Entered January 25, 1977

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE NO. 5693 Order No. R-5359

APPLICATION OF JEROME P. MCHUGH FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on June 9, 1976, at Santa Fe, New Mexico, before Examiner Daniel S. Nutter.

NOW, on this <u>25th</u> day of January, 1977, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant, Jerome P. McHugh, seeks an order authorizing the downhole commingling of Fruitland and Pictured Cliffs production in the well-bores of wells drilled anywhere within Townships 24 North through 28 North, Ranges 24 West through 28 West, NMPM, San Juan County, New Mexico, except that said commingling authority would not apply to lands included within the horizontal boundaries, as defined by the Commission, of that portion of the Ballard-Pictured Cliffs Pool, the Fulcher-Kutz Pictured Cliffs Pool or the West Kutz-Pictured Cliffs Pool lying within the above described townships and ranges, nor to lands not within the horizontal boundaries of said pools but within the horizontal boundaries of the Gallegos Canyon Unit Area.

(3) That in portions of the area sought by applicant to be authorized for downhole commingling of Fruitland and Pictured Cliffs production, there appear to be marginal reserves of -2-Case No. 5693 Order No. R-5359

hydrocarbon gas present in said formations; and that development of said reserves by production through single completions or even by dual completions in said formations is uneconomic.

(4) That in portions of the area sought by applicant to be authorized for downhole commingling of Fruitland and Pictured Cliffs production, reservoir pressures in said formations appear to be virtually equal, and differential pressures between the formations of negligible magnitude.

(5) That in the aforesaid areas of marginal reserves and virtually equal pressures, the downhole commingling of Fruitland and Pictured Cliffs production should result in the recovery of otherwise unrecoverable reserves of natural gas, and should be permitted through administrative approval by the Secretary-Director of the Commission upon a showing that a well is of low marginal productive capacity from both the Fruitland and Pictured Cliffs formations and that there is no substantial difference in the reservoir pressures of the two formations.

(6) That of the lands sought by applicant for approval for downhole commingling of the Fruitland and Pictured Cliffs formations, it appears that the following described lands in San Juan County, New Mexico, meet the prerequisite conditions outlined in Findings Nos. (3) through (5) above, and should be authorized for administrative approval of such commingling:

> TOWNSHIP 24 NORTH, RANGE 9 WEST, NMPM Sections 1 through 5: All Sections 10 through 14: All Section 24: All

> TOWNSHIP 25 NORTH, RANGE 9 WEST, NMPM Sections 2 through 36: All

TOWNSHIP 25 NORTH, RANGE 10 WEST, NMPM Sections 1 through 18: All Sections 20 through 27: All Section 36: All

TOWNSHIP 25 NORTH, RANGE 11 WEST, NMPM Sections 1 through 6: All Section 7: N/2 Sections 8 through 13: All Section 14: N/2 Section 15: N/2 -3-Case No. 5693 Order No. R-5359

> TOWNSHIP 25 NORTH, RANGE 12 WEST, NMPM Sections 1 and 2: All Section 3: N/2Section 4: N/2 Section 12: N/2 TOWNSHIP 26 NORTH, RANGE 9 WEST, NMPM Section 19: All Section 28: SW/4 Section 29: S/2 Sections 30 through 33: A11 TOWNSHIP 26 NORTH, RANGE 10 WEST, NMPM Sections 19 through 36: All TOWNSHIP 26 NORTH, RANGE 11 WEST, NMPM Sections 5 through 8: All Sections 13 through 36: All TOWNSHIP 26 NORTH, RANGE 12 WEST, NMPM Sections 1 through 30: All Section 31: N/2 Sections 32 through 36: All TOWNSHIP 26 NORTH, RANGE 13 WEST, NMPM Sections 1 through 17: All Section 18: N/2 N/2 Section 21: Sections 22 through 25: All Section 26: N/2 TOWNSHIP 26 NORTH, RANGE 14 WEST, NMPM Sections 1 through 3: All Sections 11 and 12: All TOWNSHIP 27 NORTH, RANGE 11 WEST, NMPM Section 31: W/2 TOWNSHIP 27 NORTH, RANGE 12 WEST, NMPM Section 17: S/2 Sections 18 through 21: All Section 22: W/2 Section 25: W/2 Sections 26 through 36: All TOWNSHIP 27 NORTH, RANGE 13 WEST, NMPM Sections 4 through 11: All Sections 13 through 36: All

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-4-Case No. 5693 Order No. R-5359

> TOWNSHIP 27 NORTH, RANGE 14 WEST, NMPM Sections 1 through 29: All Sections 33 through 36: All TOWNSHIP 27 NORTH, RANGE 15 WEST, NMPM Sections 1 through 3: All Sections 11 through 13: All TOWNSHIP 28 NORTH, RANGE 13 WEST, NMPM Partial Sections 7 and 8: All Sections 17 through 20: All

Section 28: S/2 Sections 29 through 33: All TOWNSHIP 28 NORTH, RANGE 14 WEST, NM

TOWNSHIP 28 NORTH, RANGE 14 WEST, NMPM Partial Sections 7 through 12: All Sections 13 through 36: All

TOWNSHIP 28 NORTH, RANGE 15 WEST, NMPM Partial Sections 7 through 12: All Sections 13 through 29: All Sections 33 through 36: All

(7) That adoption of an administrative procedure for the approval of downhole commingling of Fruitland and Pictured Cliffs production in the above described area under the conditions outlined in Findings Nos. (3) through (5) above, should result in the recovery of otherwise unrecoverable hydrocarbons thereby preventing waste, will not impair correlative rights, and should be approved.

