DATE IN 2/23/00	SUSPENSE 3/14/00	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

2681

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
FEB 23 2000
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.

Mark Stodola	Mark Stodola	Reservoir Engr.	2/18/00
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

APPLICATION FOR DOWNHOLE COMMINGLING

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

APPROVAL PROCESS:
X Administrative __Hearing

EXISTING WELLBORE
X YES __ NO

Phillips Petroleum Company — Operator
5525 Hwy. 64 Farmington, N.M. 87401 — Address

San Juan 29-6 Unit 31B — Lease
Well No.
Unit E, Section 10, T29N, R6W — Unit Ltr. - Sec - Twp - Rge
San Juan — County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 017654 Property Code 009257 API NO. 30-039-26197 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)	4422-5994		8020-8116
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	a. (Current) 750 psi. (est.)	a.	a. 853 psig. (24-hr. Shut-in)
	b. (Original) 1280 psi (est.)	b.	b. 3130 psi (est.)
6. Oil Gravity (°API) or Gas BTU Content	1200 Btu/Scf.		1020 Btu/scf.
7. Producing or Shut-In?			Producing
Production Marginal? (yes or no)			
• If Shut-In, give date 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: Rates:	Date: Rates:	Date: Rates:
• If Producing, give date andoil/gas/water rates of recent test (within 60 days)	Date: Rates: estimated will be 500 mcfd	Date: Rates:	Date: 1/30/00 Rates: 168 mcfd 20 bwpd
8. Fixed Percentage Allocation Formula -% for each zone	Oil: % Gas: %	Oil: % Gas: %	Oil: % Gas: %

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 ___ No
Have all offset operators been given written notice of the proposed downhole commingling? X Yes ___ No

11. Will cross-flow occur? ___ Yes X 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. ___ 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. ___Yes ___ No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-11187

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 Mark Stodola TITLE Reservoir Engineer DATE 2/18/00

TYPE OR PRINT NAME Mark Stodola TELEPHONE NO. (505) 599-3455

PHILLIPS PETROLEUM COMPANY
FARMINGTON, NEW MEXICO 87401
5525 HWY. 64 NBU 3004

February 21, 2000

New Mexico Oil & Gas Conservation Div.
2040 South Pacheco
Santa Fe, New Mexico 87505-6429

Downhole Commingling Allocation Method
on the San Juan 29-6 Unit #31B

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for approximately twelve months after actual commingling occurs. After the twelve month period, we will convert to the ratio method as indicated in our commingling application. We believe this will be a more accurate method of allocating production considering that the Basin Dakota interval has been producing for months and it will take several months for the Blanco Mesaverde production to stabilize.

Dakota Forecast

March 2000	3,204	April 2000	3,289
May 2000	3,267	June 2000	3,140
July 2000	3,224	August 2000	3,099
September 2000	3,182	October 2000	3,161
November 2000	2,837	December 2000	3,121
January 2001	3,001	February 2001	3,081

For example, if the total volume for March 2000 were 18,704 mcf, then the Dakota would be allocated 3,204 mcf and the Mesaverde 15,500 mcf. And subsequently, the Dakota would be allocated (3,204/18,704) or 17.13%, and Mesaverde would be allocated (15,500/18,704) or 82.87%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark Stodola

Mark W. Stodola
Reservoir Engineer

MS/pc

cc: OCD – Aztec
BLM- Farmington
NM Commissioner of Public Lands – Santa Fe
David Valdez - Burlington

District I
PO Box 1980, Hobbs, NM 88241-1980
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

RECEIVED
BLM
99 JUN -9 PM 2:50
070 FARMINGTON, NM

Form C-102
Revised October 18, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number	² Pool Code	³ Pool Name
	72319	Blanco Mesaverde

⁴ Property Code	⁵ Property Name	⁶ Well Number
009257	SAN JUAN 29-6	31B
⁷ OGRID No.	⁸ Operator Name	⁹ Elevation
017654	PHILLIPS PETROLEUM COMPANY	6766'

