

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 2040 South Pacheco, Santa Fe, NM 87505



2188

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]

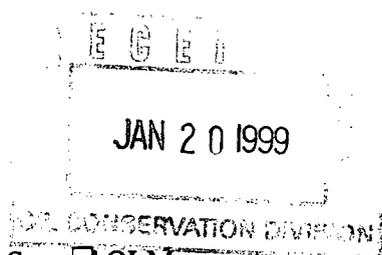
[1] TYPE OF APPLICATION - Check Those Which Apply for [A]

- [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.

[Handwritten Signature]

Print or Type Name

Signature

Title

Date

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

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

APPROVAL PROCESS :

X Administrative Hearing

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE

X YES NO

Burlington Resources Oil & Gas Company

PO Box 4289, Farmington, NM 87499

Operator

Address

SAN JUAN 27-5 UNIT

165M

C-29-27N-05W

Rio Arriba

Lease

Well No.

Unit Ltr. - Sec - Twp - Rge

County Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7454 API NO. 30-39-2390300 Federal X State (and/or) Fee

Table with 4 columns: The following facts are submitted in support of downhole commingling, Upper Zone, Intermediate Zone, Lower Zone. Rows include Pool Name and Pool Code, Top and Bottom of Pay Section, Type of production, Method of Production, Bottomhole Pressure, Oil Gravity, Producing or Shut-In?, Production Marginal?, and Fixed Percentage Allocation.

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-10694

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 Jennifer L. Dobson TITLE Production Engineer DATE 01-18-99

TYPE OR PRINT NAME Jennifer L. Dobson TELEPHONE NO. (505) 599-4026

NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102
Supersedes
Effective 1-

All distances must be from the outer boundaries of the Section.

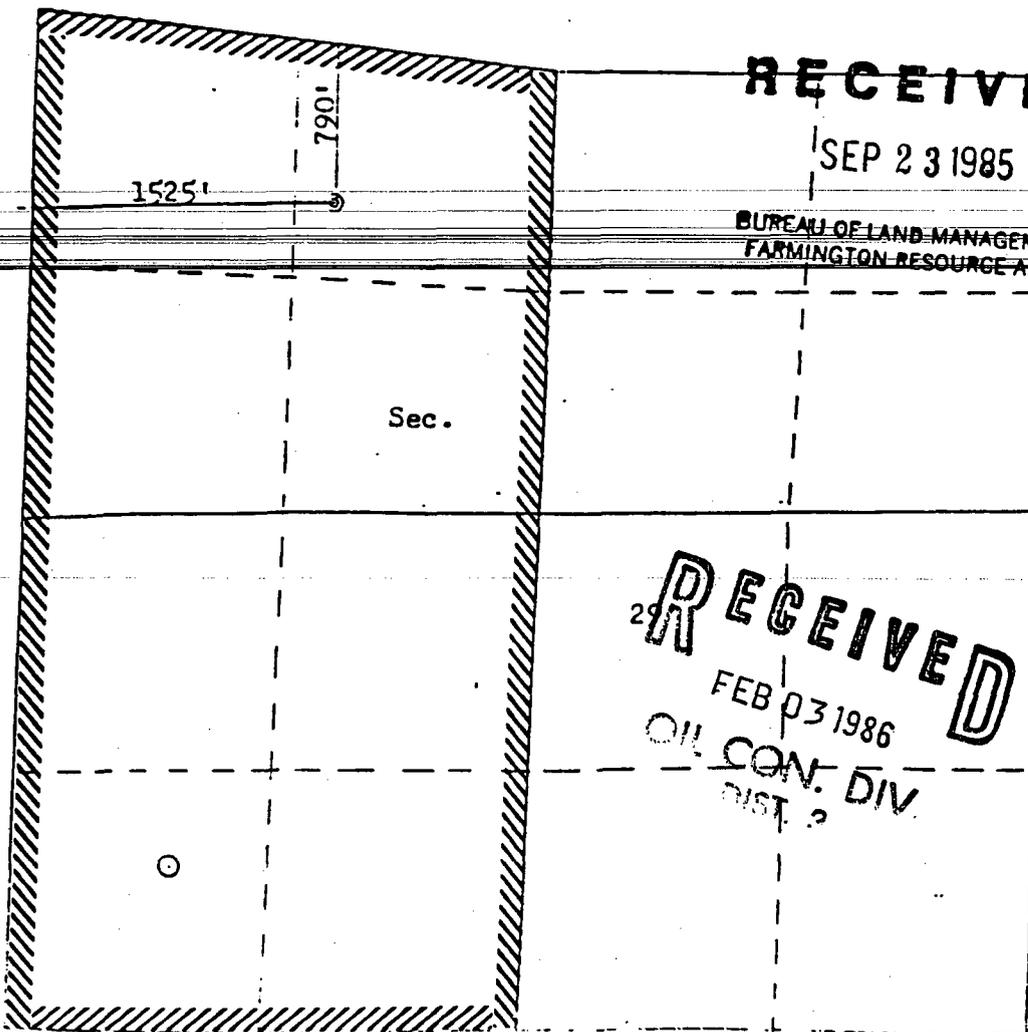
Operator EL PASO NATURAL GAS COMPANY		Lease SAN JUAN 27-5 UNIT (SF 079392)		Well No. 165M
Unit Letter C	Section 29	Township 27N	Range 5W	County Rio Arriba
Actual Footage Location of Well: 790 feet from the North line and 1525 feet from the West line				
Ground Level Elev: 6544	Producing Formation Dakota/Mesa Verde	Pool Basin/Blanco	Dedicated Acreage: 316.31 Acre	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to work interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

