DATE IN	11.								
	4///97	4/21/97 B5 W BHC							
•	ABOVE THIS LINE FOR DIVISION USE ONLY								
	NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau -								
	ADMINISTRATIVE APPLICATION COVERSHEET								
	THIS COVERSHE	ET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS							
Applic	Application Acronyms: [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]								
[1]	TYPE OF A [A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Directional Drilling NSL NSP DD SD							
	Check [B]	Commingling - Storage - Measurement							
	[C]	• Injection - Disposal - Pressure Increase - Enhanced Oil Recovery I WFX I PMX I SWD I IPI EOR PPR							
[2]	NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply [A] Uvrking, Royalty or Overriding Royalty Interest Owners								
	[B] Ø Offset Operators, Leaseholders or Surface Owner								
	[C] Application is One Which Requires Published Legal Notice								
	[D] Votification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office								
	[E]	□ For all 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	Stadfield	Regulatory/Compliance Administrator
Print or Type Name	Signature	Title

3-31-97 Date



SAN JUAN DIVISION

March 31, 1997

SENT FEDERAL EXPRESS

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

Re: San Juan 28-6 Unit #186M 1510'FNL, 1015'FWL Section 6, T-27-N, R-6-W, Rio Arriba County, NM API #30-039-25615

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 C107A Application for Downhole Commingling;
- 2. C-102 plat for each zone showing its spacing unit and acreage dedication;
- 3. Expected production curve for the Mesa Verde and Dakota for at least year;
- 4. Notification list of offset operators;
- 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-10696 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,

Skanpull

Peggy Bradfield Regulatory/Compliance Administrator

encs.

District I PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088 State of New Mexico Energy, Minerals & 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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT ³ Pool Name API Number ¹ Pool Code 30-039-72319/71599 Blanco Mesaverde/Basin Dakota ' Property Code Property Name • Well Number San Juan 28-6 Unit 186M 7462 'OGRID No. ¹ Operator Name * Elevation 6145' BURLINGTON RESOURCES OIL & GAS COMPANY 14538 ¹⁰ Surface Location Section Towaship Range Feet from the North/South line Feet from the East/West line UL or lot no. Lot Ide County 1015 6-W 1510 North West R.A. Ε 6 27-N ¹¹ Bottom Hole Location If Different From Surface UL or lot no. Township Lot Ida Feet from the North/South line Feet from the Section Range East/West line County MV-W/314.1 15 Order No. DK-N/317.53 NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION 1222.32 1273.80 25 96.44' ¹⁷ OPERATOR CERTIFICATION 16 I hereby cerufy that the information con *C*o true and complete to the best of my knowledge and belief 4 0 2 1 m 0 5 m FEE FEE M had hered Signature 1015 4 \odot Peggy Ň SF-079051 Printed Na 80 SF-07905/ T Regulatory Administrator õe. 5 N Title -31-41 3 Dete ¹⁸SURVEYOR CERTIFICATION re certify that the we d from field notes of actual surveys a ter my supervision, and that the same is true as 6 Ð NM-03583 correct to the best of my belief. 00 11/07/96 SF-*2*0 00 Date of Survey 079404 0 685 2610.96 1305.48 1259.28

DISTRICT

. . .

P.Q. 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

APPLICATION FOR DOWNHOLE COMMINGLING

X Administrative ____Hearing **EXISTING WELLBORE**

APPROVAL PROCESS :

__YES ___X_NO

Form C-107-A New 3-12-96

Burlington Resources Oil &	Gas Company	PO Box 4289, Farmington, NM 87499		
Operator		Address		
San Juan 28-6 Unit	186M	E 06-27**-6	Rio Arriba	
Lease	Well No.	Unit Ltr Sec - Twp - Rge	County	
			Spacing Unit Lease Types: (check 1 or more)	

OGRID NO. 14538_____ Property Code __7462___ API_NO.___30-039-25615_

_Federal ___x___, State _____(and/or) Fee __X___

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 (Dil 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. 583 psi (see attachment)	а.	a. 745 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1265psi (see attachment)	b.	b. 3168 psi (see attachment)
6. Oil Gravity ([°] API) or Gas BTU Content	BTU 1187		BTU 1119
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 estimates and supporting data	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)	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: % % will be supplied upon completion	Oil: Gas: %	Oil: Gas: % % 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. Are all working, overriding, and rovalty interests identical in all co × .

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?	Yesx_No Yesx_No _X_YesNo
Have all offset operators been given written notice of the proposed downhole commingling?	_X_YesNo

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) 11. Will cross-flow occur?