¹⁰ Surface Location

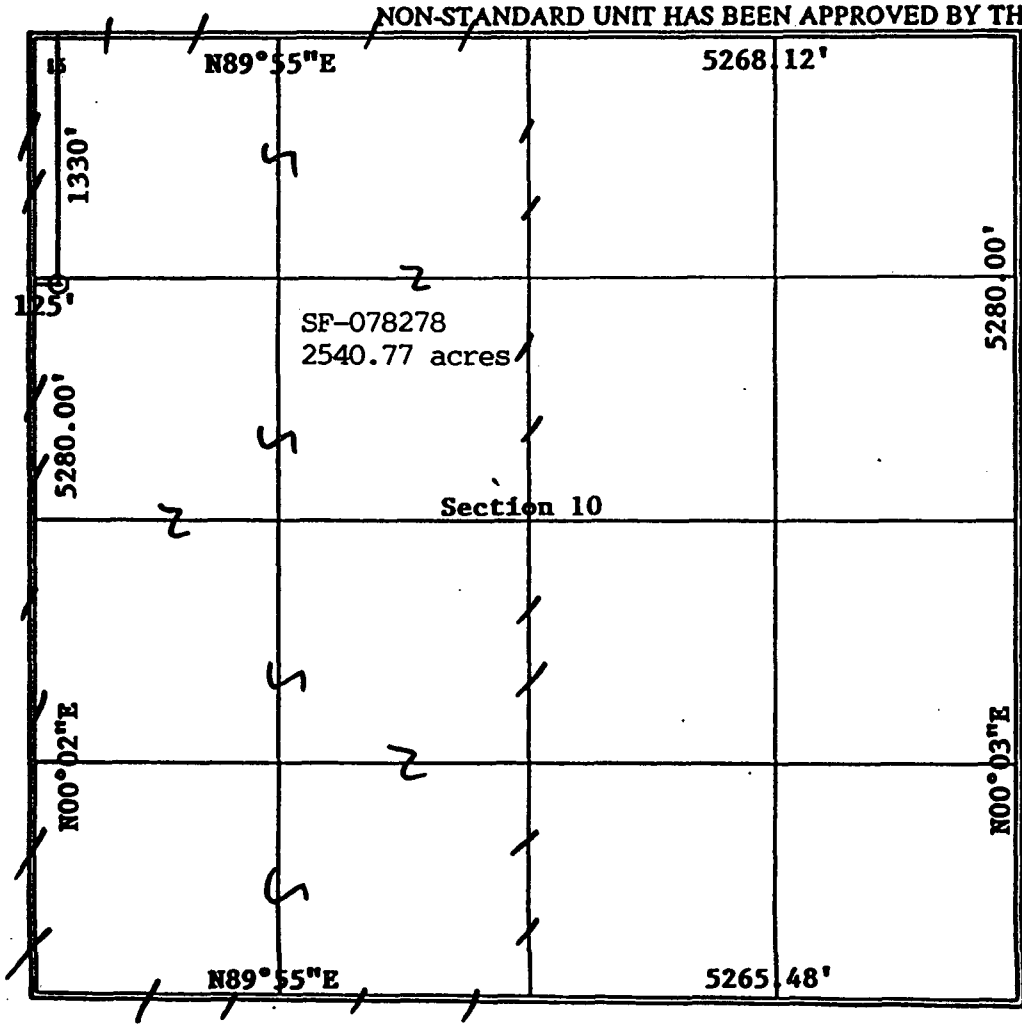
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
E	10	29N	6W		1330'	NORTH	125'	WEST	RIO ARRIBA

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
E									

¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
320 W/2	I	U	DHC application has been submitted

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

Patsy Clugston
Signature

Patsy Clugston
Printed Name

Regulatory Assistant
Title

5-17-99
Date

¹⁸ SURVEYOR CERTIFICATION

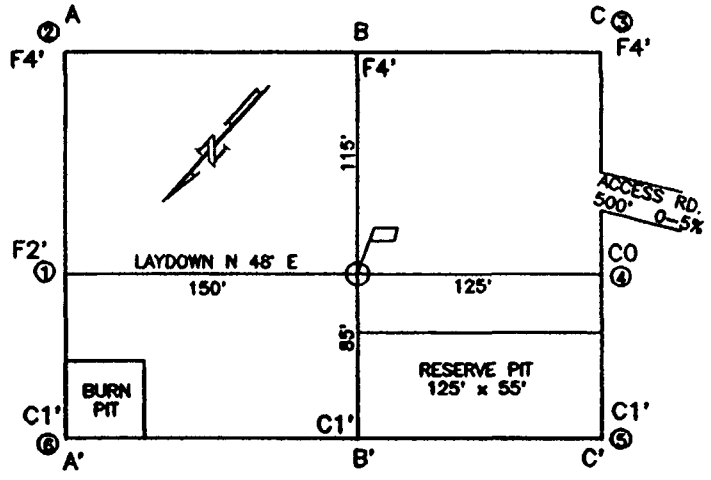
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

