WFX ❑ PMX ❑ SWD ❑ IPI ❑ EOR ❑ PPR

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ❑ Does Not Apply

[A] ❑ Working, Royalty or Overriding Royalty Interest Owners

[B] ☒ Offset Operators, Leaseholders or Surface Owner

[C] ❑ Application is One Which Requires Published Legal Notice

[D] ☒ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

[E] ❑ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ❑ Waivers are Attached

[3] **INFORMATION / DATA SUBMITTED IS COMPLETE** - Certification

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. ***I understand that any omission of data (including API numbers, pool codes, etc.), pertinent information and any required notification is cause to have the application package returned with no action taken.***

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name	Signature	Title	Date
		Reg Admin	6-8-98

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980
DISTRICT II
811 South First St., Artesia, NM 88210-2835
DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410-1693

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505-6429

APPLICATION FOR DOWNHOLE COMMINGLING

Form C-107-A
New 3-12-96

APPROVAL PROCESS :
_X_ Administrative __ Hearing

EXISTING WELLBORE
_X_ YES ___ NO

BURLINGTON RESOURCES OIL & GAS COMPANY — PO Box 4289, Farmington, NM 87499
Operator — Address

San Juan 28-6 Unit	#203M	O Sec 7, T27N, R6W	Rio Arriba, New Mexico
Lease	Well No.	Unit Ltr. - Sec - Twp - Rge	County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7462 API NO. 30-039-25451 Federal _X_ , State _____, (and/or) Fee _____

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	4850'-5757'		7454'-7658'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Current) a. 394 psia @ 5304'	a.	Measured a. 789 psia @ 7556'
	(Original) b. 1282 psia @ 5304'	b.	b. 3396 psia @ 7556'
6. Oil Gravity (°API) or Gas BTU Content	1248		1134
7. Producing or Shut-In?	Producing		Producing
Production Marginal? (yes or no)	Yes		Yes
* If Shut-In and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: N/A Rates:	Date: Rates:	Date: N/A Rates:
* If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: 4/6/98 Rates: 27 MCFD 0 BO, 0 BW	Date: Rates:	Date: 4/6/98 Rates: 131 MCFD, 0.8 BO, 0 BW
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: N/A Gas: N/A will be supplied upon completion	Oil: % Gas: % 	Oil: N/A Gas: N/A will be supplied upon completion

9. If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data.

10. Are all working, overriding, and royalty interests identical in all commingled zones? ___Yes _X_ No
If not, have all working, overriding, and royalty interests been notified by certified mail? ___Yes _X_ No
Have all offset operators been given written notice of the proposed downhole commingling? _X_ Yes ___No

11. Will cross-flow occur? _X_ Yes __ No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. _X_ Yes _____No (If No, attach explanation)

12. Are all produced fluids from all commingled zones compatible with each other? _X_ Yes ___ No

13. Will the value of production be decreased by commingling? ___ Yes _X_ No (If Yes, attach explanation)

14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. _X_ Yes ___ No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10696

16. ATTACHMENTS:
* C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
* Production curve for each zone for at least one year. (If not available, attach explanation.)
* For zones with no production history, estimated production rates and supporting data.
* Data to support allocation method or formula.
* Notification list of all offset operators.
* Notification list of working, overriding, and royalty interests for uncommon interest cases.
* Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE R L Midkiff TITLE Production Engineer DATE 06-08-98

TYPE OR PRINT NAME Kevin Midkiff TELEPHONE NO. (505) 326-9700

District I
PO Box 1980, Hobbs, NM 88241-1980
District II
PO Drawer DD, Artesia, NM 88211-0719
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Form C-10
Revised February 21, 199
Instructions on bac
Submit to Appropriate District Offic
State Lease - 4 Copie
Fee Lease - 3 Copie

☐ AMENDED REPOR

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	2 Pool Code	3 Pool Name
30-039-	72319/71599	Blanco Mesa Verde/Basin Dakota

