

DATE IN 1/27/98	SUSPENSE 2/16/98	ENGINEER DC	LOGGED KW	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

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 APPLICATION - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Directional Drilling
☐ NSL ☐ NSP ☐ DD ☐ SD

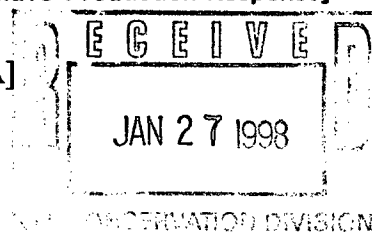
Check One Only for [B] and [C]

[B] Commingling - Storage - Measurement

☒ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR



[2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or ☐ Does Not Apply

[A] ☐ 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] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ☐ 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

Print or Type Name

Signature

Regulatory/Compliance Administrator

Title

Date

1/26/98

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 87505-8429Form C-107-A
New 3-12-96

APPROVAL PROCESS :

☒ Administrative
☐ Hearing

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE

☒ YES ☐ NO

Burlington Resources Oil & Gas Company

PO Box 4289, Farmington, NM 87499

Operator **SAN JUAN 27-5 UNIT** Address **100 M-1-27N-05W Rio Arriba**

Lease Well No. Unit Ltr. - Sec - Twp - Rge Spacing Unit Lease Types: (check 1 or more) County

OGRID NO. 14538 Property Code 7475 API NO. 30-39-0811400 Federal ☒ , State , (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)	6041-6588'		8487-8664'
3. Type of production (Oil or Gas)	gas		gas
4. Method of Production (Flowing or Artificial Lift)	flowing		flowing
5. Bottomhole Pressure	(Current) a. 639 psi	a.	a. 1032 psi
Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or	(Original) b. 1318 psi	b.	b. 3158 psi
6. Oil Gravity (^o API) or Gas BTU Content	BTU 1199		BTU 1140
7. Producing or Shut-In?	not yet producing		producing
Production Marginal? (yes or no)	yes		yes
* If Shut-In and oil/gas/water rates of last production	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data			
* If Producing, give data and oil/gas/water of recent test (within 60 days)	Date: n/a Rates:	Date: Rates:	Date: 9/97 Rates: 70 MCFD
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.

10. Are all working, overriding, and royalty interests identical in all commingled zones? ☐ Yes ☒ No
If not, have all working, overriding, and royalty interests been notified by certified mail? ☐ Yes ☒ No
Have all offset operators been given written notice of the proposed downhole commingling? ☒ Yes ☐ No11. Will cross-flow occur? ☒ 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. ☒ Yes ☐ No (If No, attach explanation)12. Are all produced fluids from all commingled zones compatible with each other? ☒ Yes ☐ No13. Will the value of production be decreased by commingling? ☐ Yes ☒ 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. ☒ Yes ☐ No15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10694

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 Jennifer L. Dobson TITLE Production Engineer DATE 01-26-98TYPE OR PRINT NAME Jennifer L. Dobson TELEPHONE NO. (505) 599-4026

**NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACERAGE DEDICATION PLAT**

All distances must be from the outer boundaries of the Section

Operator EL PASO NATURAL GAS COMPANY		Lease SAN JUAN 27-5 UNIT		Well No SF-079491	100
Unit Letter M	Section 1	Township 27-N	Range 5-W	County RIO ARriba	
Actual Footage Location of Well: 1090 feet from the SOUTH line and 825 feet from the WEST line					
Ground Level Elev. 7431	Producing Formation DAKOTA		Pool BASIN DAKOTA	Dedicated Acreage: 320.00 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?

☒ Yes ☐ No If answer is "yes," type of consolidation **Unitization**

If answer is "no," list the owners and tract descriptions which have actually 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 Commission.