12. Are all produced fluids from all commingled zones compatible with each other?

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

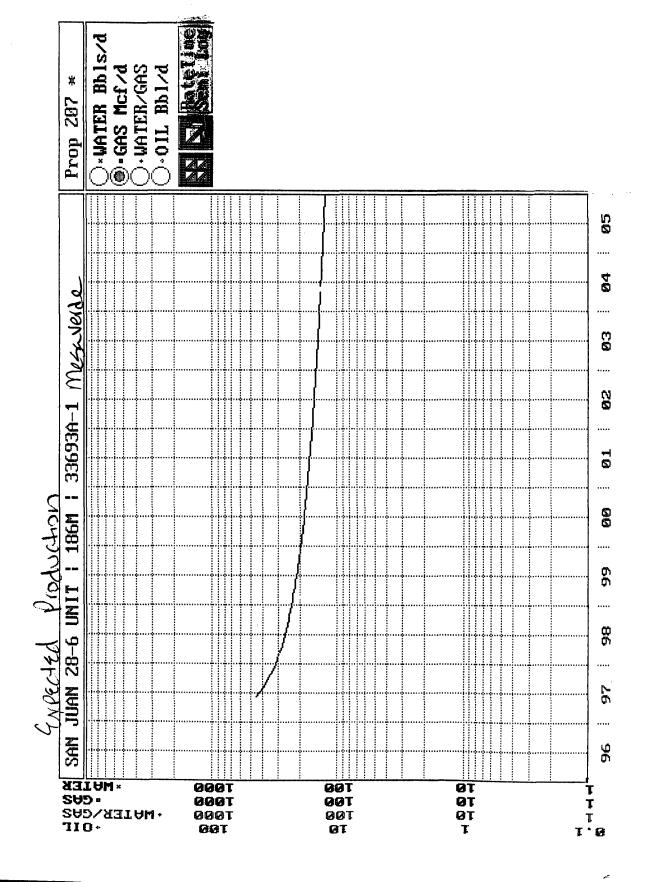
14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. _X_Yes ___ No

15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). ___Reference Order R-10696 attached_

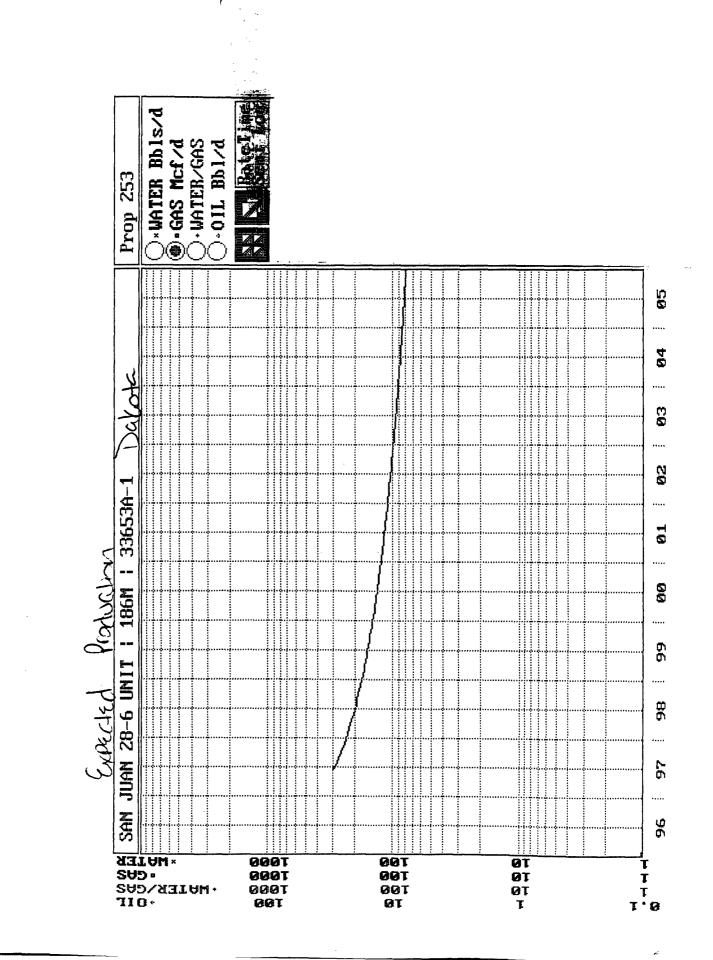
16. ATTACHMENTS:
16. ATTACHMENTS:
* C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
* Production curve for each zone for at least one year. (If not available, attach explanation.)
* For zones with no production history, estimated production rates and supporting data.
* 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 Lean Workerton	3/27/97
TYPE OR PRINT NAME <u>Sean Woolverton</u> TELEPHONE NO. (505) 326-9700	