4 Property Code	5 Property Name	6 Well Number
	San Juan 28-6 Unit	203M

7 OGRID No.	8 Operator Name	9 Elevation
14538	MERIDIAN OIL INC.	6568'

10 Surface Location

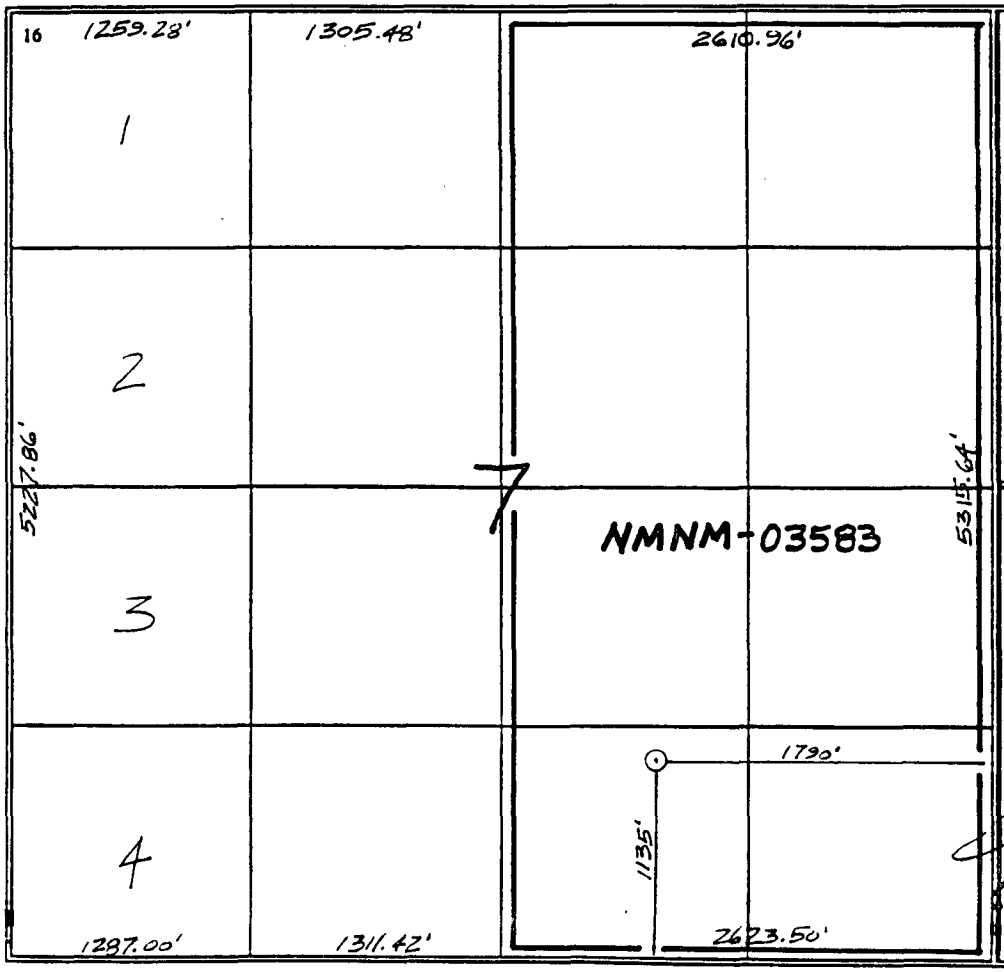
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
O	7	27 N	6 W		1135	South	1790	East	R.A.