Yes No If answer is "yes," type of consolidation Unitization

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side this form if necessary.)

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. Note: Plat reissued to show addition of Mesa Verde formation. 9-18-8.



Scale: 1" = 100'

CERTIFICATION

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

Deagan Dool

Name
Drilling Clerk

Position
El Paso Natural Gas

Company
9-20-85

Date

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

Date Surveyed
September 10, 1985

Registered Professional Engineer and Land Surveyor

Fred B. Kerr Jr.
Fred B. Kerr Jr.

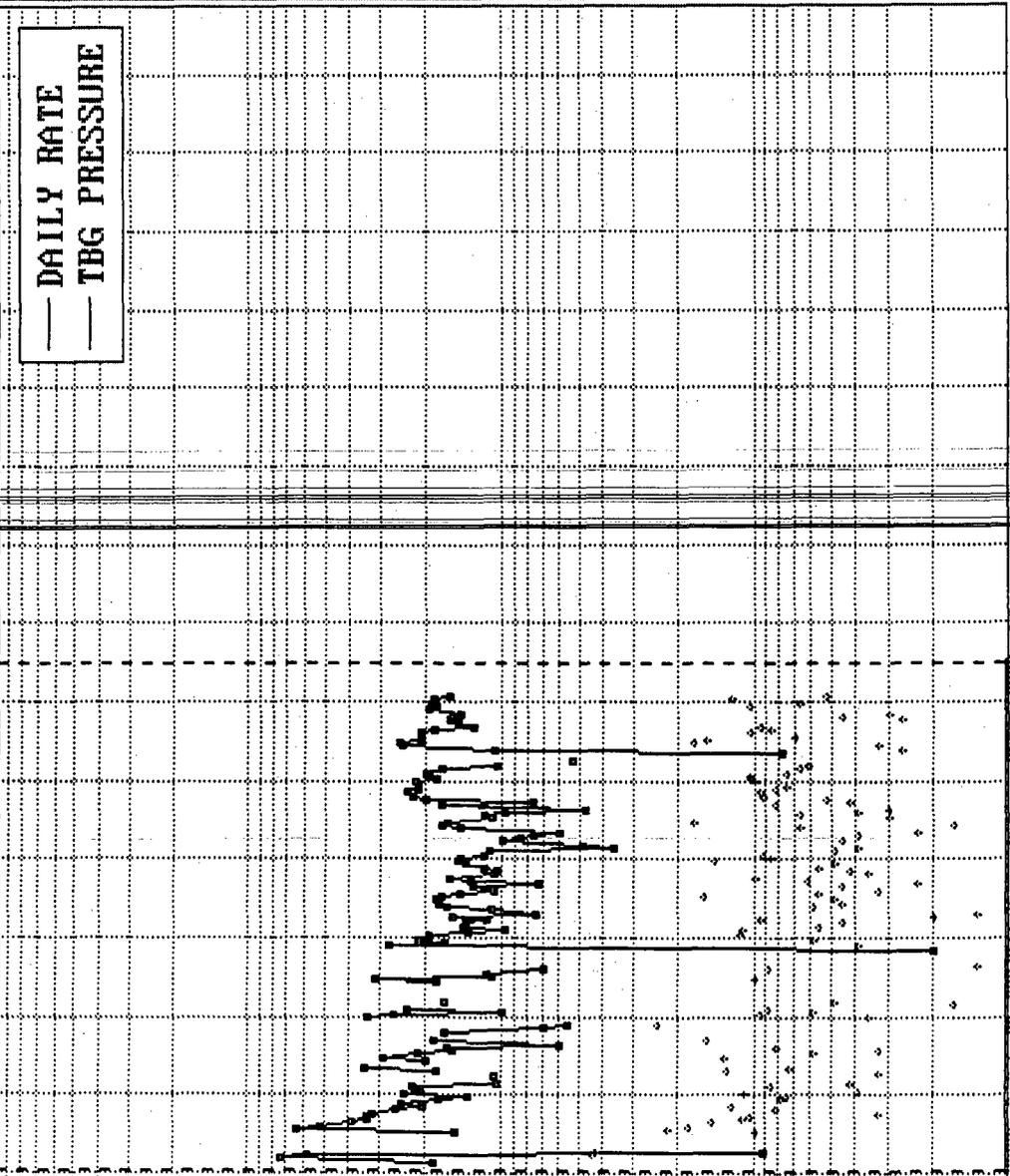
Prop 1388 *

- * WATER Bbls/d
 - GAS Mcf/d
 - WATER/GAS
 - OIL Bbl/d
-  Rate Time
 Semi Log

SAN JUAN 27-5 UNIT : 165M : 54423A-1-Mesaverde

— DAILY RATE
 — TBG PRESSURE

* OIL 100
 * WATER/GAS 1000
 * GAS 1000
 * WATER 1000



Major = GAS