IT IS THEREFORE ORDERED:

(1) That the Secretary-Director of the Commission is hereby authorized to approve commingling of Fruitland and Pictured Cliffs production in the wellbore of any well drilled in the following described area in San Juan County, New Mexico:

> TOWNSHIP 24 NORTH, RANGE 9 WEST, NMPM Sections 1 through 5: All Sections 10 through 14: All Section 24: All TOWNSHIP 25 NORTH, RANGE 9 WEST, NMPM Sections 2 through 36: All TOWNSHIP 25 NORTH, RANGE 10 WEST, NMPM Sections 1 through 18: All Sections 20 through 27: All Section 36: All

-5-Case No. 5693 Order No. R-5359

> TOWNSHIP 25 NORTH, RANGE 11 WEST, NMPM Sections 1 through 6: All Section 7: N/2 Sections 8 through 13: All Section 14: N/2 Section 15: N/2 TOWNSHIP 25 NORTH, RANGE 12 WEST, NMPM Sections 1 and 2: All Section 3: N/2 Section 4: N/2 Section 12: N/2 TOWNSHIP 26 NORTH, RANGE 9 WEST, NMPM Section 19: All Section 28: SW/4 Section 29: S/2 Sections 30 through 33: All TOWNSHIP 26 NORTH, RANGE 10 WEST, NMPM Sections 19 through 36: All TOWNSHIP 26 NORTH, RANGE 11 WEST, NMPM Sections 5 through 8: All Section 13 through 36: All TOWNSHIP 26 NORTH, RANGE 12 WEST, NMPM Sections 1 through 30: All Section 31: N/2 Sections 32 through 36: All TOWNSHIP 26 NORTH, RANGE 13 WEST, NMPM Sections 1 through 17: All Section 18: N/2 Section 21: N/2 Sections 22 through 25: All Section 26: N/2 TOWNSHIP 26 NORTH, RANGE 14 WEST, NMPM Sections 1 through 3: All Sections 11 and 12: All TOWNSHIP 27 NORTH, RANGE 11 WEST, NMPM Section 31: W/2

-6-Case No. 5693 Order No. R-5359

> TOWNSHIP 27 NORTH, RANGE 12 WEST, NMPM Section 17: S/2 Sections 18 through 21: A11 Section 22: W/2 Section 25: W/2 Sections 26 through 36: All TOWNSHIP 27 NORTH, RANGE 13 WEST, NMPM Sections 4 through 11: All Sections 13 through 36: All TOWNSHIP 27 NORTH, RANGE 14 WEST, NMPM Sections 1 through 29: All Sections 33 through 36: All TOWNSHIP 27 NORTH, RANGE 15 WEST, NMPM Sections 1 through 3: All Sections 11 through 13: All TOWNSHIP 28 NORTH, RANGE 13 WEST, NMPM Partial Sections 7 and 8: All Sections 17 through 20: A11 Section 28: S/2 Sections 29 through 33: A11 TOWNSHIP 28 NORTH, RANGE 14 WEST, NMPM Partial Sections 7 through 12: All Sections 13 through 36: A11

TOWNSHIP 28 NORTH, RANGE 15 WEST, NMPM Partial Sections 7 through 12: All Sections 13 through 29: All Sections 33 through 36: All

(2) That to obtain approval for the downhole commingling of Fruitland and Pictured Cliffs production in the wellbore of any well completed in the aforedescribed area, the operator of said well shall file one copy of the request for such approval with the Secretary-Director of the Commission and one copy with the Supervisor of the Commission District Office at Aztec. Such request shall contain evidence as to the productivity or expected productivity of each of the aforesaid formations proposed to be commingled, as well as reservoir pressures encountered or expected to be encountered. In addition, data shall be submitted which will enable the Secretary-Director to prescribe an allocation formula for allocating production to each of the formations to be commingled. -7-Case No. 5693 Order No. R-5359

(3) The Secretary-Director of the Commission shall have authority to rescind downhole commingling authority granted for any well prior to its completion if data available upon completion of the well indicates greater than marginal production from either or both of the commingled formations or a pressure differential between the commingled formations which might cause waste.

(4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

PHIL R. LUCERO, Chairman this **ENERY** ARNOLD mber 0 JOE D. RAMEY, Member & Secretary

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