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

12 Dedicated Acres	13 Joint or Infill	14 Consolidation Code	15 Order No.
320/320	I		

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief

Signature

Peggy Bradfield
Printed Name

Regulatory Representative
Title

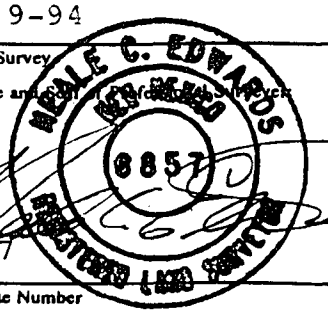
Date

18 SURVEYOR CERTIFICATION

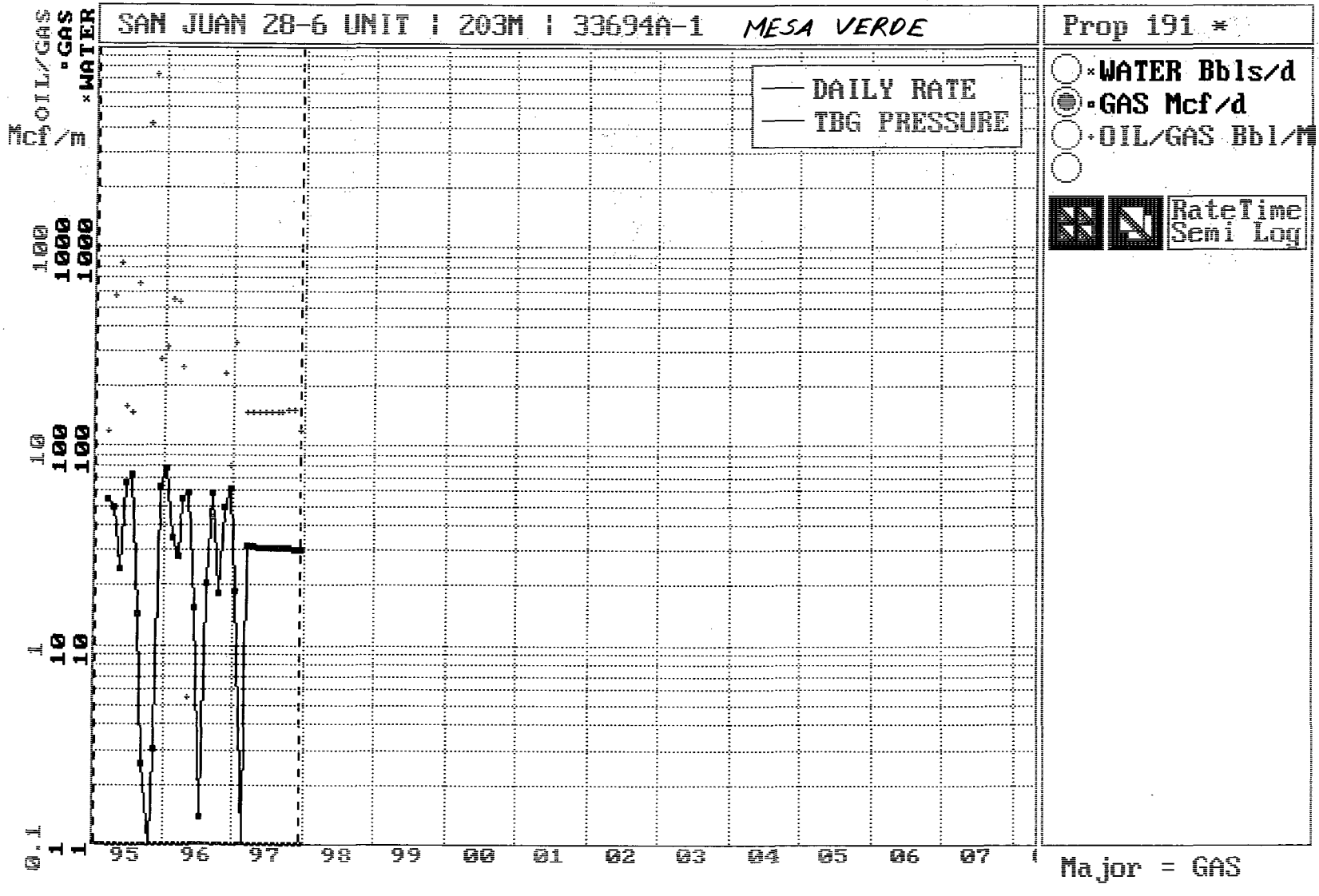
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