03/25/99
Date of Survey

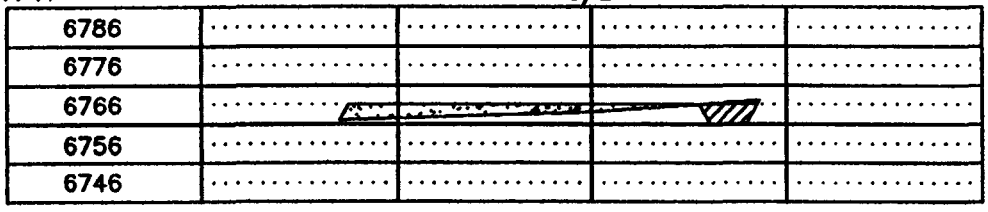
Signature and Seal of Professional Surveyer:

GARY P. BROADHURST, JR.
NEW MEXICO
10201
REGISTERED PROFESSIONAL LAND SURVEYOR

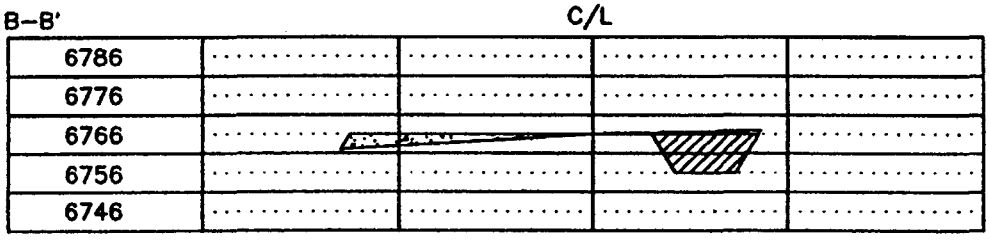
Certificate Number



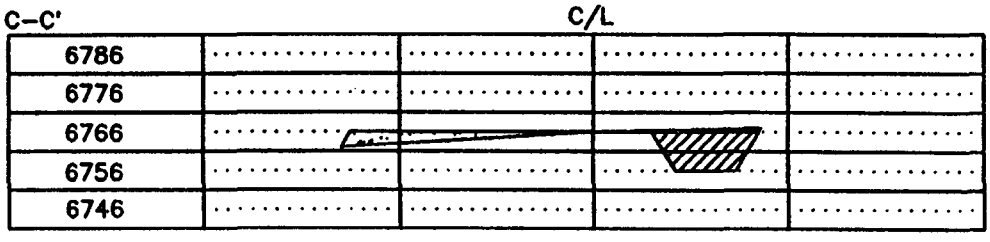
ELEVATION A–A'



B–B'



C–C'



COMPANY: PHILLIPS PETROLEUM COMPANY

LEASE: SAN JUAN 29-6 UNIT No.31B

FOOTAGE: 1330' FNL, 125' FWL UNIT E

SEC. 10 TWN. 29-N RNG. 06-W N.M.P.M.

COUNTY, RIO ARRIBA STATE, N.M.