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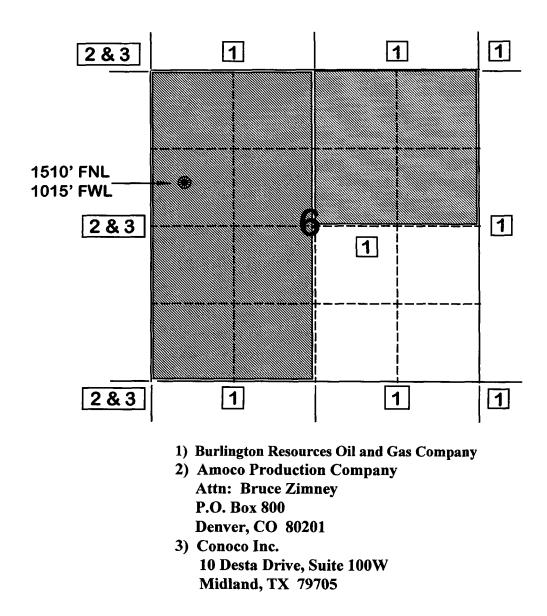
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-6 Unit #186M OFFSET OPERATOR \ OWNER PLAT

Mesaverde (W/2)/Dakota (N/2) Formations Commingle Well

Township 27 North, Range 6 West



BHPMVCUR.XLS

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

GAS GRAVITY 0.686 COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA)

С 0.41

1.03

5194

60

150

512

582.5

0

0

2

BOTTOMHOLE PRESSURE (PSIA)

SAN JUAN 28-6 UNIT #36 MESAVERDE - CURRENT

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

GAS GRAVITY	0.686
COND. OR MISC. (C/M)	C
%N2	0.41
%CO2	1.03
%H2S	0
DIAMETER (IN)	2
DEPTH (FT)	5194
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1097
BOTTOMHOLE PRESSURE (PSIA)	1264.6

SAN JUAN 28-6 UNIT #36 MESAVERDE - ORIGINAL

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

GAS GRAVITY	0.623
COND. OR MISC. (C/M) %N2	0.21
%CO2	1.08
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	7640
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	632
BOTTOMHOLE PRESSURE (PSIA)	745.0

SAN JUAN 28-6 UNIT #186 DAKOTA -CURRENT

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

GAS GRAVITY	0.623
COND. OR MISC. (C/M)	<u> </u>
%N2	0.21
%CO2	1.08
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	7640
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	2642
BOTTOMHOLE PRESSURE (PSIA)	3167.6

SAN JUAN 28-6 UNIT #186 DAKOTA -ORIGINAL

. Page No.: 1 Print Time: Thu Mar 27 07:16:39 1997 Property ID: 4011 Property Name: SAN JUAN 28-6 UNIT | 36 | 49403A-1 Mesaverde Offset Table Name: K:\ARIES\RR97PDP\TEST.DBF

--DATE-- ---CUM_GAS-- M_SIWHP

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09/06/58	533000	687.0
08/22/59	647000	642.0
05/22/60	725000	668.0
05/21/61	819000	654.0
09/10/62	927000	661.0
10/07/63	997000	634.0
02/12/64	1016000	663.0
01/29/65	1091000	652.0
07/27/66	1202000	609.0
01/27/67	1242000	600.0
02/15/68	1322000	587.0
08/04/69	1429000	565.0
06/12/70	1500741	540.0
05/14/71	1581653	497.0
07/03/72	1690980.	447.0
04/25/73	1762298	424.0
05/22/74	1857833	437.0
04/09/76	2003758	425.0
04/12/78	2151058	359.0
05/12/80	2278289	415.0
06/04/82	2389060	433.0
06/28/84	2464864	462.0
03/03/87	2545951	492.0
10/07/89	2623366	462.0
06/17/91	2672786	500.0
07/16/91	2674507	512.0 < Wrient

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09/23/74	175797	786.0
05/05/75	230900	714.0
07/05/77	360589	618.0
06/28/79	431295	597.0
07/13/81	517762	600.0
10/12/83	599158	659.0
06/27/85	660825	611.0
11/19/85	675946	1262.0
10/05/88	755986	692.0
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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. 11628 ORDER NO. R-10696

APPLICATION OF BURLINGTON RESOURCES OIL & GAS COMPANY FOR THE ESTABLISHMENT OF A DOWNHOLE COMMINGLING "REFERENCE CASE" FOR ITS SAN JUAN 28-6 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 28-6 Unit, San Juan County, New Mexico.

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

CASE NO. 11628 Order No. R-10696 Page -3-

- 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 28-6 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 28-6 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 28-6 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 449 MMCFG and 186 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 254 MCFGD and 216 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 28-6 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 28-6 Unit, the applicant presented engineering evidence and testimony which indicates that:

- c) providing notice to each interest owner within the San Juan 28-6 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 28-6 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-6 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 28-6 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 28-6 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 28-6 Unit, San Juan County, New Mexico, is hereby approved.