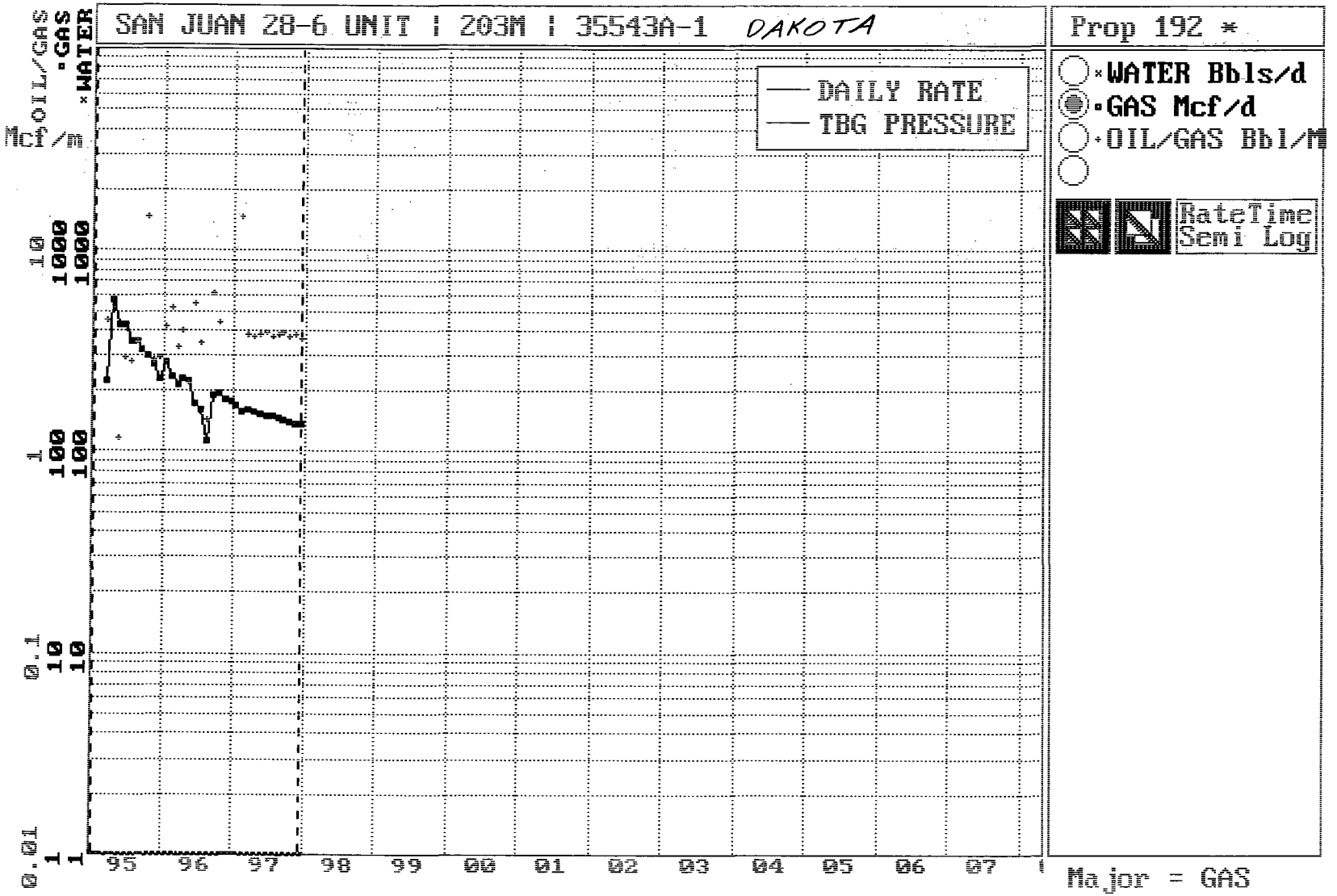
5-19-94
Date of Survey

Signature and Seal of Professional Surveyor:



6857
Certificate Number


SAN JUAN 28-6 UNIT | 203M | 33694A-1 MESA VERDE
Prop 191 *
DAILY RATE
TBG PRESSURE
×WATER Bbls/d
▪GAS Mcf/d
·OIL/GAS Bbl/M
RateTime
Semi Log
Mcf/m OIL/GAS ▪GAS ×WATER
0.1 1 10 100 1000
1 10 100 1000
95 96 97 98 99 00 01 02 03 04 05 06 07
Major = GAS


SAN JUAN 28-6 UNIT | 203M | 35543A-1 DAKOTA
Prop 192 *
DAILY RATE
TBG PRESSURE
×WATER Bbls/d
▪GAS Mcf/d
·OIL/GAS Bbl/M
RateTime
Semi Log
OIL/GAS ·GAS ×WATER
Mcf/m
95 96 97 98 99 00 01 02 03 04 05 06 07
Major = GAS

Package Preparation
Volume Data

DPNo: 33694A | SAN JUAN 28-6 UNIT | 203M | Form: MV

Supt: 60 KEN RAYBON | FF: 339 WARD ARNOLD | MS: 307 SHELDON MONTOYA
Pipeline: EPNG | Plunger: No | Dual: Yes | Compressor: No

Ownership (No Trust)

	Gas	Oil
GWI:	37.1949%	37.1949%
GNI:	29.3156%	29.3156%

Volumes (Days On)	MCFD	BOPD
7 Day Avg	12	0.0
30 Day Avg	27	0.0
60 Day Avg	19	0.0
3 Mo Avg	27	0.0
6 Mo Avg	40	0.0
12 MoAvg	29	0.1

Volumes (Days in Month)	MCFD	BOPD
30 Day Avg	26	0.0
60 Day Avg	15	0.0
3 Mo Avg	24	0.0
6 Mo Avg	32	0.0
12 Mo Avg	24	0.1

	Prior Year			Current Year		
	MCF/M	BOPM	Days On	MCF/M	BOPM	Days On
Jan	552	0.0	31	170	0.0	21.1
Feb	0	0.0	28	0	0.0	27.5
Mar	0	0.0	31	0	0.0	0
Apr	0	0.0	30	0	0.0	0
May	1,353	0.0	31	0	0.0	0
Jun	860	0.0	19.9	0	0.0	0
Jul	738	19.0	17	0	0.0	0
Aug	1,372	0.0	31	0	0.0	0
Sept	1,206	0.0	30	0	0.0	0
Oct	1,075	0.0	2.1	0	0.0	0
Nov	1,035	0.0	29.5	0	0.0	0
Dec	974	0.0	31	0	0.0	0
Total	9,165	19.0		170	0.0	

Print Form

Exit Volumes Data

4/8/1998

Package Preparation
Volume Data

DPNo: 35543A SAN JUAN 28-6 UNIT 203M Form: DK

Supt: 60 KEN RAYBON FF: 339 WARD ARNOLD MS: 307 SHELDON MONTOYA
Pipeline: EPNG Plunger: No Dual: Yes Compressor: No

Ownership (No Trust)

	Gas	Oil
GWI:	56.5619%	56.5619%
GNI:	46.1381%	46.1381%

Volumes (Days On)	MCFD	BOPD
7 Day Avg	147	7.9
30 Day Avg	131	0.8
60 Day Avg	132	0.6
3 Mo Avg	136	0.3
6 Mo Avg	146	0.5
12 MoAvg	156	0.8

