| DATE | -2/20/97 | USPERISE LOGGED KV TYPE DHC | |
|-------|------------------|--|--|
| | | ABOVE THIS LINE FOR DIVISION USE ONLY | |
| | | NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - | |
| | | ADMINISTRATIVE APPLICATION COVERSHEET | |
| | THIS COVERSH | ET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS | |
| Appli | cation Acronyms | [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] | |
| | [PC-P | [NGF-Non-Standard Foration Onit] [NGF-Non-Standard Eccution] [DD-Directional Drilling] [SD-Simultaneous Dedication] nhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] ol Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] lified Enhanced Oil Recovery Certification] [PPR-Positive Production Response] | |
| | | DEGELVED | |
| [1] | TYPE OF A [A] | PLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Directional Drilling NSL NSP DD SD | |
| | Check | One Only for [B] and [C] | |
| | [B] | Commingling - Storage - Measurement | |
| | [C] | Injection - Disposal - Pressure Increase - Enhanced Oil Recovery | |
| [2] | NOTIFICAT [A] | ION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners | |
| | [B] | Offset Operators, Leaseholders or Surface Owner | |
| | [C] | Application is One Which Requires Published Legal Notice | |
| | [D] | Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office | |
| | [E] | General of the above, Proof of Notification or Publication is Attached, and/or, | |
| | [F] | U Waivers are Attached | |

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

| Peggy Bradfield | Som Stern fued | Regulatory/Compliance Administrator | 2-14-97 |
|--------------------|----------------|-------------------------------------|---------|
| Print or Type Name | (Signature | Title | Date |



SAN JUAN DIVISION

February 18, 1997

SENT FEDERAL EXPRESS

Mr. William LeMay New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Re: San Juan 27-5 Unit #111M 1490'FSL, 800'FEL Section 2, T-27-N, R-5-W, Rio Arriba County, NM API #30-039-25598

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota pools in the subject well. This well is a new Mesa Verde/Dakota well that is being drilled and completed in 1997.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas Company is submitting the following for your approval of this commingling:

- 1. Form G107A Application for Downhole Commingling;
- 2. C-102 plat for each zone showing its spacing unit and acreage dedication;
- 3. Expected production curves;
- 4. Notification list of offset operators Burlington is the offset operator;
- 5. Shut in wellhead pressure and calculated down hole pressure;
- 6. Nine-section plats for the Mesa Verde and Dakota.

Notification of Mesa Verde and Dakota interest owners is covered under Reference Order #R-10694 issued November 12, 1996 attached.

We will consult with the Supervisor of the Aztec District Office of the New Mexico Oil Conservation Division to establish an allocation formula.

Please let me know if you require additional data.

Sincerely. Jeany Graanied

Peggy Bradfield Regulatory/Compliance Administrator

xc: Bureau of Land Management State Land Office **DISTRICT I** P.O. Box 1980, Hobbs, NM 88241-1980 **DISTRICT II** 811 South First St., Artesia, NM 88210-2835 **DISTRICT III** 1000 Rio Brazos Rd, Aztec, NM 87410-1693

State of New Mexico Energy, Minerals and Natural Resources Department **OIL CONSERVATION DIVISION** 2040 S. Pacheco Santa Fe, New Mexico 87505-6429