CERTIFICATION

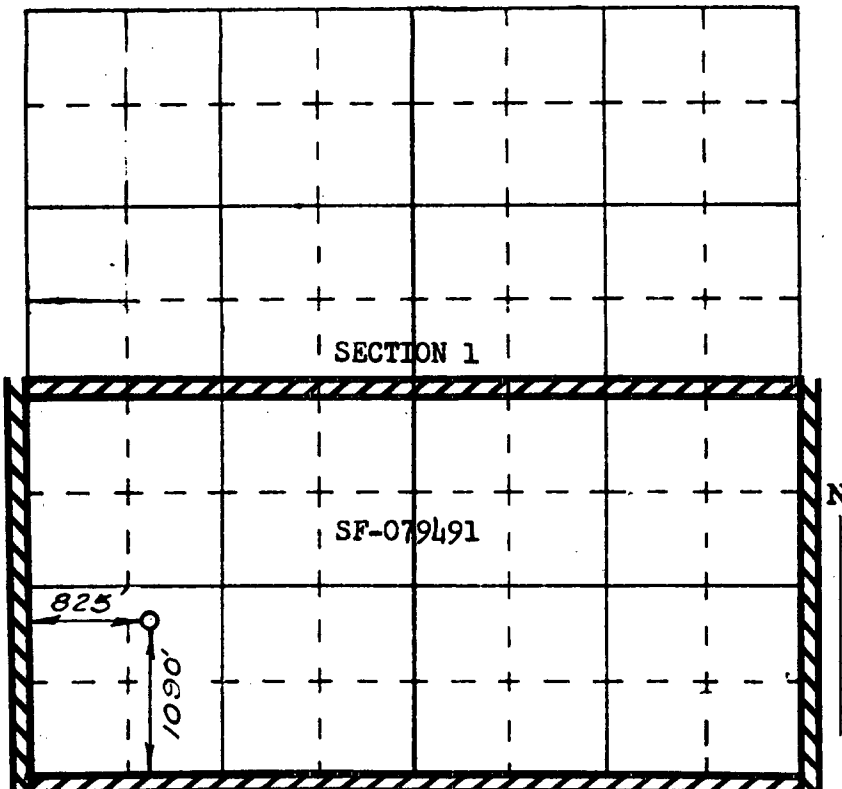
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

