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Southern Rockies Business Unit-

May 17, 1995

Mr. William J. LeMay, Director New Mexico Oil Conservation Division 2040 S. Pacheco Street P. O. Box 6429 Santa Fe, NM 87505

Application for Exception to Rule 303-A **Downhole Commingling** Jicarilla Contract 146 #22 Well 830' FNL, 860' FEL, Unit A Section 10-T25N-R5W Basin Dakota and South Blanco Pictured Cliffs Pools Rio Arriba County, New Mexico

Amoco Production Company hereby requests administrative approval to downhole commingle production from the Basin Dakota and South Blanco Pictured Cliffs Pools in the Jicarilla Contract 146 #22 well referenced above. The Jicarilla Contract 146 #22 well was originally a multiple completion in the Dakota and Pictured Cliffs formations. This well has a marginal Pictured Cliffs zone that if left as a dual completion, the marginal zone would be shut-in in the near future. We plan to complete the well with both the Dakota and Pictured Cliffs formations being downhole commingled in the wellbore. The two zones are expected to produce at a total commingled rate of about 175 MCFD with 4 BOPD. The ownership (WI, RI) of these pools is identical in this wellbore. Downhole commingling will offer an economical method of production while protecting against reservoir damage, waste of reserves and violation of correlative rights. Offset operators to this well will receive a copy of this application by certified mail.

The allocation method that we plan to use for this commingled well is as follows. Since these formations have been producing as a dual completion in this wellbore for some time, we have a good historical representation of the production by formation. Based on historical production we recommend that the allocation for gas production be 68% of the gas production to the Dakota formation and 32% of the gas production to the Pictured Cliffs formation. We recommend that 100% of the liquid production be attributed to the Dakota formation as the Pictured Cliffs formation has not historically produced liquids in this well. The actual commercial value of the commingled production will not be less than the sum of the values of the production from each of the common sources of supply.

Attached to aid in your review are plats showing the location of the well and offset wells in the same formation, a historical and recent production plot and a C-102 for each formation. This spacing unit is located on a federal lease and we will send a copy of the application to the BLM requesting their consent. Should you have questions concerning this matter, please contact me at (303) 830-5344.

Sincerelly,

Pamela W. Staley

Enclosures

cc: Steve Smethie

Patty Haefele

Frank Chavez, Supervisor

NMOCD District III

1000 Rio Brazos Road

Aztec, NM 87410

Duane Spencer

Bureau of Land Management

1235 La Plata Hwy

Farmington, NM 87401

Application for Exception to Rule 303: SEGREGATION OF PRODUCTION FROM POOLS

Requirements

(1) Name and address of the operator:

Amoco Production Company P.O. Box 800 Denver, CO 80201

(2) Lease name, well number, well location, name of the pools to be commingled:

Lease Name:

Jicarilla Contract 146

Well Number:

22

Well Location:

830' FNL, 860' FEL

Unit A Section 10-T25N-R5W Rio Arriba County, New Mexico

Pools Commingled:

South Blanco Pictured Cliffs

Basin Dakota

(3) A plat of the area showing the acreage dedicated to the well and the ownership of all offsetting leases.

Attached

(4) A current (within 30 days) 24-hour productivity test on Division Form C-116 showing the amount of oil, gas and water produced from each zone.

The Basin Dakota produced an average stabilized rate of 65 MCFD and 0.1 BCPD. The South Blanco Pictured Cliffs zone produced at an average rate of about 30 MCFD and 0 BCPD.

(5) A production decline curve for both zones showing that for a period of at least one year a steady rate of decline has been established for each zone which will permit a reasonable allocation of the commingled production to each zone for statistical purposes.

South Blanco Pictured Cliffs Completion:

Historical production curve attached.

Basin Dakota Completion:

Historical production curve attached.

(6) Estimated bottomhole pressure for each zone. A current (within 30 days) measured bottom hole pressure for each zone capable of flowing.

Bottomhole pressures were estimated from 24 hour bottomhole shut-in pressures in the Pictured Cliffs and Dakota formations in the Jicarilla field. Estimated bottomhole pressure in the Pictured Cliffs formation is 450 PSI while the estimated bottomhole pressure in the Dakota is 900 PSI.

(7) A description of the fluid characteristics of each zone showing that the fluids will not be incompatible in the wellhore.

The fluids have no abnormal components that would prohibit commingling, or promote the creation of emulsions or scale. Amoco has applied for and received several downhole commingling orders in this area including wells in which these two formations have been successfully downhole commingled with no apparent incompatibility in the commingled fluids.