Form C-107-A New 3-12-96 **APPROVAL PROCESS : EXISTING WELLBORE**

APPLICATION FOR DOWNHOLE COMMINGLING

| | PO BOX 4289 FARMING | GTON, NM 87499 | |
|---|--|--|---|
| SAN JUAN 27-5 UNIT Lease DGRID NO014538 Property C | <u>1-02 -271</u> Well No. Unit L | <mark>N-5W</mark> tr Sec - Twp - Rge Spacing | RIO ARRIBA County Unit Lease Types: (check 1 or more) _, State <u>X</u> , (and/or) Fee |
| The following facts are submitted in support of downhole commingling: | Upper Zone | Intermediate Zone | Lower Zone |
| 1. Pool Name and Pool Code | BLANCO MESAVERDE - 72319 | | BASIN DAKOTA - 71599 |
| 2. Top and Bottom of Pay Section (Perforations) | WILL BE SUPPLIED UPON COMPLETION | | WILL BE SUPPLIED UPON COMPLETION |
| 3. Type of production (Oil or Gas) | GAS | | GAS |
| 4. Method of Production (Flowing or Artificial Lift) | FLOWING | | FLOWING |
| 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current | (Current) a. 742 psi (see attachment) | a. | a. 838 psi (see attachment) |
| Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original | (Original) b. 1340 psi (see attachment) | b. | b. 3096 psi (see attachment) |
| 6. Oil Gravity ([°] API) or Gas BTU Content | BTU 1163 | | BTU 1099 |
| 7. Producing or Shut-In? | SHUT - IN | | SHUT - IN |
| Production Marginal? (yes or no) | NO | | YES |
| * If Shut-In and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to attach production | Date: N/A Rates: | Date: Rates: | Date: N/A Rates: |

* If Producing, give data and oil/gas/water water of recent test (within 60 days) Rates: Rates: Rates: 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Gas: % Gas: % Gas: % Oil: Oil: Oil: % % % WILL BE SUPPLIED UPON COMPLETION WILL BE SUPPLIED UPON COMPLETION

9. If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data.

Date:

10. Are all working, overriding, and royalty interests identical in all commingled zones? If not, have all working, overriding, and royalty interests been notified by certified mail? Have all offset operators been given written notice of the proposed downhole commingling?

Date: N/A

11. Will cross-flow occur? _X Yes ___ No If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. _X__ Yes ____No (If No, attach explanation)

12. Are all produced fluids from all commingled zones compatible with each other? _X_ Yes ___ No

13. Will the value of production be decreased by commingling? ___ Yes _X_ No (If Yes, attach explanation)

14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. _X_Yes ____No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). Reference Order R-10694 attached

16. ATTACHMENTS:
* C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
* Production curve for each zone for at least one year. (If not available, attach explanation.)
* For zones with no production history, estimated production rates and supporting data.
* Data to support allocation method or formula.
* Notification list of all offset operators.
* Notification list of working, overriding, and royalty interests for uncommon interest cases.
* Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

| SIGNATURE: | |
|---|--|
| TYPE OR PRINT NAME <u>James A. Smith</u> TELEPHONE NO. (<u>505</u>) <u>326-9700</u> | |

___Yes _X__No ___Yes _X__No _X_Yes ___No

Date: N/A

X Administrative Hearing

___YES _X__NO

District (PO Box 1980, Hubbs, NM 88241-1980 District (I PO Drawer OD, Artesis, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztee, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088

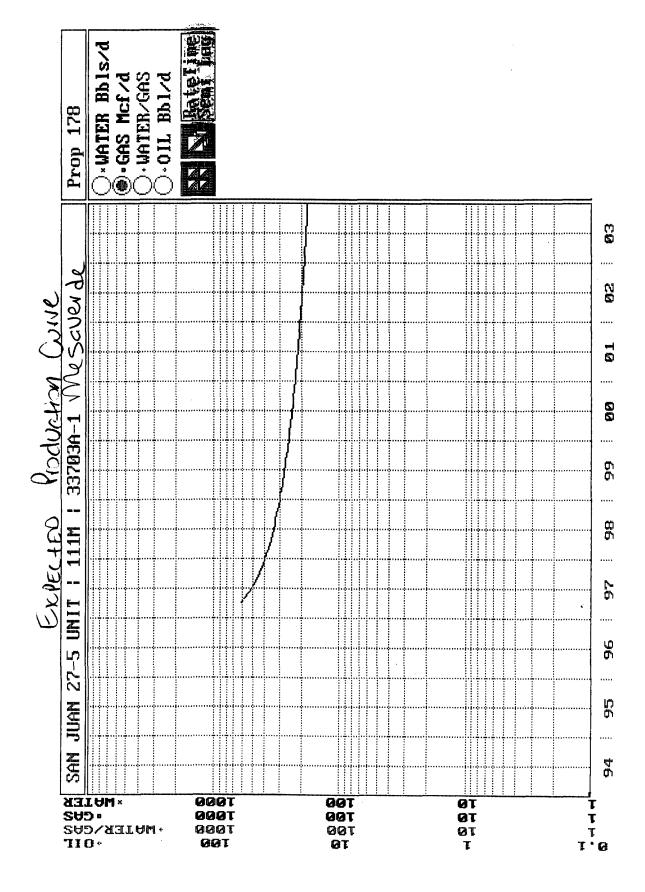
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State of New Mexico Energy, Minerais & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-102 Revised February 21, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

