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Mr. William J. LeMay, Director New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, NM 87504

RE: Request for Administrative Approval of Downhole Commingling Otero Gallup Oil Pool and Basin Dakota Gas Pool Dugan Production Corp. Jicarilla Otero Com No. 1 Jicarilla Contract No. 12 and 13 890' FSL & 990' FWL (Unit M), Section 22, T-24N, R-5W Rio Arriba County, NM

Dear Mr. LeMay:

Dakoka 6627-6765'

Dugan Production Corp. herein requests administrative approval for the downhole commingling of existing production from the Basin Dakota Gas Pool with production that results from our proposed recompletion in the Otero Gallup Oil Pool in the captioned well.

The Jicarilla Otero Com No. 1 was completed on July 9, 1979 by Mobil Corp. in the Basin Dakota gas pool with a 320 acre spacing unit comprising of the S/2 of Section 22, T-24N, R-5W. The Dakota spacing unit consists of a 160 acre lease (SW/4) which is a portion of Jicarilla Contract No. 12 lease held by Mobil and a 160 acre lease (SE/4) which is a portion of the Jicarilla Contract No. 13 held by Amerada Hess Corp. Mobil's interest was purchased by Dugan Production Corp. effective December 1, 1988. Production from this well averages 4 to 12 MCFD, depending upon pipeline pressure, + approximately 0.17 bbls condensate per day and is very near it's economic limit. As of March 1, 1991, cumulative production was 373,965 MCF + 3,518 bbls of condensate. In an effort to maintain a continuing economic operation in the well, Dugan Production has proposed that a completion attempt be made in the Otero Gallup Pool.

With reference to Attachment A, which is a copy of our Authorization for Expenditure (AFE) to perform this recompletion attempt (which has been approved by Dugan Production and our 50% working interest owner, Amerada Hess Corp.), it can be seen that an expenditure of approximately \$106,600 will be required for the attempted Gallup recompletion which also includes \$43,100 for the

installation of rod pump artificial lift equipment.

Attachment B presents the production history from the Dakota completion in the Jicarilla Otero Com No. 1, and as can be seen from the production plot, the Dakota completion has very little remaining reserves as of March 1, 1991. Production from the Dakota has been very erratic since 1985 and it is our belief that the Dakota reservoir pressure has reached a level that allows а relatively minor amount of liquid production to inhibit the well's ability to produce. The liquid production is very minor and we are not able to justify artificial lift equipment based upon the Dakota formation only. It is our belief that approximately 21,100 MCF of gas remains to be produced from the Dakota based upon curve #2 presented on Attachment B. It is conceivable that production could be restored to approximately 1500 MCF per month as indicated by curve #3 which would substantially increase the amount of recoverable gas remaining in the Dakota completion. The forecast presented by curve #3 is believed to be optimistic in view of past efforts to produce the well not only by Dugan Production since acquiring from Mobil, but also by Mobil Oil.

Attachment C presents a summary of production data for eight wells that have been completed in the Otero Gallup oil pool within a one mile radius of the subject well. As can be seen, the Gallup formation in this general area is marginal for a 5700' oil pool. Of the eight wells presented on Attachment C, one was plugged as noncommercial upon the initial completion and only seven have produced with cumulatives ranging from 7,136 to 42,228 BO. During the most recent three months of production, seven wells are currently averaging 3.1 BOPD + 0.14 BWPD + 16 MCFD. Based upon these production numbers, we do not believe that it is economical to drill a development well in the Otero Gallup pool at the current time, however, we do believe that economics are sufficient to justify our proposed recompletion attempt. In view of the low remaining potential in the existing Basin Dakota completion, we also believe that it is reasonable that the Dakota be produced in conjunction with our efforts to produce the Otero Gallup pool. Commingling of these two pools is common in the general area and Conoco, Inc. has been authorized to downhole commingle the Otero Gallup and Basin Dakota in several of their wells, two of which offset our acreage to the north, since 1976 (NMOCD Order R-5205 dated April 27, 1976). A copy of this order is presented in Attachment D.

Attachment E is a plat of the area on which we have identified the Dakota and Gallup spacing units for the Jicarilla Otero Com No. 1 as well as the ownership of all offsetting leases. The Basin Dakota spacing unit comprises the South half of the section and consists of 320 acres, 160 acres being Dugan Production Corp's Jicarilla Contract No. 12 and 160 acres Amerada Hess' Jicarilla

Contract No. 13. The royalty for both leases is 12-1/2% and is held by the Jicarilla Indian Tribe. The proposed spacing unit for the Otero Gallup comprises the SW/4 SW/4 of the section and consists of 40 acres on Dugan Production's Jicarilla Contract No. 12. You will note that all acreage within this general area is within the boundaries of the Jicarilla Indian reservation. As mentioned earlier, two of the Conoco wells offsetting the subject well to the north (the NE Haynes No. 5 and No. 4) have previously been commingled downhole in a manner similar to that proposed by Dugan Production for our Jicarilla Otero Com No. 1.