(8) A computation showing that the value of the commingled production will not be less than the sum of the values of the individual streams:

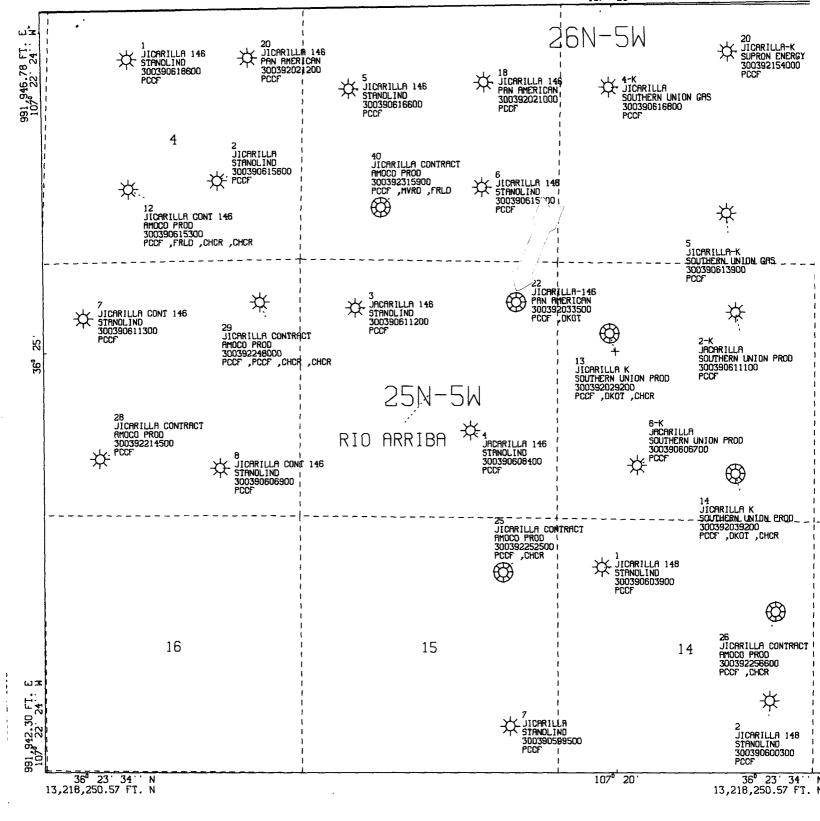
Since the BTU content of the produced fluids are very similar, we would expect the commingled production to have the same value as the sum of the individual streams.

(9) A formula for the allocation of production to each of the commingled zones and a description of the factors or data used in determining such formula:

Based on historical production we recommend that the allocation for gas production be 68% of the gas production to the Dakota formation and 32% of the gas production to the Pictured Cliffs formation. We recommend that 100% of the liquid production be attributed to the Dakota formation as the Pictured Cliffs formation has not historically produced liquids in this well.

(10) A statement that all offset operators and, in the case of a well on federal land, the United States Bureau of Land Management, have been notified in writing of the proposed commingling.

BLM will receive a copy of this application by certified mail. The offsetting operators listed on the attached sheet will receive a copy of this application by certified mail.