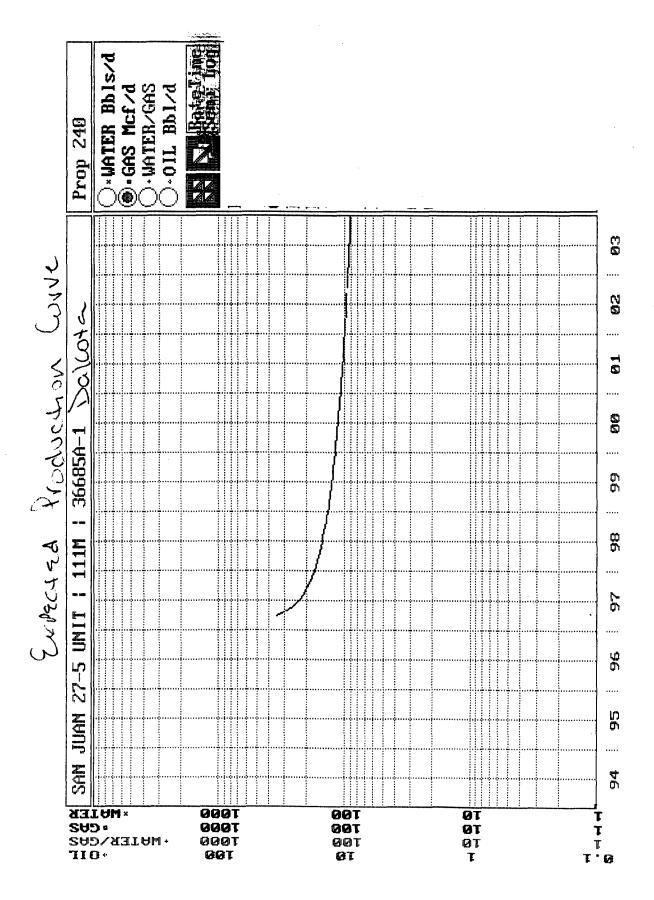
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| 30-039- 72319/71599 Blanco Mesaverde, | | | | | | | e/Basir | 1 Dako | ota | | | |
| • Property Code • Property Name 7454 San Juan 27-5 Unit | | | | | | | | | | | • | Well Number 111M |
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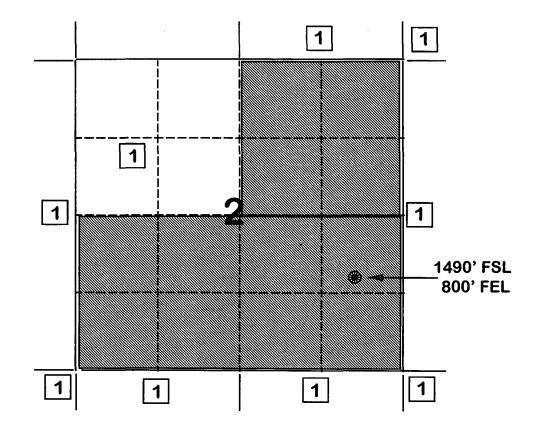
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #111M OFFSET OPERATOR \ OWNER PLAT

