DISTRICT I

P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II

811 South First St., Artesia, NM 88210-2835 DISTRICT III

TYPE OR PRINT NAME: Wayne Fletcher

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-107-A New 3-12-96 OIL CONSERVATION DIVISION

APPROVAL PROCESS:

X Administrative ____Hearing

EXISTING WELLBORE

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

APPLICATION FOR DOWNHOLE COMMINGLING X YES NO 1000 Rio Brazos Rd, Aztec, NM 87410-1693 PO Box 4289, Farmington, NM 87499 **Burlington Resources Oil & Gas Company** Rio Arriba 170 ∕B 05-27N-06W San Juan 28-6 Unit it I.tr. - Sec - Twp - Rge County acing Unit Lease Types: (check 1 or more) API NO. 30-039-20482 **Federal** 7462 OGRID NO. 14538 **Property Code** The following facts are submitted in support of downhole committingling: Lower Zone Intermediate Upper Zue Zone Basin Dakota - 71599 Blanco Mesaverde - 72319 1. Pool Name and Pool Code will be supplied upon completion will be supplied upon completion 2. Top and Bottom of Pay Section (Perforations) gas 3. Type of production (Oil or Gas) flowing 4. Method of Production (Flowing or Artificial Lift) flowing 11 843 psi (see attachment) (Current) a. 672 psi (see attachment) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current (Original) b. 1282 psi (see attachment) b. 3131 psi (see attachment) QD) All Gas Zones: Estimated or Measured Original BTU 1164 BTU 1183 6. Oil Gravity (API) or Gas BTU Content shut in shut in 7. Producing or Shut-In? ves Production Marginal? (yes or no) If Shut-In and oil/gas/water rates of last production Date: n/a Date: n/a Date: Rates: Note: For new zones with no production history, applicant shall be required to attach production setimates and supporting data. Date: n/a Date: n/a Date * If Producing, give data and oil/gas/water water of recent test (within 60 days) Rates: Rates: Gas: % 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: Oil: will be supplied upon completion will be supplied upon completion 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? If not, have all working, overriding, and royalty interests been notified by certified mail? 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? 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 _ attached 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 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. DATE: 11-15-99 TITLE: Production Engineer **SIGNATURE**

TELEPHONE NO.:

(505) 326-9700

District I PO Box 1980, Hobbs, NM 88241-1980 District II State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION

PO Box 2088 Santa Fe, NM 87504-2088 Form C-102 Revised February 21, 1994 Instructions on back

PO Drawer DD, Artesia, NM 88211-0719

Submit to Appropriate District Office

District III 1000 Rio Brazos Rd., Aztec, NM 87410 State Lease - 4 Copies
Fee Lease - 3 Copies