Volumes (Days in Month)	MCFD	BOPD
30 Day Avg	131	0.8
60 Day Avg	132	0.6
3 Mo Avg	136	0.3
6 Mo Avg	145	0.5
12 Mo Avg	151	0.7

	Prior Year			Current Year		
	MCF/M	BOPM	Days On	MCF/M	BOPM	Days On
Jan	5,304	0.0	31	4,090	14.0	31
Feb	4,899	49.0	28	0	0.0	28
Mar	5,127	0.0	31	0	0.0	0
Apr	4,860	54.0	30	0	0.0	0
May	4,836	11.0	31	0	0.0	0
Jun	3,934	60.0	21.9	0	0.0	0
Jul	5,017	16.0	31	0	0.0	0
Aug	4,834	12.0	31	0	0.0	0
Sept	4,327	6.0	30	0	0.0	0
Oct	4,746	39.0	27.8	0	0.0	0
Nov	4,142	8.0	30	0	0.0	0
Dec	4,249	4.0	31	0	0.0	0
Total	56,275	259.0		4,090	14.0	

Print Form

Exit Volumes Data

4/8/1998

San Juan 28-6 Unit No. 203M
Bottom Hole Pressures
Flowing and Static BHP
Cullender and Smith Method
Version 1.0 3/13/94

Mesa Verde

MV - Current

GAS GRAVITY	0.731
COND. OR MISC. (C/M)	M
%N2	0.42
%CO2	0.65
%H2S	0
DIAMETER (IN)	6.366
DEPTH (FT)	5304
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	139
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	343
BOTTOMHOLE PRESSURE (PSIA)	394.4

MV - Original

GAS GRAVITY	0.731
COND. OR MISC. (C/M)	M
%N2	0.42
%CO2	0.65
%H2S	0
DIAMETER (IN)	6.366
DEPTH (FT)	5304
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	139
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1088
BOTTOMHOLE PRESSURE (PSIA)	1282.1

Dakota

DK-Current

GAS GRAVITY	0.703
COND. OR MISC. (C/M)	M
%N2	0.43
%CO2	0.99
%H2S	0
DIAMETER (IN)	4
DEPTH (FT)	7556
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	178
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	650
BOTTOMHOLE PRESSURE (PSIA)	788.7

DK-Original

GAS GRAVITY	0.703
COND. OR MISC. (C/M)	M
%N2	0.43
%CO2	0.99
%H2S	0
DIAMETER (IN)	4
DEPTH (FT)	7556
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	178
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	2728
BOTTOMHOLE PRESSURE (PSIA)	3395.6

Page No.: 1
Print Time: Fri May 08 14:25:10 1998
Property ID: 1693 Immediate Offset to San Juan 28-6 #203 M
Property Name: SAN JUAN 28-6 UNIT | 103 | 50502A-1 DAKOTA
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE--	---CUM_GAS-- Mcf	M_SIWHP Psi	
09/06/61	0	2716.0	Initial
10/25/61	0	2715.0	
02/13/62	43000	1868.0	
07/18/63	179000	1498.0	
09/14/64	321000	1127.0	
09/01/65	427000	942.0	
02/24/66	470000	985.0	
03/07/67	559000	904.0	
05/27/68	649000	887.0	
12/28/70	836411	757.0	
07/07/71	875610	764.0	
05/30/72	928852	704.0	
05/09/73	981209	731.0	
05/23/75	1081947	765.0	
05/12/77	1191982	654.0	
06/25/79	1288926	715.0	
06/10/81	1396583	634.0	
06/02/83	1479342	709.0	
11/05/85	1586318	658.0	
08/04/88	1667071	771.0	
07/28/92	1783558	684.0	
04/01/98	1960881	638	Current Based on Pressure vs. Cum. Gas Plot

Page No.: 1
Print Time: Fri May 08 14:25:27 1998
Property ID: 1879 *Immediate offset to San Juan 28-6 #203M*
Property Name: SAN JUAN 28-6 UNIT | 54 | 49604A-1 *Mesa Verde*
Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE--	---CUM_GAS-- Mcf	M_SIWHP Psi	
05/23/56	0	1076.0	*Initial*
06/05/56	0	1075.0	
12/07/56	63000	972.0	
11/23/57	336000	852.0	
10/14/58	548000	776.0	
03/14/59	599000	797.0	
08/29/60	890000	702.0	
02/13/62	1066000	705.0	
08/08/62	1117000	656.0	
03/04/63	1130000	692.0	
02/19/64	1209000	662.0	
03/01/65	1310000	631.0	
02/24/66	1390000	612.0	
03/07/67	1448000	596.0	
09/16/68	1516000	571.0	
10/16/70	1624523	528.0	
07/07/71	1672085	502.0	
05/30/72	1732932	467.0	
05/09/73	1806540	437.0	
07/23/74	1880374	444.0	
05/10/78	2011104	390.0	
06/10/80	2135935	371.0	
05/10/82	2191756	391.0	
05/31/93	2274690	406.0	
04/01/98	*2388676*	*331*	*Current based on Pressure vs. Cum Gas Plot*