FARMINGTON

1998 MONTHLY PRODUCTION FOR 54423A

PHS030M1

SAN JUAN 27-5 UNIT 165M

BLANCO MESAVERDE (PRORATED GAS FIELD

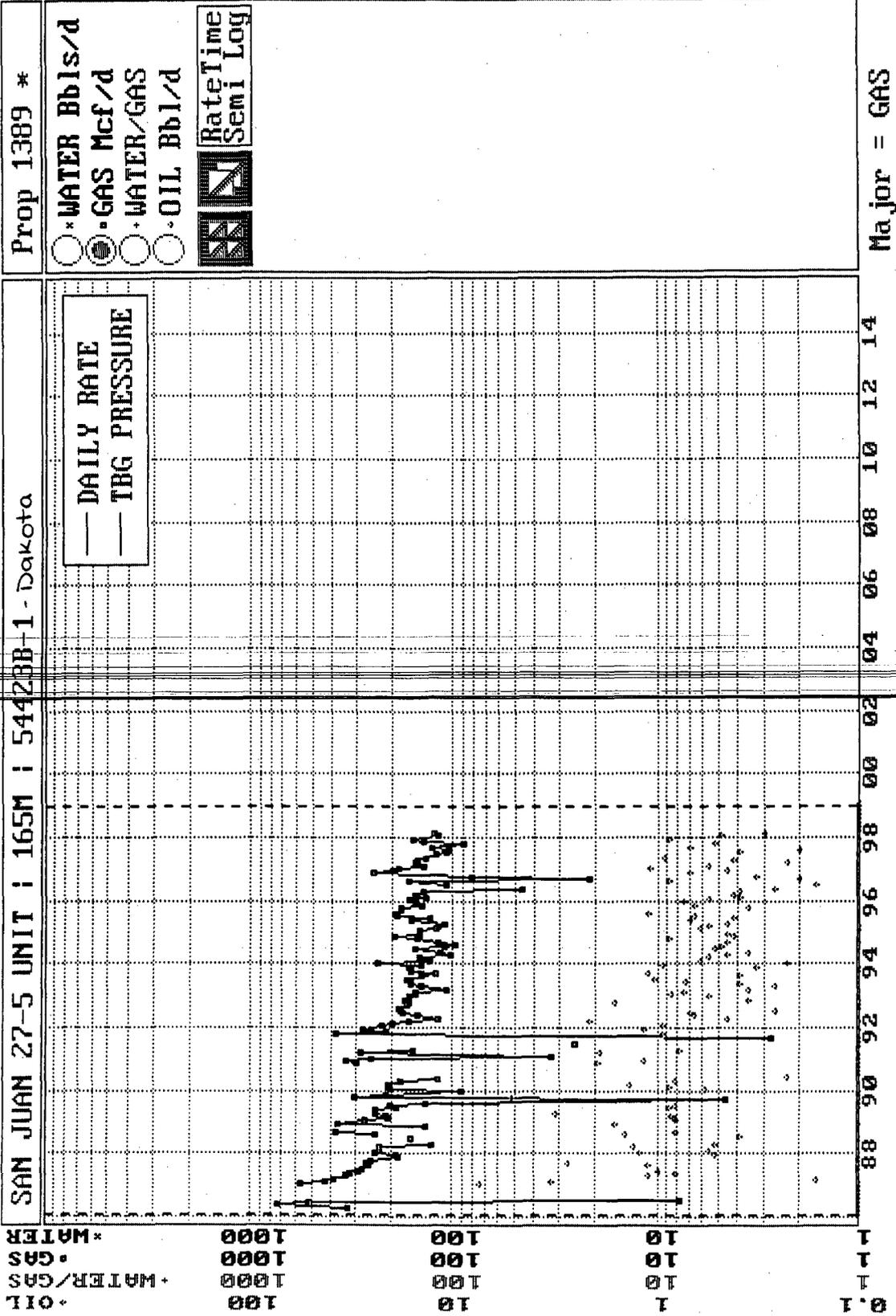
MESAVERDE ZONE

DAYS			OIL			GAS							
MO	T	S	ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER PROD	C
1	2	F	31	02	37		01	5736	31	1173	15.025		
2	2	F	28	02	16		01	4960	28	1173	15.025		
3	2	F	31	02	5		01	5305	31	1173	15.025		
4	2	F	30	02	16	60.2	01	5268	30	1173	15.025		
5	2	F	28	02	16		01	4027	28	1173	15.025		
6	2	F	30	02	24		01	4068	30	1223	15.025		
7	2	F	31	02	16		01	4935	31	1223	15.025		
8	2	F	31	02	12		01	4480	31	1223	15.025		
9	2	F	30	02	14		01	4672	30	1223	15.025		
10	2	F	31	02	14		01	5325	31	1223	15.025		
11													
12													

PF6 - RETURNS TO ANNUAL DISPLAY
 PF10 - HELP INFORMATION

PF3 - TRANSFER TO UPDATE
 PF9 - DISPLAY MONTHLY INJECTION
 PRS 12/05/98

00/00/00 00:00:00:0



FARMINGTON

1998 MONTHLY PRODUCTION FOR 54423B