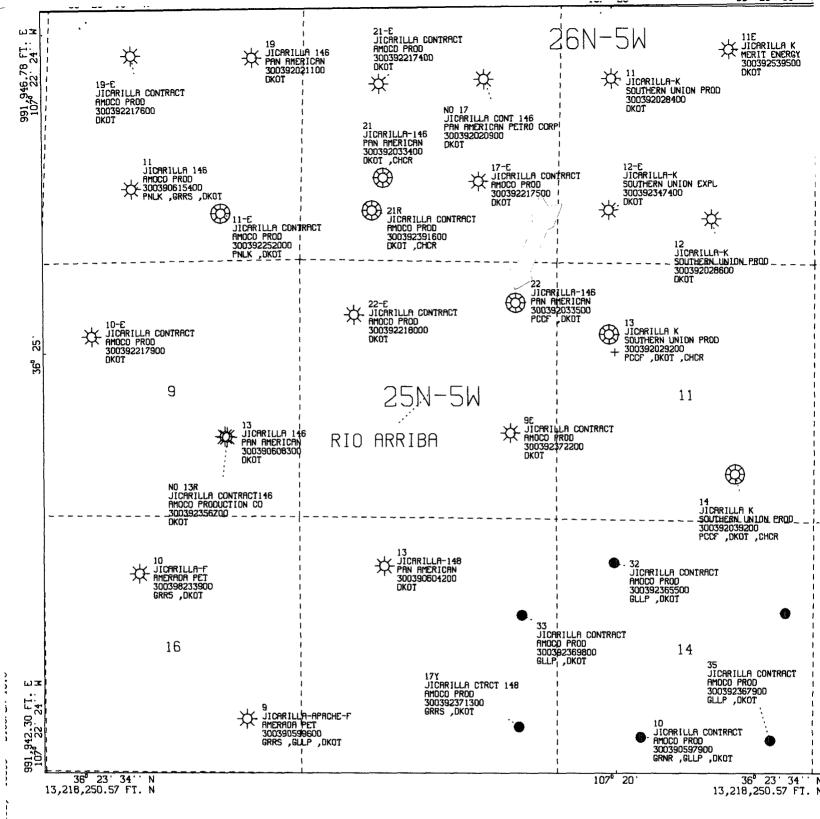


All geological and geophysical data, including the interpretation thereof, appearing on this map is the private and confidential property of Amoco Production Company. The publication or reproduction thereof without the written permission of said Company is strictly prohibited.

POLYCONIC CENTRAL MERIDIAN - $107^{\rm o}$ 20' 46'' W LON SPHEROID - 6

AMOCO PRODUCTION COMPANY
PLAT MAP
Jicarilla Contract 146 #22
Pictured Cliffs

SCALE 1 IN. = 2,000 FT. MAY 11, 1995

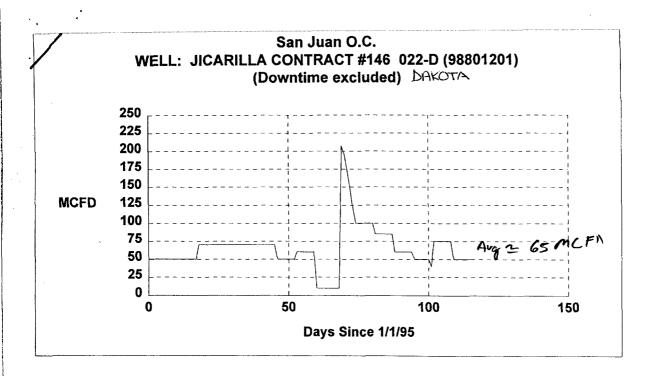


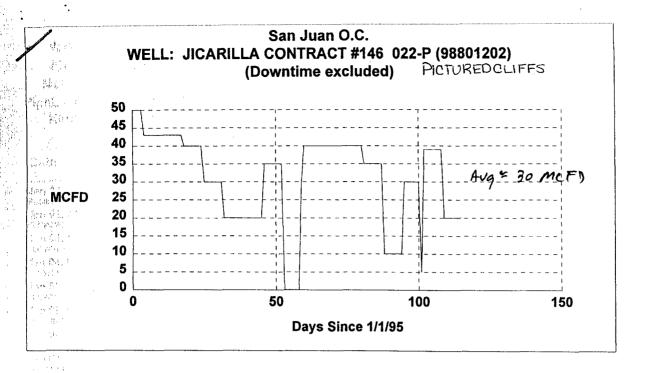
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POLYCONIC CENTRAL MERIDIAN - 107° 20' 46'' W LON SPHEROID - 6