Since the Gallup interval has not yet been completed in the subject well, the productivity from the Gallup is not known, however, with reference to Attachment C, we have presented production data for eight wells within a one mile radius of our well that have produced or have attempted a completion in the Otero Gallup interval. For the purposes of our application, Dugan's Jicarilla Otero Wells No. 4 and 5 were utilized as a basis for establishing production potential in the Gallup interval. Both wells have production histories in excess of six years and a cumulative production of 32,848 and 41,326 BO, respectively. Since the Jicarilla Otero No. 4 directly offsets the Jicarilla Otero Com No. 1 to the south, production performance from this well was used as a base for the proposed recompletion. The production history for the Jicarilla Otero No. 4 well is presented on page 8 of Attachment C. Based upon a standard decline curve analysis (considering exponential decline), our estimate of recoveries to be expected from the Jicarilla Otero Com. No. 1 is summarized as follows:

	<u>0i1</u>	<u>Gas</u>
Gallup	51,600 bbls (99.6%)	230,000 MCF (91.6%)
Dakota	<u>200 bbls</u> (0.4%)	<u>21,100 MCF</u> (8.4%)
Total	51,800 bbls	251,100 MCF

Based upon the anticipated production for the Gallup recompletion determined by drawing an analogy to the Jicarilla Otero No. 4 (Attachment C, page 8) and the anticipated production from the Dakota completion (Attachment B), the initial production anticipated for the commingled stream is summarized as follows:

	<u>011</u>	Gas
Gallup	26.00 BOPD (99.4%)	44 MCFD (80%)
Dakota	<u>0.17 BOPD</u> (0.6%)	<u>11 MCFD</u> (20%)
Total	26.17 BOPD	55 MCFD

Since the Gallup interval has not been completed, we would expect the bottom hole pressure to be in the range of approximately 2000 psi initially, however, based upon our analysis of production performance of the offset Gallup completions, we anticipate that due to the low permeability of the Gallup formation, the initial

pressure will drop fairly rapidly since we plan to maintain the operating bottom hole pressure (OBHP) in the Gallup at We plan to pump the well from 6680' and approximately 45 psi. anticipate that we will be able to pump the well off, maintaining an operating pressure of approximately 150 psi at the pump. This will allow the operating BHP in the Gallup to be approximately 45 psi at a mid perf depth of 5625' and the OBHP for the Dakota to be 155 psi at a mid perf depth of 6696'. In addition to being able to maintain a low operating BHP because of the low permeability of the Gallup we are confident that during periods of shut-in, the shut-in reservoir pressure will be slow to build up which will further serve to minimize any crossflow potential that might exist. We would expect down time to be minimal and will work diligently to insure minimal shut-in time on the Jicarilla Otero Com No. 1. It should be noted that the shut-in reservoir pressure in other Gallup completions on the Jicarilla Otero lease is calculated to be in the range of 500-600 psi based upon shut-in fluid level Thus, we are confident that upon installing a rod measurements. pump in the subject well, we will be able to maintain an operating BHP in the Gallup that will be compatible with the current BHP in the Dakota formation which is calculated to be 635 psi at a midperf datum of 6696' based upon a shut-in wellhead pressure of 522 psi measured on March 17, 1991. Thus, as a result of pressure depletion in the Dakota and low productivity in the Gallup, Dugan Production believes that cross-flow between formations will be minimal.

Based upon our knowledge of the fluid characteristics from each zone, we are not aware of any incompatibility that will result from the mixing of fluids from the Dakota and Gallup formations. Again, it should be stressed that downhole commingling of these formations is common in this general area. Based upon our position that the Dakota formation is at or near its economic limit, the proposed downhole commingling will allow for continued production of the Dakota formation and any production that results from this continued production will result in the recovery of reserves that will not otherwise be recovered from the subject well. Thus, we anticipate that a minimum of 21,100 MCF + 200 BO can be considered increased recovery should the NMOCD permit the downhole as commingling in the Jicarilla Otero Com No. 1. Should the proposed commingling not be authorized, it is likely that the reserves in the Dakota will never be recovered.