PHS030M1

SAN JUAN 27-5 UNIT 165M

BASIN DAKOTA (PRORATED GAS) FIELD

DAKOTA ZONE

DAYS			OIL			GAS								
MO	T	S	ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER	PROD	C
1	2	F	31	02	15		01	3630	31	1079	15.025			
2	2	F	28	02	9		01	3798	28	1079	15.025			
3	2	F	31	02	12		01	4027	31	1079	15.025			
4	2	F	30	02	19	58.4	01	3562	30	1079	15.025			
5	2	F	29	02	7		01	3873	29	1079	15.025			
6	2	F	30	02	9		01	3304	30	1102	15.025			
7	2	F	31	02	15		01	3284	31	1102	15.025			
8	2	F	31	02	9		01	4369	31	1102	15.025			
9	2	F	30	02	3		01	4202	30	1102	15.025			
10	2	F	31	02	8		01	4427	31	1102	15.025			
11														
12														

PF6 - RETURNS TO ANNUAL DISPLAY

PF3 - TRANSFER TO UPDATE

PF10 - HELP INFORMATION

PF9 - DISPLAY MONTHLY INJECTION

00/00/00 00:00:00:0

PRS 12/05/98



San Juan 27-5 Unit #165M
 Bottom Hole Pressures
 Flowing and Static BHP
 Cullender and Smith Method
 Version 1.0 3/13/94