Mesaverde (E/2)/Dakota (S/2) Formations Commingle Well

Township 27 North, Range 5 West



1) Burlington Resources Oil and Gas Company

BHPMVORG.XLS

FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD VERSION 1.0 3/13/94

| GAS GRAVITY | 0.672 |
|--------------------------------|--------|
| COND. OR MISC. (C/M) | C |
| %N2 | 0.28 |
| %CO2 | 0.32 |
| %H2S | 0 |
| DIAMETER (IN) | 2 |
| DEPTH (FT) | 6663 |
| SURFACE TEMPERATURE (DEG F) | 60 |
| BOTTOMHOLE TEMPERATURE (DEG F) | 150 |
| FLOWRATE (MCFPD) | 0 |
| SURFACE PRESSURE (PSIA) | 1120 |
| BOTTOMHOLE PRESSURE (PSIA) | 1339.9 |

SAN JUAN 27-5 UNIT #30 MESAVERDE - ORIGINAL

FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD VERSION 1.0 3/13/94

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| GAS GRAVITY | 0.672 |
|--------------------------------|-------|
| COND. OR MISC. (C/M) | C |
| %N2 | 0.28 |
| %CO2 | 0.32 |
| %H2S | 0 |
| DIAMETER (IN) | 2 |
| DEPTH (FT) | 6663 |
| SURFACE TEMPERATURE (DEG F) | 60 |
| BOTTOMHOLE TEMPERATURE (DEG F) | 150 |
| FLOWRATE (MCFPD) | 0 |
| SURFACE PRESSURE (PSIA) | 629 |
| BOTTOMHOLE PRESSURE (PSIA) | 742.2 |

SAN JUAN 27-5 UNIT #30 MESAVERDE - CURRENT

Page No.: 1 Print Time: Mon Jan 27 12:56:07 1997 Property ID: 3841 Property Name: SAN JUAN 27-5 UNIT | 30 | 53360B-1 SJ 27-5 #11)M Table Name: K:\ARIES\RR97PDP\TEST.DBF MV Offset

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| 12/06/58 | 22000 | 802.0 | |
| 06/14/59 | 36000 | 746.0 | |
| 09/22/60 | 70000 | 642.0 | |
| 06/13/61 | 86000 | 628.0 | |
| 12/28/62 | 110000 | 600.0 | |
| 04/19/63 | 114000 | 609.0 | |
| 09/28/64 | 134000 | 614.0 | |
| 05/10/65 | 141000 | 609.0 | |
| 04/19/66 | 155000 | 567.0 | |
| 09/13/67 | 167000 | 549.0 | |
| 05/02/68 | 173000 | 571.0 | |
| 10/07/70 | 205070 | 499.0 | |
| 07/22/71 | 215076 | 447.0 | |
| 06/06/72 | 226148 | 448.0 | |
| 12/01/81 | 329528 | 353.0 | |
| 01/04/87 | 365606 | 405.0 | |
| 08/22/89 | 394408 | 512.0 | |
| 07/30/91 | 406566 | 629.0 | CURRENT |

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FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD VERSION 1.0 3/13/94

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| GAS GRAVITY | 0.643 |
|--------------------------------|----------|
| COND. OR MISC. (C/M) | <u> </u> |
| %N2 | 0.17 |
| %CO2 | 1.25 |
| %H2S | 0 |
| DIAMETER (IN) | 1.5 |
| DEPTH (FT) | 7774 |
| SURFACE TEMPERATURE (DEG F) | 60 |
| BOTTOMHOLE TEMPERATURE (DEG F) | 200 |
| FLOWRATE (MCFPD) | 0 |
| SURFACE PRESSURE (PSIA) | 2552 |
| | <u></u> |
| BOTTOMHOLE PRESSURE (PSIA) | 3095.8 |

SAN JUAN 27-5 UNIT #122 DAKOTA - ORIGINAL

BHPDKCUR.XLS

FLOWING AND STATIC BHP CULLENDER AND SMITH METHOD VERSION 1.0 3/13/94

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GAS GRAVITY 0.643 COND. OR MISC. (C/M) С 0.17 %N2 %CO2 1.25 %H2S 0 1.5 DIAMETER (IN) DEPTH (FT) 7774 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 200 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 703 BOTTOMHOLE PRESSURE (PSIA) 837.6