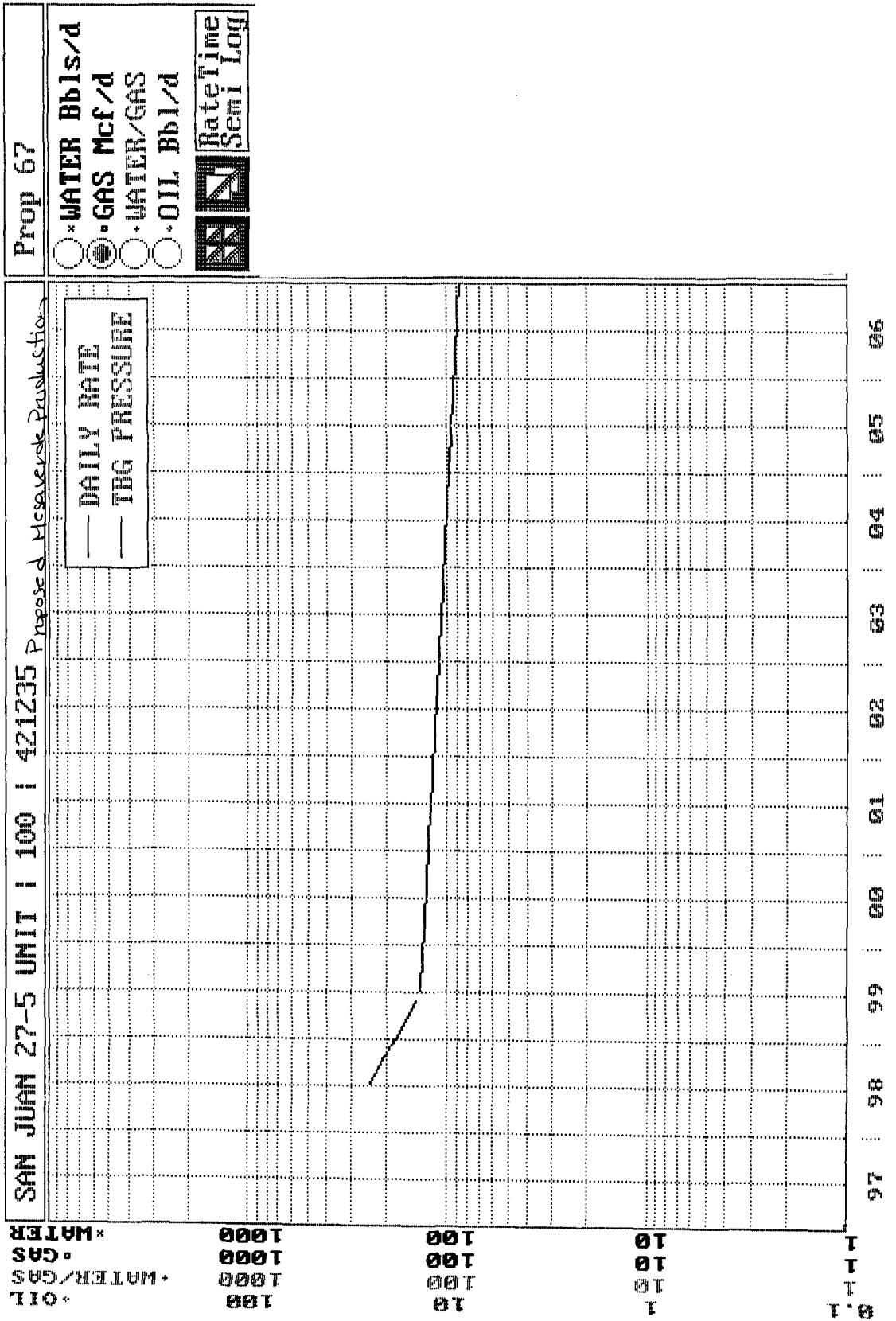
Original Signed F. H. WOOD
 Name _____
Petroleum Engineer
 Position _____
El Paso Natural Gas Company
 Company _____
September 9, 1966
 Date _____

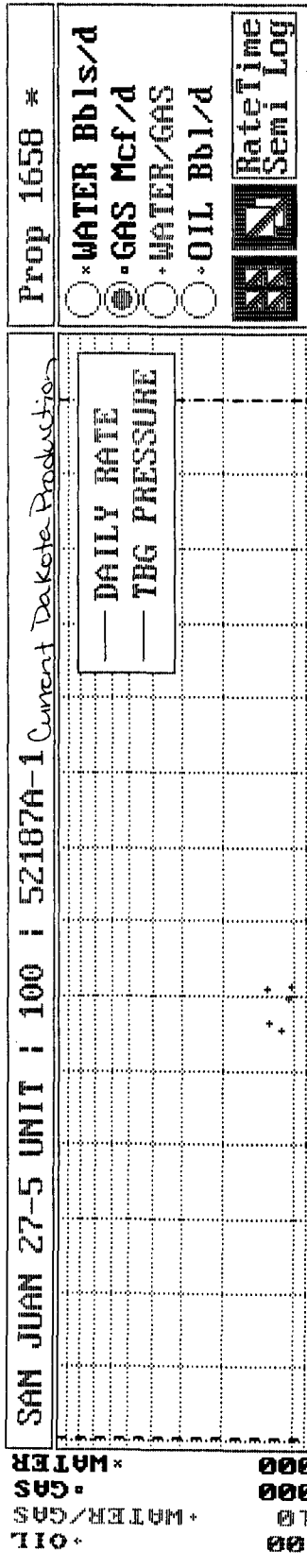
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed _____
AUGUST 3, 1966
 Registered Professional Engineer
 and/or Land Surveyor