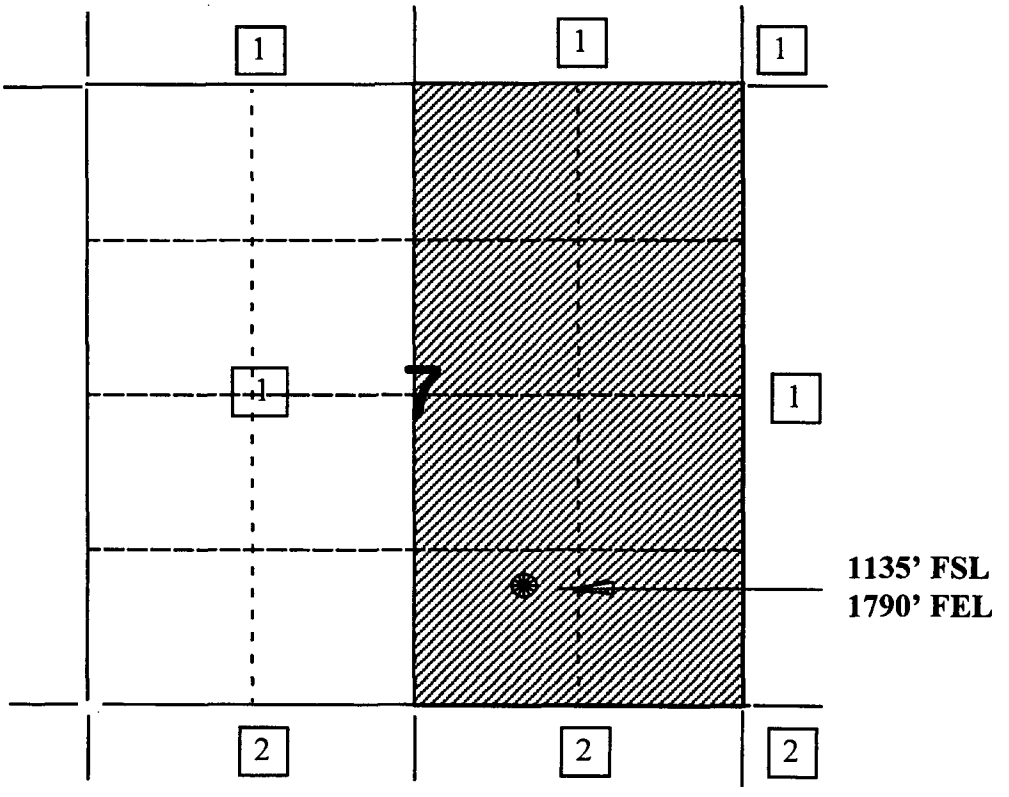
BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-6 Unit #203M