SAN JUAN 27-5 UNIT #122 DAKOTA - CURRENT

Page No.: 1 Print Time: Mon Jan 27 13:06:05 1997 Property ID: 1687 Property Name: SAN JUAN 27-5 UNIT | 122 | 52429A-1 SJ 27-5 # IIIM Table Name: K:\ARIES\RR97PDP\TEST.DBF Dakota off set

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| 07/23/71 | 0 | 2552.0 | ORIGINAL |
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| 11/27/71 | 46373 | 1589.0 | |
| 06/06/72 | 128000 | 1204.0 | |
| 09/18/72 | 153953 | 1291.0 | |
| 07/19/73 | 229539 | 1002.0 | |
| 05/22/75 | 387289 | 909.0 | |
| 07/06/77 | 537154 | 732.0 | |
| 05/01/79 | 650062 | 803.0 | |
| 05/04/81 | 766971 | 715.0 | |
| 09/13/83 | 865690 | 812.0 | |
| 05/20/85 | 930505 | 833.0 | |
| 07/12/88 | 1045529 | 1220.0 | |
| 05/29/90 | 1133561 | 831.0 | |
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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

CASE NO. 11626 ORDER NO. R-10694

APPLICATION OF BURLINGTON RESOURCES OIL & GAS COMPANY FOR THE ESTABLISHMENT OF A DOWNHOLE COMMINGLING "REFERENCE CASE" FOR ITS SAN JUAN 27-5 UNIT PURSUANT TO DIVISION RULE 303.E AND THE ADOPTION OF SPECIAL ADMINISTRATIVE RULES THEREFOR, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on October 17 and November 7, 1996, at Santa Fe, New Mexico, before Examiners David R. Catanach and Michael E. Stogner, respectively.

NOW, on this 12th day of November, 1996, the Division Director, having considered the testimony, the record and the recommendations of the Examiner, and being fully advised in the premises,

FINDS THAT:

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

(2) The applicant, Burlington Resources Oil & Gas Company (Burlington), pursuant to the provisions of Division Rule 303.E., seeks to establish a downhole commingling "reference case" to provide exceptions for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County, New Mexico.

(3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

- c) establish a "reference case" whereby the Division utilizes the data presented in the immediate case to endorse or approve certain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a certain method of allocating production on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit; and,
- d) establish a "reference case" or an administrative procedure for authorizing the downhole commingling of existing or future drilled wells within the San Juan 27-5 Unit without additional notice to each affected interest owner as required by Division Rule No. 303.D.

(7) In support of its request to except marginal economic criteria, the applicant presented geologic and engineering evidence and testimony which indicates that within the San Juan 27-5 Unit:

- a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent;
- b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 583 MMCFG and 426 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 MCFGD, respectively; and,
- d) the estimated ultimate gas recoveries and initial producing rates from the Dakota and Pictured Cliffs formations are insufficient to justify drilling stand alone wells and/or dually completed wells to recover such gas reserves.

(8) The evidence and testimony presented by the applicant indicates that the Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit should be properly classified as "marginal".

(9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- c) providing notice to each interest owner within the San Juan 27-5 Unit of subsequent downhole comminglings is unnecessary and is an excessive burden on the applicant;
- d) the downhole commingling of wells within the San Juan 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 27-5 Unit should not violate the correlative rights of any interest owner;
- e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for notice.

(14) An administrative procedure should be established within the San Juan 27-5 Unit for obtaining approval for subsequent downhole commingled wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are complied with.

(15) Approval of the proposed "reference cases" for marginal economic criteria, pressure criteria, allocation formulas and notice will lessen the burden on the applicant insofar as providing the data required pursuant to Division Rule No. 303.D. and Form C-107-A, will provide the applicant a streamlined method for obtaining downhole commingling approvals within the San Juan 27-5 Unit, and will not violate correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The application of Burlington Resources Oil & Gas Company to establish a "reference case" for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County, New Mexico, is hereby approved.