District IV PO Box 2088, Santa Fc. NM 87564-2088 AMENDED REPORT

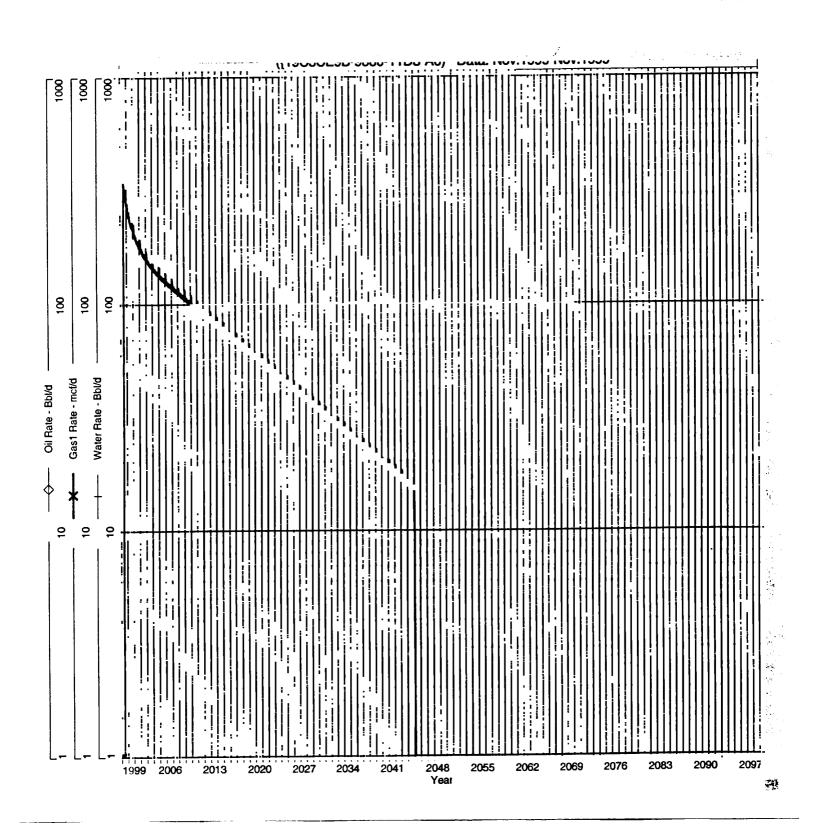
WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	1 Pool Code	Pool Name	
30-039-20482	72319/71599	Blanco Mesaverde/Basin	Daķota
' Property Code 7462	°r San Juan 2	roperty Name 8-6 Unit	• Well Number
'OGRID No. 14538	Burlington Resour	ces Oil & Gas Company	'Elevation 6684 GR
	10 Su	rface Location	

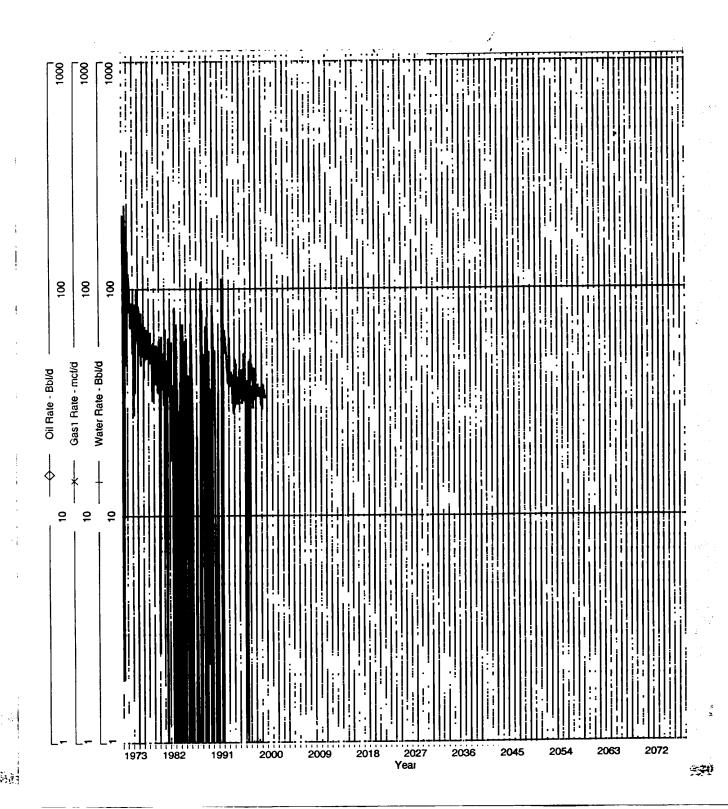
Feet from the East/West line County North/South line Feet from the Lot Idn Range Section Township UL or lot no. 1460 East 1650 North 6W G 27N 11 Bottom Hole Location If Different From Surface Feet from the East/West line County North/South line Range Lot Idn Feet from the UL or lot no. Section Township 14 Consolidation Code 15 Order No. 12 Dedicated Acres 13 Joint or Infill E/320.87

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

OK II I.O.	-STANDARD UNIT HAS I		
16	,02		17 OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief
Original plat from David O. Vilven 3-8-7	1		Deggy Cale
			Peggy Cole Printed Name
		14601	Regulatory Administrator
			18SURVEYOR 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.
			Date of Survey Signature and Seal of Professional Surveyer:
			Certificate Number
			Certificate (4umber



