

SAN JUAN DIVISION

October 27, 1997

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Re: San Juan 29-7 Unit #520 1600'FSL, 900'FWL, Section 8, T-29-N, R-7-W 30-039-25635

Gentlemen:

The above referenced well is a Fruitland Coal/Pictured Cliffs commingle. Order DHC-1629 issued for the commingling. The following allocation formula is submitted for your approval:

Fruitland Coal -	40 % gas	0 % oil
Pictured Cliffs -	60 % gas	0 % oil

These percentages are based on isolated flow tests from the Fruitland Coal and Pictured Cliffs during completion operations.

Please let me know if you have any questions.

Sincerely,

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Peggy Bradfield Regulatory/Compliance Administrator

xc: Bureau of Land Management NMOCD - Santa Fe

Downhole Commingling Allocation Worksheet

San Juan 29-7 #520 1600' FSL, 900' FWL, Section 8, T29N-R7W Rio Arriba Co., New Mexico

The percentage allocation for the Fruitland and Pictured Cliffs zones were derived as follows:

The Pictured Cliffs zone was tested during completion on 10/10/97. It flowed 281 Mcf/d, 0 bo/d and 0 bw/d against a separator pressure of 250 psig.

The Fruitland Coal zone was tested during completion on 10/15/97. It flowed 184 Mcf/d, 0 bo/d and 0 bw/d against a separator pressure of 250 psig.

Production allocation for the Pictured Cliffs =

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Pictured Cliffs production (Mcf/d) Pictured Cliffs production (Mcf/d) + Fruitland production (Mcf/d)

> 281 Mcf/d = 0.60 281 Mcf/d + 184 Mcf/d

Production allocation for the Fruitland Coal =

Fruitland Coal production (Mcf/d) Pictured Cliffs production (Mcf/d) + Fruitland production (Mcf/d)

> 184 Mcf/d = 0.40 281 Mcf/d + 184 Mcf/d