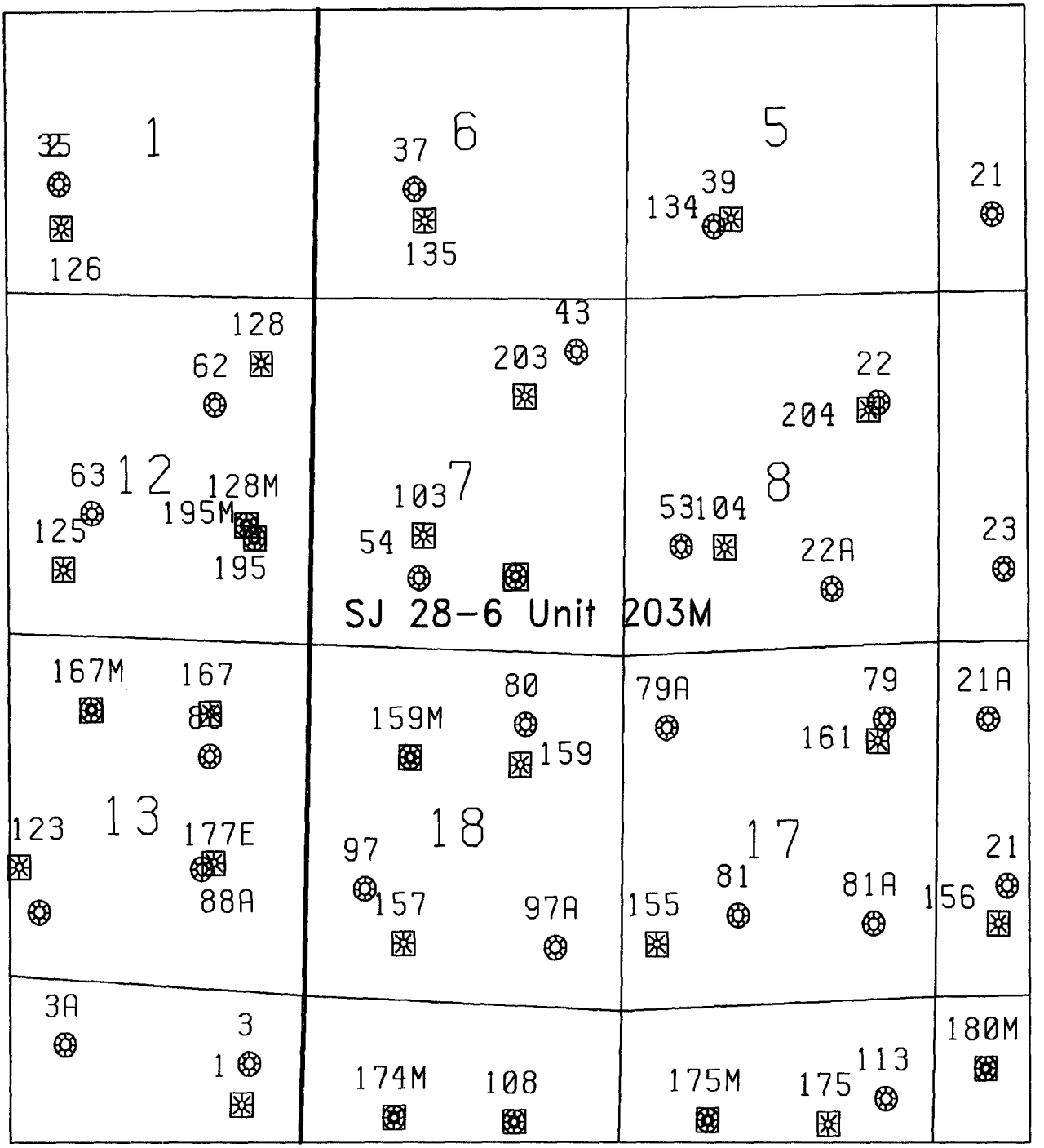
OFFSET OPERATOR/OWNER PLAT

Mesaverde / Dakota Formations Commingle Well

Township 27 North, Range 6 West



1) Burlington Resources
2) Union Oil Company of California
   SW Region Joint Venture Operations
   P.O. Box 3100
   Midland, TX 79702



PLH 4/28/98

SJ 28-6 Unit 203M

Sec. 7, T27N, R6W

Mesaverde/Dakota

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:

CASE NO. 11628
ORDER NO. R-10696

APPLICATION OF BURLINGTON RESOURCES OIL & GAS COMPANY FOR THE ESTABLISHMENT OF A DOWNHOLE COMMINGLING "REFERENCE CASE" FOR ITS SAN JUAN 28-6 UNIT PURSUANT TO DIVISION RULE 303.E. AND THE ADOPTION OF SPECIAL ADMINISTRATIVE RULES THEREFOR, SAN JUAN COUNTY, NEW MEXICO..

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on October 17 and November 7, 1996, at Santa Fe, New Mexico, before Examiners David R. Catanach and Michael E. Stogner, respectively.

NOW, on this 12th day of November, 1996, the Division Director, having considered the testimony, the record and the recommendations of the Examiner, and being fully advised in the premises,

FINDS THAT:

(1) Due public notice having been given as required by law, the Division has jurisdiction of this cause and the subject matter thereof.

(2) The applicant, Burlington Resources Oil & Gas Company (Burlington), pursuant to the provisions of Division Rule 303.E., seeks to establish a downhole commingling "reference case" to provide exceptions for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 28-6 Unit, San Juan County, New Mexico.

(3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

"If sufficient data exists on a lease, pool, formation, geographic area, etc., so as to render it unnecessary to repeatedly provide such data on Form C-107-A, an operator may except any of the various criteria required under Paragraph 303.D. of this rule by establishing a "reference case". The Division, upon its own motion, or by application from an operator, may establish "reference cases" either administratively or by hearing. Upon Division approval of such "reference cases" for specific criteria, subsequent applications to downhole commingle (Form C-107-A) will be required only to cite the Division order number which established such exceptions and shall not be required to submit data for those criteria."

(4) The applicant is the current operator of the San Juan 28-6 Unit which encompasses some 27,735 acres in Townships 27 and 28 North, Range 6 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 28-6 Unit, the applicant currently operates ninety (90) Basin-Dakota Gas Pool wells, one hundred twenty-six (126) Blanco-Mesaverde Gas Pool wells, fifty-one (51) South Blanco-Pictured Cliffs Gas Pool wells, and fifty-eight (58) Basin-Fruitland Coal Gas Pool wells.