ELEVATION: 6766

LATITUDE: 36-44-37

LONGITUDE: 107-27-30

PHILLIPS 66

PHILLIPS PETROLEUM COMPANY
FARMINGTON, NEW MEXICO

SURVEYED: 3/25/99	REV. DATE:	APP. BY H.B.
DRAWN BY: T.G.	DATE DRAWN: 3/26/99	FILE NAME: P007901

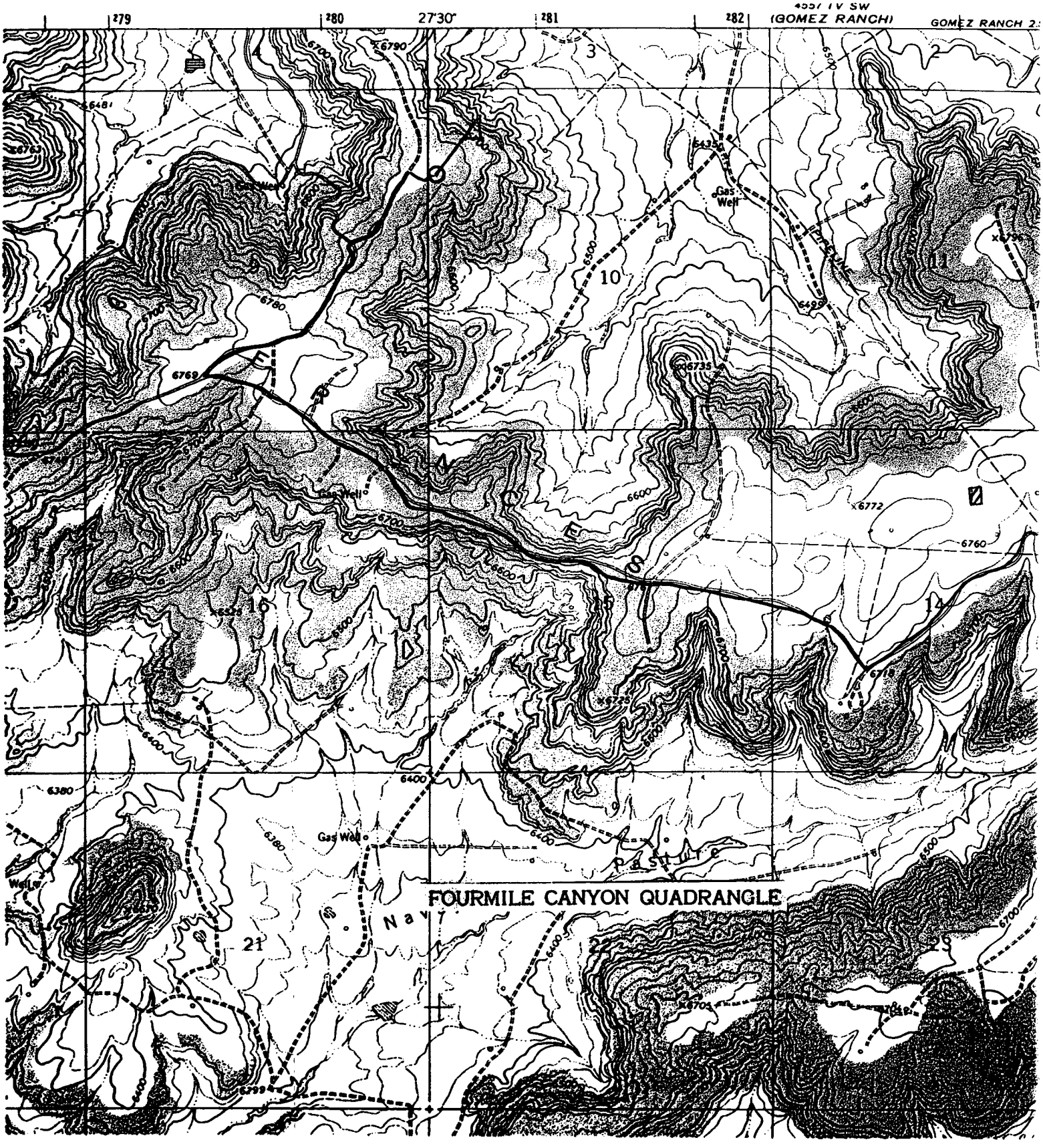
UNITED FIELD SERVICES INC.

P.O. BOX 3651
FARMINGTON, NM 87499
OFFICE: (505)334-0408

PHILLIPS PETROLEUM COMPANY

SAN JUAN 29-6 UNIT No.31B

1330' FNL, 125' FWL
NW/4 SEC.10, T-29-N, R-06-W, N.M.P.M.,
RIO ARRIBA COUNTY, NEW MEXICO
GROUND LEVEL ELEVATION: 6766



PHILLIPS PETROLEUM COMPANY
5525 HWY 64 NBU 3004
FARMINGTON, NEW MEXICO 87401

DATE: FEBRUARY 9, 2000

WELL NAME: SAN JUAN 29-6 # 31B
FORMATION: DAKOTA

TYPE TEST: STATIC GRADIENT

COUNTY: RIO ARRIBA
STATE: NEW MEXICO

TOTAL DEPTH:
PERFS: MID PERF 8068'
TUBING: 2 3/8" 7925'
CASING SIZE:
PACKER:
OTHER: 1.81" FN @ 7894'
PRESSURED UP @ 10:00

