Entered January 8, 1980

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

> CASE NO. 6702 Order No. R-6235

APPLICATION OF EL PASO NATURAL GAS COMPANY FOR DOWNHOLE COMMINGLING, RIO ARRIBA COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 9 a.m. on November 28, 1979, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this <u>9th</u> day of January, 1980, the Division Director, 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 Division has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant, El Paso Natural Gas Company, is the owner and operator of the San Juan 27-5 Unit Well No. 67, located in Unit B of Section 31, Township 27 North, Range 5 West, NMPM, Rio Arriba County, New Mexico.

(3) That the applicant seeks authority to commingle South Blanco-Pictured Cliffs and Blanco Mesaverde production within the wellbore of the above-described well.

(4) That from the South Blanco-Pictured Cliffs zone, the subject well is capable of low marginal production only.

(5) That from the Blanco Mesaverde zone, the subject well is capable of low marginal production only.

(6) That the bottom-hole pressure in the Mesaverde zone is approximately three times that of the Pictured Cliffs zone.

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(7) That the Division has previously found that when bottom-hole pressures of zones to be commingled differ by a factor greater than two, potentially damaging crossflow between zones could occur if the well should be shut in.

(8) That there is no mechanism to assure the Division that said San Juan 27-5 Unit Well No. 67 would not be shut-in following completion of the proposed downhole commingling.

(9) That to avoid the potential for waste the subject application should be denied.

IT IS THEREFORE ORDERED:

(1) That the application of El Paso Natural Gas Company to commingle South Blanco-Pictured Cliffs and Blanco Mesaverde production within the wellbore of the San Juan 27-5 Unit Well No. 67, located in Unit B of Section 31, Township 27 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, is hereby denied.

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

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

STATE OF NEW MEXICO QIL CONSERVATION DIVISION NE JOE D. RAMEY Director

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