

## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

July 10, 2001

Lori Wrotenbery
Director
Oil Conservation Division

Energen Resources Corporation 2198 Bloomfield Highway Farmington, New Mexico 87401

Attention: Mr. Gary W. Brink

Re: Form C-107-A

San Juan 30-4 Unit No. 42A

Dear Mr. Brink: P-19-30N-4W
30-039-26190

JUL 2001
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OIL CON. DIV
DIST. 3

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I have reviewed your application to downhole commingle Pictured Cliffs and Mesaverde production within the San Juan 30-4 Unit No. 42A, and I have some concerns about your proposed production allocation. You have proposed that 56% of the gas be allocated to the Pictured Cliffs pool and that 44% of the gas be allocated to the Mesaverde pool. This allocation is apparently based upon a production test conducted on May 8 & 13, 2001. According to Division records, the average daily production from the Pictured Cliffs interval during the period from September 2000 to February 2001 was 458 MCF, and the average for the Mesaverde during the same period was 109 MCF. Since the ownership of these zones is not common, it is imperative that the allocation formula reflect, as accurately as possible, the actual producing rates of each of the commingled pools.

Please provide additional data or information on how the proposed production allocation was determined, and whether this proposed allocation protects all interest owners in the well.

Your application will be processed upon receipt of the requested data.

Sincerely,

David Catanach Engineer

Xc: OCD-Aztec