CASING PRESSURE: 750
TUBING PRESSURE: 730
OIL LEVEL:
WATER LEVEL:
TEMPERATURE:
ELEMENT NO. 86484
ELEMENT RANGE 0 TO 3000

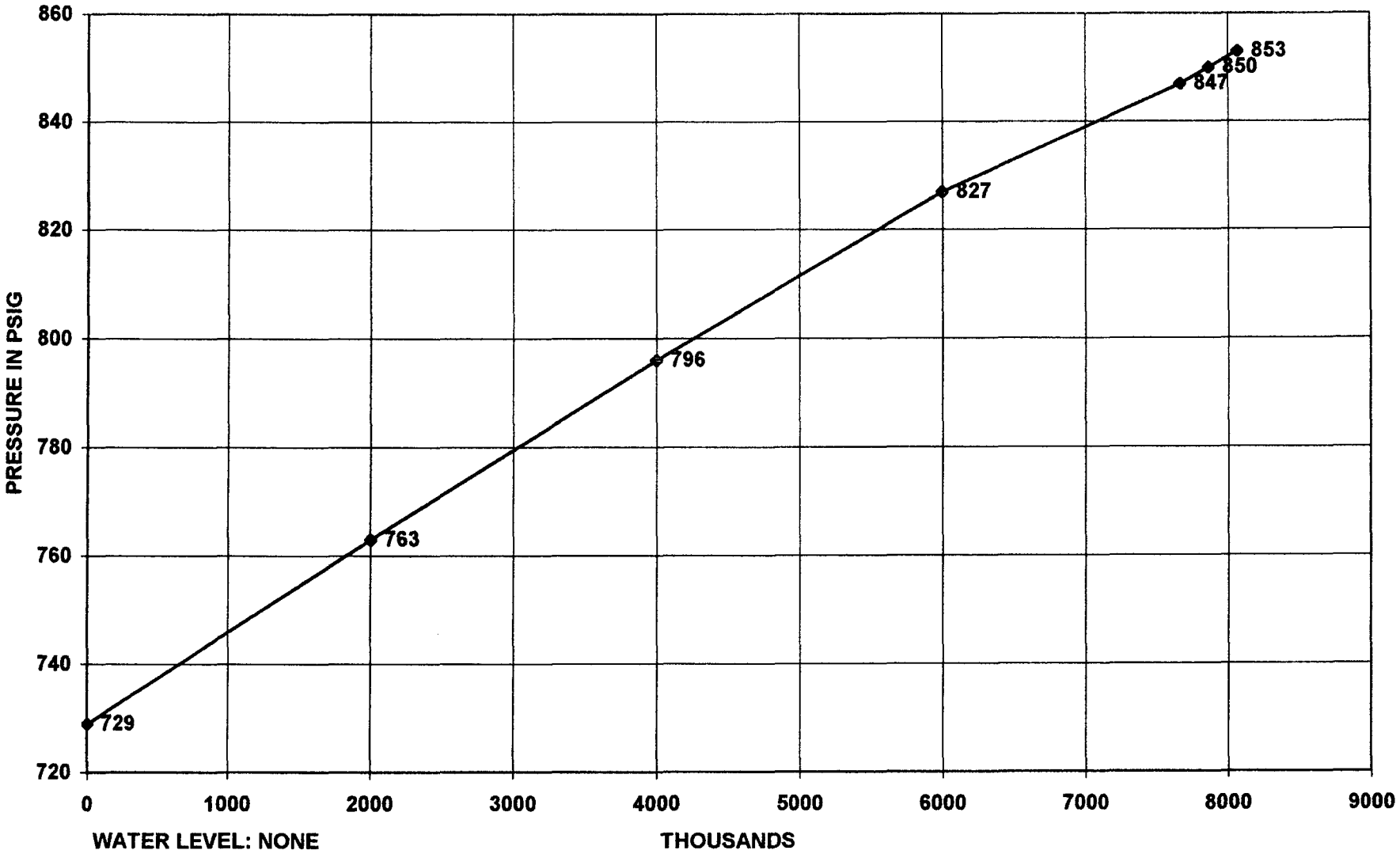
WELL STATUS: SHUT IN

DEPTH IN FEET	PRESSURE PSIG	GRADIENT PSI/FOOT
0	729	
2000	763	0.017
4000	796	0.017
6000	827	0.016
7668	847	0.012
7868	850	0.015
8068	853	0.015

TD @ 8128'