Based upon the fact that a stabilized production has not been established for the Gallup formation, and considering that for the first 3-4 years production decline will be more rapid in the newly completed Gallup than in the Dakota, it is proposed that the commingled production be allocated between the formations based upon our estimate of ultimate recovery from the well and as summarized above. The commingled production should be split as

follows:

	<u>0il</u>	<u>Gas</u>
Gallup	998	928
Dakota	1%	88

By copy of this application, we are notifying the offset operators as well as the Bureau of Land Management. Please note that only three operators are actually involved, two of which (Dugan Production Corp. and Amerada Hess Corp.) are working interest owners in the subject well, and the third (Conoco, Inc.) operates offset wells that have been previously authorized for downhole commingling.

In summary, Dugan Production respectfully requests administrative approval to downhole commingle production from the Otero Gallup and Basin Dakota formations in a manner that is commonly done in offset The working interest and royalty interest in both wells. formations is common. There are two leases involved, however, the royalty under each lease is owned by the Jicarilla Indian Tribe and the royalty rate for each lease is the same. There are no overriding royalty burdens on either lease. Even though the spacing is dissimilar for the Gallup and Dakota formations, the working interest ownership in the Gallup and Dakota has been pooled and is subject to an existing operating agreement. As mentioned earlier, both working interest owner parties in the subject well have approved the proposed recompletion as presented on Attachment Thus, the working interest and royalty interest dispersement Α. for the Jicarilla Otero Com No. 1 will be the same irregardless of whether production is from the Gallup or the Dakota.

Should you have any questions regarding this proposal or our application, please feel free to contact me.

Sincerely,

Jahn & Roe

John D. Roe Manager of Engineering

JDR/cg

cc: Amerada Hess Corp. Conoco, Inc. Bureau of Land Management, Farmington New Mexico Oil Conservation Division, Aztec

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dugan production corp.

REQUEST AUTHORIZATION FOR EXPENDITURE To Complete Otero Gallup, and Downhole Commingle with Basin Dakota JICARILLA OTERO COM NO. 1 SWSW, Section 22, T-24N, R-5W, NMPM Rio Arriba County, New Mexico

Expenditure Estimate

____ dp ≡

\$12,000
31,500
1,800
5,600
5,000
43,100
3,400
1,000
3,200
\$106,600

Reason for Expenditure:

Production from the current Basin Dakota completion is averaging 12.5 MCFD + 0.14 BC/D. It is proposed that the Otero Gallup interval be completed, downhole commingled with the Basin Dakota and rod pump equipment installed. Based upon an initial rate of 20 BOPD + 48 MCFD from the Gallup, this expenditure will payout in 1.5 years at \$16.00/BO + \$1.50/MCF.

OPERATOR APPROVAL Dugan Production Corp. By:	Date <u>2-6-91</u>
WORKING INTEREST APPROVAL	
Company:AMERADA HESS CORPORATION	
By: Rumullis	Date 3.19.91



Athachmert C Ps #1 al 8 OTERO GALLUP PRODUCTION SUMMARY All Wells Within 1 Mile Radius Dugan Production Corp's Jicarilla Otero Com #1 M-22-T24N-R5W

Operator & Well	Location	3 Mon B	th Ave OPD +	<u>BWPD</u>	oduction* + <u>MCFD</u>	Cum. Prod BO +	• 1-1-91 <u>MCF</u>
Conoco - NE Haynes #5	E-22-24N-5W		SI Sin	ce 8/89		42,228 +	250,320
Conoco - NE Haynes #9	A-21-24N-5W		0.8	0.2	20.7	41,265 +	268,863
Conoco - NE Haynes #10	G-21-24N-5W		1.0	-0-	23.5	38,180 +	268,312
Dugan - Jicarilla Otero #1	K-21-24N-5W		1.8	0.3	7.4	7,136 +	14,781
Dugan - Jicarilla Otero #5	C-28-24N-5W		3.4	0.5	11.4	41,326 +	103,570
Dugan - Jicarilla Otero #2	G-28-24N-5W		5.1	1.0	8.9	9,574 +	13,275
Dugan - Jicarilla Otero #4	D-27-24N-5W		9.7	1.0	40.0	32,848 +	88,246
Amerada - Jicarilla C #2 B-2	7-24N-5W	P&A	Upon	Com	ď	0	0
7 Well Average			3.1	0.14	16.0	30,365 +	143,910

Complete production history presented * -Most recent 3 months available - Conoco's is October, November & December 1990; Dugan Production's is December 1990, January & February 1991. Complete production history pred on attached plots for each well.















