Office District I Energy, Minerals and Natural Resources	/ Form C-103
BISTITUTE IN THE PROPERTY OF T	March 4, 2004
1625 N. French Dr., Hobbs, NM 88240	WELL APLYO.
District II 1301 W. Grand Ave. Attacia, NM 88310 OIL CONSERVATION DIVISION	30-045-32155
1301 W. Oland Ave., Artesia, 1414 60210	5. Indicate Type of Lease
District III 1220 South St. Francis Dr.	STATE FEE
District IV Santa Fe, NM 87505	6. State Oil & Gas Lease No.
1220 S. St. Francis Dr., Santa Fe, NM	Federal SF-079010
87505	
SUNDRY NOTICES AND REPORTS ON WELLS	7. Lease Name or Unit Agreement Name
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A	
DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH	Northeast Blanco Unit
PROPOSALS.) 1. Type of Well:	8. Well Number
Oil Well Gas Well Other	325N
2. Name of Operator	9. OGRID Number
Devon Energy Corp.	6137
3. Address of Operator	10. Pool name or Wildcat
20 North Broadway, Oklahoma City, OK 73102	Blanco Mesaverde / Basin Dakota
4. Well Location	
Alconomy Comments	
Unit Letter K : 2,000 feet from the South line and 2,555 feet from the West line	
Ome Ectici 14	
Section 23 Township 31N Range 7W NMPM	County San Juan
11. Elevation (Show whether DR, RKB, RT, GR, etc.	
GR - 6,451' Pit or Below-grade Tank Application (For pit or below-grade tank closures, a form C-144 must be attached)	
Pit Location: ULSectTwpRngPit typeDepth to Groundwater_>	>Distance from nearest fresh water well_>
Distance from nearest surface water_> Below-grade Tank Location ULSect Twp	Rng ;
feet from theline andfeet from theline	
Recording the line and line an	
12. Check Appropriate Box to Indicate Nature of Notice,	Report or Other Data
	SEQUENT REPORT OF:
PERFORM REMEDIAL WORK PLUG AND ABANDON REMEDIAL WOR	K ALTERING CASING
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ATTACHMENTS TO APPLICATION TO DOWNHOLE COMMINGLE

The following information is being provided as supporting data for application to down hole commingle production from the following well:

Well:

NEBU 325N

Location:

Sec. 23, T31N, R7W

San Juan County, New Mexico

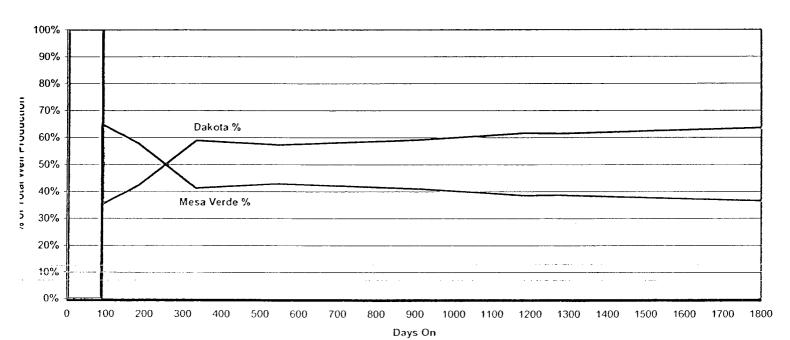
- 1. Case # 12346, Order # R-11363 establishes the two subject pools as pre-approved for commingling.
- 2. The pools to be commingled are the Blanco-Mesaverde (72319) and the Basin Dakota (71599).
- 3. The subject well is presently completed in both zones flowing and measured separately. The perforated interval in the Basin-Dakota pool being 8048'- 7947'. The perforated interval in the Blanco-Mesaverde pool being 5901'- 4448'.
- 4. Commingling will not reduce the value of the total remaining production in this well. Produced waters from both the Basin-Dakota and the Blanco-Mesaverde have been found to be compatible, with no evidence of scaling problems on tubules, or of precipitate fill in the well bore. The increased volume of gas flowing up the tubing will facilitate the well's ability to unload itself, thus increasing production and reducing potential operational problems.
- 5. Notice has been sent to all interest owners in the spacing unit by certified mail (return receipt) of Devon Energy's intent to down hole commingle production. A copy of this notice and a list of all working interest owners are attached.
- 6. A copy of this notice of intent to down hole commingle has been sent to the Bureau of Land Management.

Method of Allocation

Devon Energy recommends the following procedure to allocate downhole commingled production between the Basin-Dakota and the Blanco-Mesaverde pools within the Northeast Blanco Unit:

- The Mesaverde and Basin-Dakota formations will be completed simultaneously.
- A single 2-3/8" tubing string will be run in the well, with a packer isolating the two horizons.
- The Dakota completion will be produced up the tubing string.
- The Mesaverde completion will be produced up the 2-3/8" x 4-1/2" annulus.
- Production from each zone will be measured separately using a 3 phase metering device prior to
 flowing through a mutual production separator. Total well stream gas will be measured using a
 conventional orifice plate meter tube located downstream of the production separator.
- The completions will be flow tested separately for approximately 90 days to establish a stabilized rate and trend.
- Following the testing period the packer will be removed and the two pools will be downhole commingled. Total well production will flow through common surface facilities and total produced gas will be measured using a conventional orifice plate meter tube.
- Production will be allocated between the Mesa Verde and Dakota intervals by applying the variable percentage schedule to the daily total well production.

The Variable Percentage Schedule was derived using Mesa Verde and Dakota production type curves. These type curves were generated by normalizing production data from surrounding wells. The variable percentage schedule is required due to the dissimilar decline trends exhibited by the Mesa Verde and Dakota. Figure 1 depicts a typical Mesa Verde – Dakota production allocation. The actual percentages will vary from well to well, depending on well productivity.



Typical MV - DK Downhole Commingle Production % Schedule

Figure 1