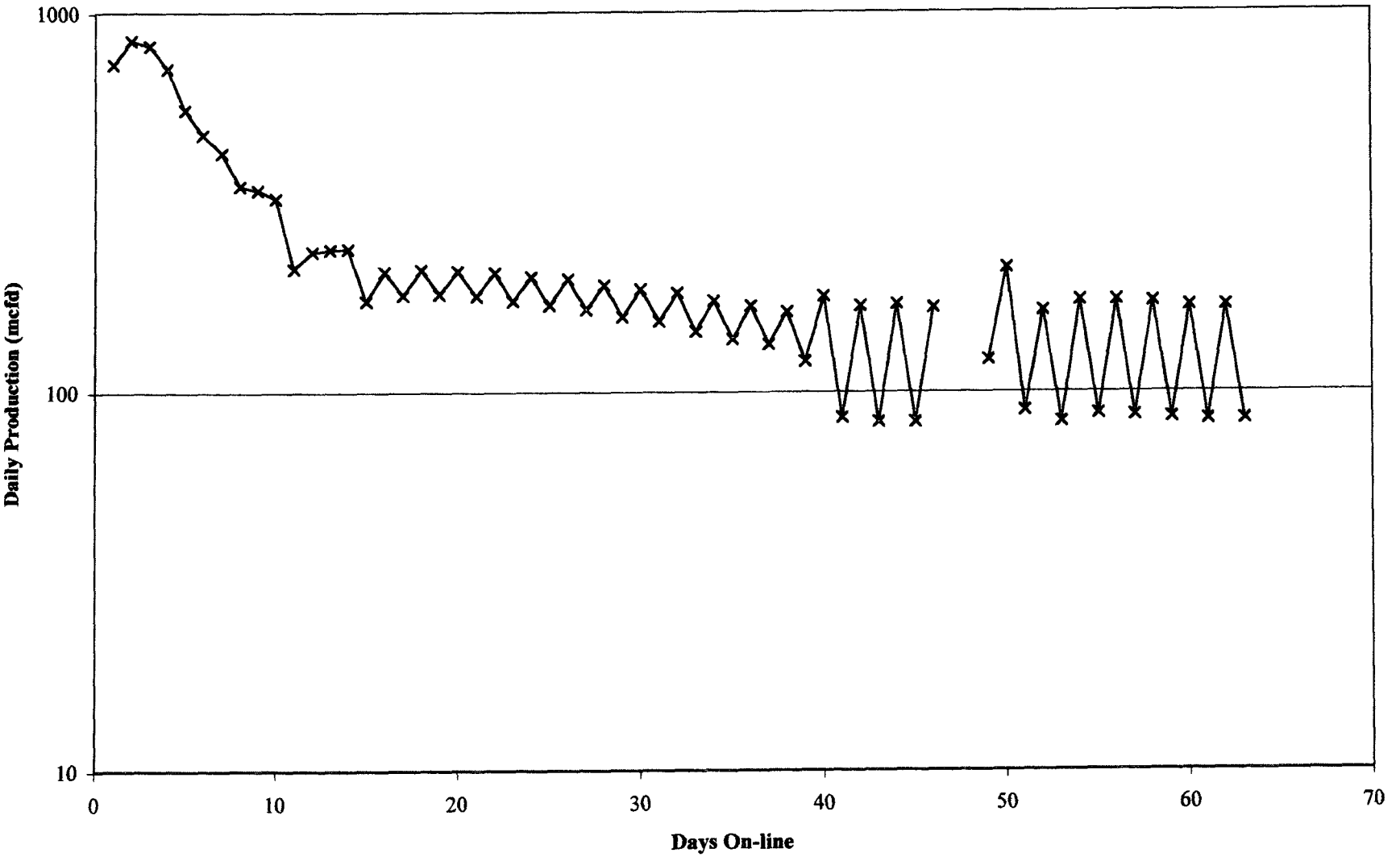
H & H WIRELINE SERVICE INC.
P. O. BOX 899
FLORA VISTA, NEW MEXICO 87415
OPERATOR: CHARLES HUGHES
UNIT NO. T-11