Mesaverde		Dakota	
<u>MV - Current</u>		<u>DK-Current</u>	
GAS GRAVITY	0.719	GAS GRAVITY	0.645
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.23	%N2	0.16
%CO2	0.84	%CO2	1.25
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	5415	DEPTH (FT)	7601
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	130	BOTTOMHOLE TEMPERATURE (DEG F)	185
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	490	SURFACE PRESSURE (PSIA)	610
BOTTOMHOLE PRESSURE (PSIA)	566.4	BOTTOMHOLE PRESSURE (PSIA)	724.8
<u>MV - Original</u>		<u>DK-Original</u>	
GAS GRAVITY	0.719	GAS GRAVITY	0.645
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.23	%N2	0.16
%CO2	0.84	%CO2	1.25
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	5415	DEPTH (FT)	7601
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	130	BOTTOMHOLE TEMPERATURE (DEG F)	185
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	885	SURFACE PRESSURE (PSIA)	2164
BOTTOMHOLE PRESSURE (PSIA)	1035.1	BOTTOMHOLE PRESSURE (PSIA)	2630.3

Page No.: 2

Print Time: Wed Dec 30 14:30:40 1998

Property ID: 1389

Property Name: SAN JUAN 27-5 UNIT | 165M | 54423B-1 - *Dakota*

Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE-- ---CUM GAS-- M SIWHP
.....Mcf.....Psi.....

01/23/86	0	2164.0	<i>-original</i>
07/04/86	48579	1284.0	
08/12/87	136419	784.0	
06/28/88	194234	1017.0	
04/22/90	324403	476.0	
06/18/93	494106	610.0	<i>-current</i>

DATE: January 04, 1999
 NAME: SAN JUAN 27-5 UNIT 16SA
 FMT: MESAVERDE
 LOCATION
 UNIT: C
 SEC: 29
 TWN: 27N
 RNG: 05W

LEGEND
 FIRST DELIVERY DATA
 WELL NAME
 MCF/D-CUM(MMCF)
 BOPD-CUM(MBO)

<p>10/85 San Juan 27-5 Unit 34A 174/841 (98) 1/6</p> <p>7/67 San Juan 27-5 Unit 34 104/2622 (98) 0/10</p> <p>2/86 San Juan 27-5 Unit 97M 78/434 (98) 0/1</p>	<p>3/60 San Juan 27-5 Unit 50 58/528 (98) 0/0</p> <p>[19] 3/59 San Juan 27-5 Unit 48 240/1041 (98) 0/0</p> <p>12/55 San Juan 27-5 Unit 13 225/675 (98) 1/1</p> <p>9/56 San Juan 27-5 Unit 17 217/3697 (98) 0/10</p> <p>8/61 San Juan 27-5 Unit 67 115/2987 (98) 0/10</p> <p>12/62 San Juan 27-5 Unit 54 78/1801 (98) 0/4</p>	<p>3/86 San Juan 27-5 Unit 139M 194/314 (98) 1/1</p> <p>[20] 2/57 San Juan 27-5 Unit 19 78/1314 (98) 0/0</p> <p>4/86 San Juan 27-5 Unit 16AM 159/689 (98) 0/2</p> <p>1/81 San Juan 27-5 Unit 8A 76/509 (98) 0/1</p> <p>12/54 San Juan 27-5 Unit 8 87/2954 (98) 0/7</p>	<p>3/58 San Juan 27-5 Unit 37 63/897 (98) 0/0</p> <p>9/53 San Juan 27-5 Unit 4 201/956 (98) 0/0</p> <p>6/98 San Juan 27-5 Unit 140M 426/38 (98) 1/0</p> <p>4/57 San Juan 27-5 Unit 24 102/2083 (98) 0/5</p> <p>9/81 San Juan 27-5 Unit 24A 79/594 (98) 0/2</p>	<p>4/58 San Juan 27-5 Unit 30 145/616 (98) 0/0</p> <p>[21] 3/59 San Juan 27-5 Unit 41 104/477 (98) 0/0</p> <p>9/62 San Juan 27-5 Unit 71 67/802 (98) 0/1</p> <p>[28] 4/60 San Juan 27-5 Unit 51 49/612 (98) 0/0</p> <p>8/61 San Juan 27-5 Unit 68 57/774 (98) 0/0</p> <p>9/81 San Juan 27-5 Unit 35A 221/1304 (98) 0/6 [33]</p> <p>6/58 San Juan 27-5 Unit 35 45/531 (98) 0/0</p> <p>8/61 San Juan 27-5 Unit 68A 169/685 (98) 0/3</p>
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T
27
N