(6) According to its evidence and testimony, Burlington seeks to:

a) establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations whereby these formations and/or pools may be identified as "marginal" on Form C-107-A's subsequently filed for wells within the San Juan 28-6 Unit. The applicant further proposes that the data provided in the immediate case serve as supplemental data or confirmation that these formations and/or pools should be classified as "marginal";

b) establish a "reference case" for pressure criteria in the Dakota and Pictured Cliffs formations whereby the Division may utilize data provided in the immediate case to verify the pressure data provided on Form C-107-A's subsequently filed for wells within the San Juan 28-6 Unit;

c) establish a "reference case" whereby the Division utilizes the data presented in the immediate case to endorse or approve certain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a certain method of allocating production on Form C-107-A's subsequently filed for wells within the San Juan 28-6 Unit; and,

d) establish a "reference case" or an administrative procedure for authorizing the downhole commingling of existing or future drilled wells within the San Juan 28-6 Unit without additional notice to each affected interest owner as required by Division Rule No. 303.D.

(7) In support of its request to except marginal economic criteria, the applicant presented geologic and engineering evidence and testimony which indicates that within the San Juan 28-6 Unit:

a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent;

b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 449 MMCFG and 186 MMCFG, respectively;

c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 254 MCFGD and 216 MCFGD, respectively; and,

d) the estimated ultimate gas recoveries and initial producing rates from the Dakota and Pictured Cliffs formations are insufficient to justify drilling stand alone wells and/or dually completed wells to recover such gas reserves.

(8) The evidence and testimony presented by the applicant indicates that the Dakota and Pictured Cliffs formations within the San Juan 28-6 Unit should be properly classified as "marginal".

(9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 28-6 Unit, the applicant presented engineering evidence and testimony which indicates that:

a) the average shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations at the time of initial development was approximately 3,172 psi and 1,173 psi, respectively; and,

b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations is approximately 980 psi and 393 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 28-6 Unit so as to except pressure criteria as proposed by the applicant.

(11) The applicant testified that various allocation methods will be utilized for downhole commingled wells within the San Juan 28-6 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:

a) the subtraction method will likely be utilized in those instances involving the Basin-Fruitland Coal Gas Pool and in those instances where a zone with a well established decline rate is commingled with a newly completed zone;

b) a fixed allocation formula will be utilized in those instances where production history for both zones is available, or in those instances where newly completed zones are tested and stabilized flow rates obtained.

(12) The allocation methods proposed by the applicant are routinely utilized by industry and approved by the Division and therefore, the proposal to except allocation formulas should be approved.

(13) In support of its request to establish a "reference case" or administrative procedure for providing notice within the San Juan 28-6 Unit the applicant presented evidence and testimony which indicates that:

a) the interest ownership between two zones within a given wellbore in the San Juan 28-6 Unit is generally not common;

b) pursuant to Division Rule No. 303.D., applicant is currently required to notify all interest owners within the San Juan 28-6 Unit every time a Form C-107-A is submitted to the Division. There are a considerable number of such interest owners within the unit;

c) providing notice to each interest owner within the San Juan 28-6 Unit of subsequent downhole comminglings is unnecessary and is an excessive burden on the applicant;

d) the downhole commingling of wells within the San Juan 28-6 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-6 Unit should not violate the correlative rights of any interest owner;

e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for notice.

(14) An administrative procedure should be established within the San Juan 28-6 Unit for obtaining approval for subsequent downhole commingled wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are complied with.

(15) Approval of the proposed "reference cases" for marginal economic criteria, pressure criteria, allocation formulas and notice will lessen the burden on the applicant insofar as providing the data required pursuant to Division Rule No. 303.D. and Form C-107-A, will provide the applicant a streamlined method for obtaining downhole commingling approvals within the San Juan 28-6 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Burlington Resources Oil & Gas Company to establish a "reference case" for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 28-6 Unit, San Juan County, New Mexico, is hereby approved.

(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 28-6 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify the Pictured Cliffs and Dakota pressure information provided, and support or justification for utilizing a given method or formula for allocation of production, provided however, in the event any of the data described above appearing on Form C-107-A appears to be beyond the data range provided in this case, the Division may require the submittal of additional supporting data.

(3) In order to obtain Division authorization to downhole commingle wells within the San Juan 28-6 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Aztec Offices of the Division. Such application shall contain all the information required under Rule No. 303.C. of the Division Rules and Regulations, provided however that the applicant shall not be required to provide notice to all interest owners within the San Juan 28-6 Unit of such proposed commingling.

(4) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LeMAY
Director

S E A L