PHILLIPS PETROLEUM: SAN JUAN 29-6 # 31B
DATE: FEBRUARY 9, 2000



WATER LEVEL: NONE

San Juan 29-6 Unit #31B Dakota - Daily Rate vs. Days On-line



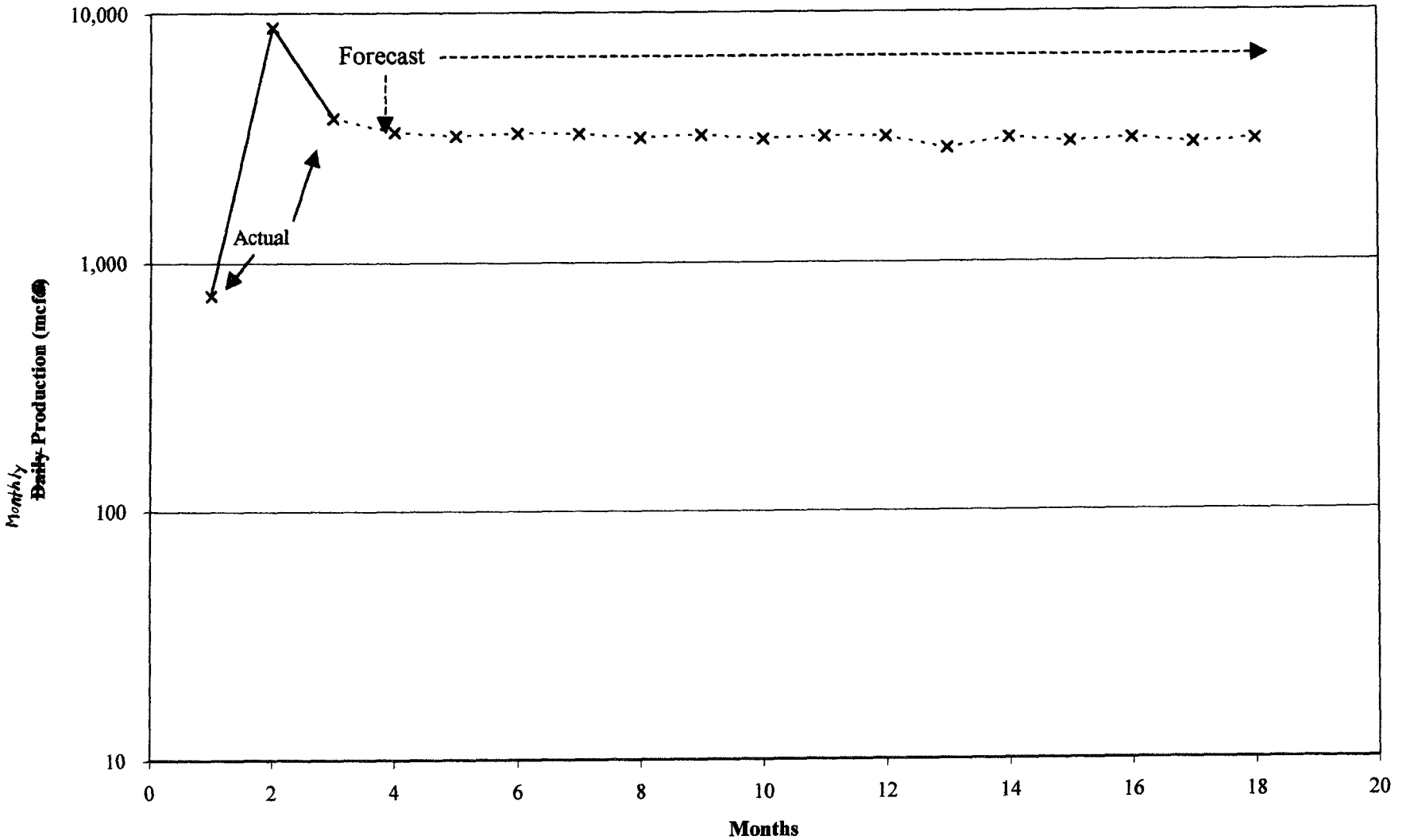
29-6 Unit #31B Dakota Forecast

Initial Production Rate	=	*110 MCFD*
Hyperbolic Exponent	=	*0.33*
Decline Rate	=	*8 %*