San Juan 28-6 Unit #170 Expected Production Dakota Formation



Page No.: 1
Print Time: Thu Nov 11 15:26:14 1999
Property ID: 1841
Property Name: SAN JUAN 28-6 UNIT | 38 | 49355A
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

1005 0	<u>San Juan 28-6 Unit #170</u>
	Mesaverde 🛮 ffset
661.0	
647.0	
492.0	
616.0	
612.0	
594.0	
544.0	
539.0	
494.0	
547.0	
583.0	
578.0	
599.0	
581.0	
582.0	
570.0	
582.0	
	1095.0 1094.0 780.0 690.0 703.0 690.0 671.0 707.0 679.0 661.0 647.0 492.0 616.0 612.0 594.0 544.0 539.0 494.0 547.0 583.0 578.0 599.0 582.0 570.0

Page No.: 3
Print Time: Thu Nov 11 15:26:15 1999
Property ID: 1770
Property Name: SAN JUAN 28-6 UNIT | 170 | 44073A
Table Name: R:\RESERVES\GDPNOS\TEST.DBF

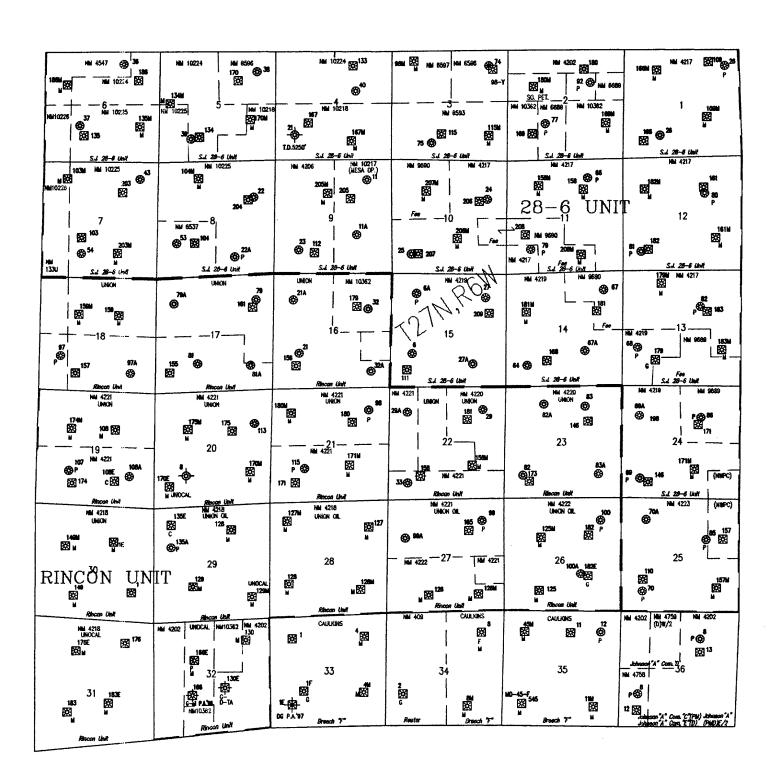
DATE	CUM_GAS		
10/12/72 02/26/73 07/31/74 06/24/75 07/29/76 08/01/77 05/08/79 09/29/81 11/04/81 09/22/83 11/07/85 04/22/90 07/15/93	0 29762 194554 267655 360356 438786 548495 662191 673175 745082 803825 954225 1084219	2547.0 1787.0 1120.0 1117.0 972.0 820.0 822.0 881.0 636.0 1007.0 998.0 812.0 700.0	<u>San Juan 28-6 Unit #170</u> Existing Dakota

SJ 28-6 Unit #170

Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method Version 1.0 3/13/94

Mesaverde	Dakota	
<u>MV-Current</u>	DK-Current	
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 672.4	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.18 %CO2 1.14 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 843.2	
MV-Original	DK-Original	
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1095 BOTTOMHOLE PRESSURE (PSIA) 1281.6	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.14 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3131.2	

San Juan 28-6 Unit #170 Blanco Mesaverde / Basin Dakota 27N06W05B



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:

- 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:

- 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.