R-05-W

DATE: January 05, 1999
 NAME: SAN JUAN 27-5 UNIT 165M
 FMT: DAKOTA
 LOCATION C
 UNIT: 29
 SEC: 27N
 TWN: 05W
 RNG: 05W

LEGEND
 FIRST DELIVERY DATA
 WELL NAME
 MCF/D-CUM(MMCF)
 BOPD-CUM(MBO)

<p>9/71 San Juan 27-5 Unit 133 204/3063 (99) 0/4</p> <p>4/72 San Juan 27-5 Unit 138 69/1977 (99) [19] 0/3</p> <p>INA 3/86 San Juan 27-5 Unit 138E 0/879 (99) 0/1</p>	<p>3/86 San Juan 27-5 Unit 139M 169/791 (99) 0/2</p> <p>4/72 San Juan 27-5 Unit 139 128/1613 (99) 0/5</p>	<p>8/71 San Juan 27-5 Unit 131 140/1421 (99) 0/4</p> <p>[20] 4/72 San Juan 27-5 Unit 135 128/1613 (99) 0/5</p>	<p>7/71 San Juan 27-5 Unit 122 148/1500 (99) 0/8</p> <p>[21] 7/71 San Juan 27-5 Unit 125 San Juan 27-5 Unit 125E 170/1521 (99) 0/5</p> <p>4/86 165/814 (99) 1/4</p>
<p>9/73 San Juan 27-5 Unit 164 87/1237 (99) 0/3</p> <p>[30] 4/72 San Juan 27-5 Unit 141 217/2794 (99) 0/4</p> <p>5/98 1187 (99) 1/0 San Juan 27-5 Unit 164M</p>	<p>4/86 San Juan 27-5 Unit 155M 123/749 (99) 0/2</p> <p>9/73 San Juan 27-5 Unit 165 155/1736 (99) 0.7/8</p>	<p>4/72 San Juan 27-5 Unit 140 152/1571 (99) 0/6</p> <p>[23] 6/98 San Juan 27-5 Unit 140M 191/17 (99) 1/0</p>	<p>4/71 San Juan 27-5 Unit 124 107/1497 (99) 0/5</p> <p>[28] 4/70 San Juan 27-5 Unit 121 118/1466 (99) 0/2</p>
<p>2/86 San Juan 27-5 Unit 97M 114/858 (99) 0/2</p> <p>[31] 7/65 San Juan 27-5 Unit 97 70/1457 (99) 0/5</p>	<p>11/73 San Juan 27-5 Unit 167 69/961 (99) 0/7</p>	<p>2/75 San Juan 27-5 Unit 189 57/887 (99) 0/6</p> <p>[33]</p>	<p>5/72 San Juan 27-5 Unit 142 103/1300 (99) 0/5</p> <p>[33]</p> <p>11/73 San Juan 27-5 Unit 169 68/830 (99) 0/5</p>

R-05-W

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. 11626
ORDER NO. R-10694

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 27-5 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 27-5 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 27-5 Unit which encompasses some 23,043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 27-5 Unit, the applicant currently operates one hundred and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and four (4) 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 27-5 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 27-5 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 27-5 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 27-5 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 27-5 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 583 MMCFG and 426 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 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 27-5 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 27-5 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 were approximately 3.141 psi and 1.118 psi, respectively; and.
 - b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1.032 psi and 441 psi, respectively.
- (10) There is sufficient pressure data available within the San Juan 27-5 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 27-5 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 27-5 Unit the applicant presents evidence and testimony which indicates that:
- a) the interest ownership between two zones within a given wellbore in the San Juan 27-5 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 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit;

- c) providing notice to each interest owner within the San Juan 27-5 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 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 27-5 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 27-5 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 27-5 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 Picured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County New Mexico, is hereby approved.

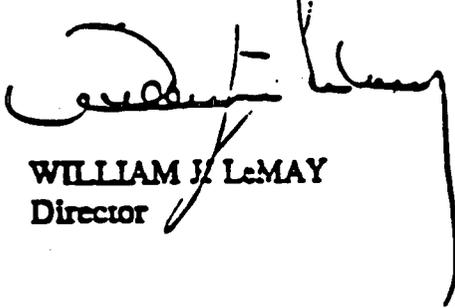
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Picured Cliffs and Dakota formations as "marginal", supporting data to verify the Picured 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 27-5 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 27-5 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