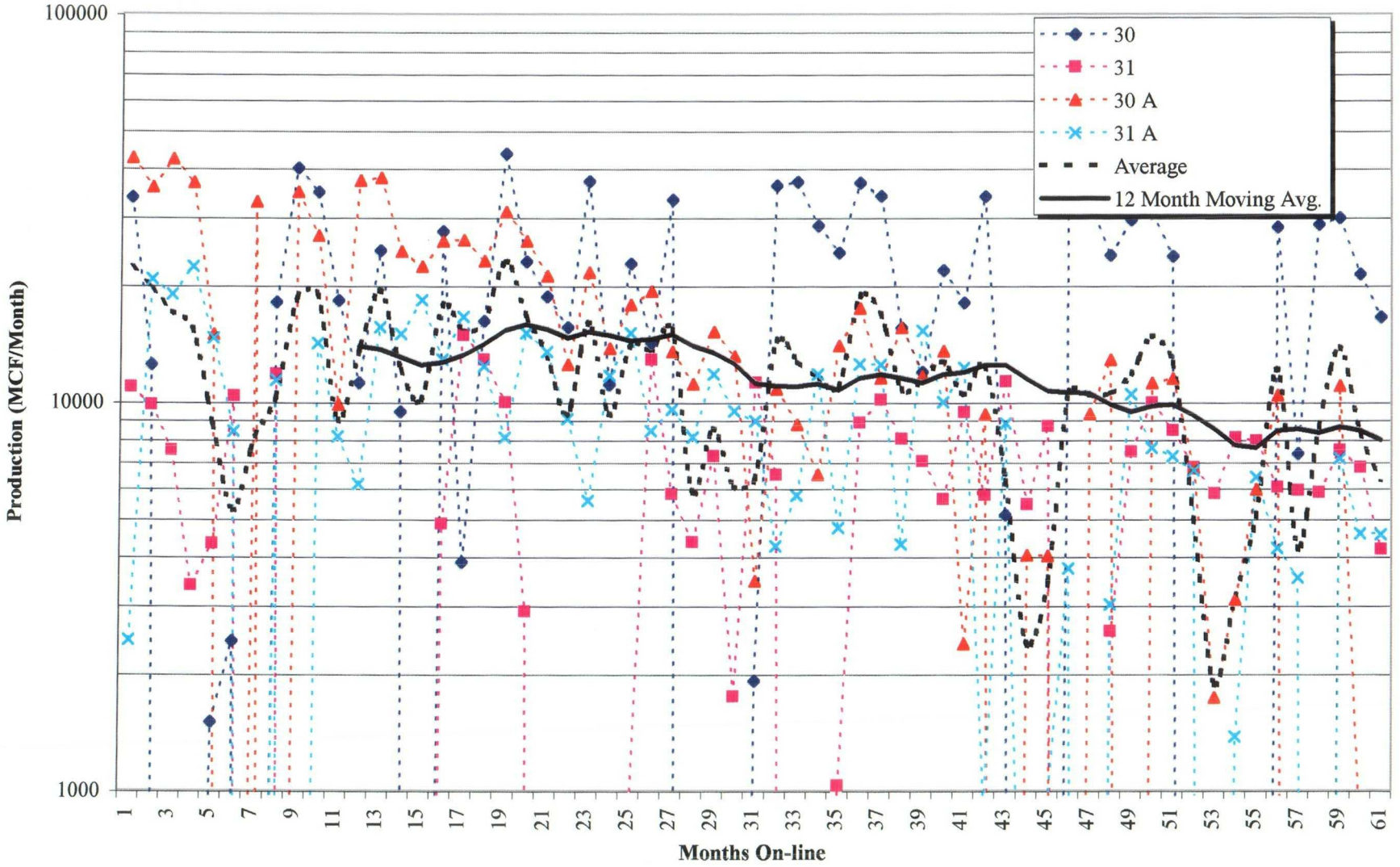
	Month	***Monthly MCF***	
1999	Nov	***733***	actual (1 day)
	Dec	***8,802***	actual
2000	Jan	***3,794***	actual
	Feb	***3,332***	
	Mar	***3,204***	
	Apr	***3,289***	
	May	***3,267***	
	Jun	***3,140***	
	Jul	***3,224***	
	Aug	***3,099***	
	Sep	***3,182***	
	Oct	***3,161***	
	Nov	***2,837***	
	Dec	***3,121***	
2001	Jan	***3,001***	
	Feb	***3,081***	
	Mar	***2,963***	
	Apr	***3,042***	

Use subtraction method for +/- 12 months based on this Dakota forecast.

San Juan 29-6 Unit #31B Dakota - Monthly Production and Forecast



San Juan 29-6 Unit #31B Area Mesaverde Production
First Five Years



Production Allocation Methodology

- ♦ Adding New Zone to Existing Zone - Initially Subtraction Method followed by Fixed Allocation Method
  - Subtraction Method (+/- 1st 12 months)
    - Forecast production rate by month for existing zone utilizing established decline curve for zone
    - Subtract forecasted rate from commingled rate to define new zone rate
    - Utilize subtraction method for +/- 12 months until new zone rate stabilizes, then utilize fixed allocation method with current rates
  - Fixed Allocation Method (after Subtraction Method)
    - Utilize forecasted rate from established decline curve for lower zone
    - Calculate upper zone rate by subtracting lower zone rate from commingled rate
    - Lower zone allocation = $\frac{\text{Lower zone rate}}{\text{Commingled rate}}$
    - Upper zone allocation = (Commingled rate - Lower zone rate) / Commingled rate