AMOCO PRODUCTION COMPANY PLAT MAP Jicarilla Contract 146 #22 Dakota

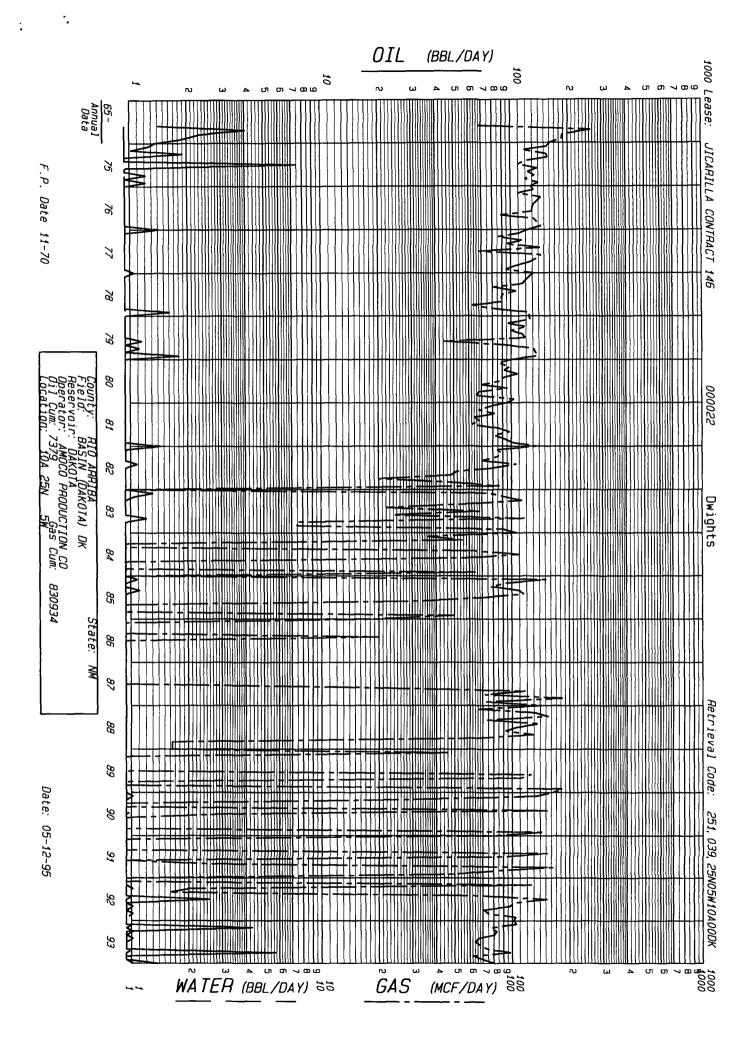
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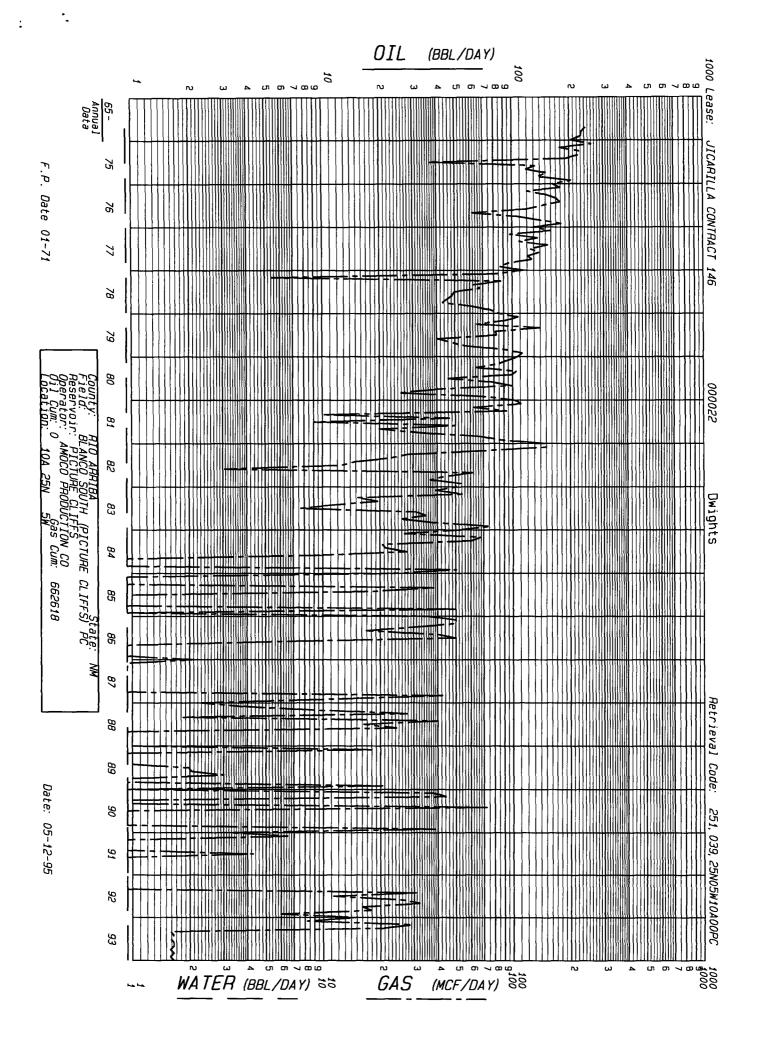




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Form C-102 Supersedes C-128 Effective 1-1-65

All distances must be from the outer boundaries of the Section. Well No. Operator Jicarilla Contract 146 Pan American Petroleum Corp. Unit Letter 25N 5W Rio Arriba Actual Footage Location of Wells leet from the North 860 *** 830 East line and leet from the Ground Level Elev. Dedicated Acreages Producing Formation 'N/2 Pool 320 6671' (Ungraded Dakota Basin Dakota Acres 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling. etc? If answer is "yes;" type of consolidation If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.). No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commis-CERTIFICATION I hereby certify that the information contained herein is true and complete to the 860 G. W. Eaton, Jr Area Engineer Company PAN AMERICAN PETROLEUM CORP. August 3, 1970 10 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 knowledge and belief. Date Surveyed July 30, 1970 Registered Protessiand Engineer Fred B. Kerr Jr. Certificate No.

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Form C+102 Supersedes C-128
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LIST OF ADDRESSES FOR OFFSET OPERATORS Jicarilla Contract 146 #22

Merit Energy Corp.12221 Merit Drive, Suite 500Dallas, Texas 75251