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BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO	-2- Case No. 5552 Octor No. 9-5308
IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSTRVATION CALLED BY THE OIL CONSTRVATION COMMISSION OF NEW REVICO FOR THE PURPOSE OF CONSIDERING:	(6) That the proposed corringling may result in the recovery of additional hydrocarbons from each of the subject pools, there- by preventing waste, and will not violate correlative rights.
CASE NO. 5652 Order No. R-5205	(7) That the reservoir characteristics of each of the subject zones are such that underground waste would not be caused by the proposed commingling provided that the wells are not shut-
XPELICATION OF CONTINENTAL OIL COMPANY FOR DOWNHOLE COMMINGLING, RIO ARAIRA COUNTY, NEW MEXICO.	in for an extended period. (8) That to afford the Commission the opportunity to assess the potential for waste and to expeditiously order appropriate
OFDER OF THE COMMISSION	remeatal action, the operator should notify the Azter district office of the Commission any time the subject wells are shut-in for 7 consecutive days.
BY THE CONTISSION This cause came on for hearing at 9 a.m. on April 14, 1975, at Santa 7e, New Mexico, before Examinar, Daniel S. Mutter.	(9) That in order to allocate the commingled production to each of the commingled zones in each of the subject wells, 75 percent of the commingled oil production and 15 percent of the commingled are production shifts and to the Gallup zone.
Now, on this 27th day of April, 1976, the Commission, a quorum teing present, having considered the testimony, the record, and the recormendations of the Examiner, and being fully advised in the premises.	and 25 percent of the commingled oil production and 85 percent of the commingled gas production to the Dakota zone. IT IS THEREFORE ORDERED:
FINDS: (1) That due public notice having been given as required by law, the Connission has jurisdiction of this cause and the subject matter thereof.	(1) That the applicant, Continental Oil Company, is hereby authorized to commingle Basin-Dakota gas and Otero-Gallup oil production within the wellbore of the following wells on its Northeast Haynes Lease in <u>Tourship 21 North, Rance 5 Nest, Ny</u> PM, Rio Arriba County, New Mexico:
(2) That the applicant, Continental Oil Company, is the owner and operator of the following wells on its Northeast Raynes Lease in Township 24 North, Range 5 West, NNPM, Rio Arriba County, New Mexicos	<pre>No. 1 in Unit L of Section 9 No. 2 in Unit D of Section 16 No. 3 in Unit P of Section 16 No. 4 in Unit E of Section 21 Up. 5 in Unit E of Section 22</pre>
Ko. I in Unit L of Section 9 Xo. 2 in Unit D of Section 16 No. 3 in Unit P of Section 16 1	No. 7 in Unit D of Section 15 No. 7 in Unit L of Section 10 No. 8 in Unit P of Section 15
No. 4 in Unit E of Section 21 No. 5 in Unit E of Section 22 No. 6 in Unit D of Section 15 No. 7 in Unit L of Section 10 No. 8 in Unit P of Section 15	(2) That in each of the aforesaid wells, 75 percent of the commingled oil production and 15 percent of the commingled gas production shall be allocated to the Gallup zone and 25 percent of the commingled oil production and 85 percent of the commingled gas production shall be allocated to the Dakota zone.
(3) That the applicant seeks authority to comingle Basin- Dekota gas and Otero-Gallup oil production within the wellbore of the above-described wells.	(3) That the operator of the subject wells shall immediately notify the Commission's Artec district office any time the wells have been shut-in for 7 consecutive days and shall concurrently
(4) That from the Basin-Dakota zone, the subject wells are capable of low marginal production only.	present, to the Commission a plan for remedial action. (4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.
(5) That from the Otero-Callup runs we wanted to capable of low marginal production only.	
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-3-Case No. 5652 Order No. R-52**05**

DONE at Santa Fe, New Mexico, on the day and year herein-above designated.

STATE OF NEW NEXICO OIL CONSERVATION COMMISSION

PHIL R. LUCERO, CHAITMAN G G

DOE D. RWELY, Nepter & Secretary ENTRY C. ARIOLD RELIDER

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STATE OF NEW MEXICO

ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE

1000 RIO BRAZOS ROAD AZTEC, NEW MEXICO 87410 (505) 334-6178

4/19/90 Date:

Oil Conservation Division P.O. Box 2088 Santa Fe, NM 87504-2088

RE:	Proposed	MC
	Proposed	NSL
	Proposed	WFX
	Proposed	NSP

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Gentlemen:

I have	examined the	application	received on	3/28/91
for the	Duga	fric	Otro Con	~ [#] 1
	U OPE	ERATOR (/	LEA	SE & WELL NO.

_____and my recommendations are as follows:

Yours truly,

OIL CONSERV '91 APR 23 AM 10 26 A LON DIVISION