[Signature]
 Certificate No. 1760







FARMINGTON 1997 MONTHLY PRODUCTION FOR 52187A
 SAN JUAN 27-5 UNIT 100
 BASIN DAKOTA (PRORATED GAS) FIELD DAKOTA ZONE

PHS030M1

DAYS =====				OIL =====		=====		GAS =====						
MO	T	S	ON	PC	PROD	GRV	PC	PROD	ON	BTU	PRESS	WATER	PROD	C
1	2	S		02			01				15.025			
2	2	S		02			01				15.025			
3	2	S		02			01				15.025			
4	2	S		02		60.0	01				15.025			
5	2	S		02			01				15.025			
6	2	S		02			01				15.025			
7	2	F	1	02	1		01	3	1		15.025			
8	2	F	31	02			01	92	31		15.025		1	
9	2	F	30	02			01	89	30		15.025			
10														
11														
12														

PF6 - RETURNS TO ANNUAL DISPLAY
 PF10 - HELP INFORMATION

PF3 - TRANSFER TO UPDATE
 PF9 - DISPLAY MONTHLY INJECTION
 PRS 11/05/97

00/00/00 00:00:00:0

San Juan 27-5 #100
Bottom Hole Pressures
Flowing and Static BHP
Cullender and Smith Method
Version 1.0 3/13/94

Mesa Verde		Dakota	
<u>MV - Current</u>		<u>DK-Current</u>	
GAS GRAVITY	0.69	GAS GRAVITY	0.656
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.22	%N2	0.17
%CO2	0.91	%CO2	1.23
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	6369	DEPTH (FT)	8576
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150	BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	544	SURFACE PRESSURE (PSIA)	843
BOTTOMHOLE PRESSURE (PSIA)	638.7	BOTTOMHOLE PRESSURE (PSIA)	1031.5
The Mesa Verde Pressures are from the San Juan 27-5 #14 which is an offset MV producer.			
<u>MV - Original</u>		<u>DK-Original</u>	
GAS GRAVITY	0.69	GAS GRAVITY	0.656
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.22	%N2	0.17
%CO2	0.91	%CO2	1.23
%H2S	0	%H2S	0
DIAMETER (IN)	1.995	DIAMETER (IN)	1.995
DEPTH (FT)	6369	DEPTH (FT)	8576
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150	BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1105	SURFACE PRESSURE (PSIA)	2538
BOTTOMHOLE PRESSURE (PSIA)	1317.9	BOTTOMHOLE PRESSURE (PSIA)	3157.5
The Mesa Verde Pressures are from the San Juan 27-5 #14 which is an offset MV producer.			

Page No.: 1

Print Time: Thu Nov 20 16:08:08 1997

Property ID: 3822

Property Name: SAN JUAN 27-5 UNIT | 14 | 51847A-1 Mesa Verde Pressure History

Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE-- ---CUM GAS-- M SIWHP
Mcf Psi

02/17/56	0	0.0	
03/01/56	0	1105.0	original
05/01/56	0	1117.0	
05/06/58	87000	821.0	
06/14/59	110000	892.0	
06/14/60	181000	715.0	
06/13/61	245000	666.0	
07/31/62	299000	604.0	
07/18/63	345000	639.0	
01/02/64	354000	684.0	
07/29/65	420000	633.0	
08/01/66	466000	625.0	
08/04/67	498000	609.0	
05/10/68	526000	624.0	
06/09/70	567498	546.0	
05/03/71	602183	532.0	
05/30/72	640880	518.0	
08/07/74	724632	501.0	
06/25/76	784451	524.0	
08/02/78	839073	596.0	
11/01/82	933294	599.0	
04/07/86	998146	566.0	
08/07/89	1062421	638.0	
05/20/91	1092634	612.0	
06/21/91	1092634	624.0	
05/03/93	1141866	544.0	current

Page No.: 1

Print Time: Thu Nov 20 16:08:22 1997

Property ID: 1658

Property Name: SAN JUAN 27-5 UNIT | 100 | 52187A-1 Dakota Pressure History

Table Name: K:\ARIES\RR98PDP\TEST.DBF

--DATE-- ---CUM GAS-- M SIWHP
■■■■■■■■■■ ■■■■■■Mcf■■■■■■ ■■■■Psi■■■■

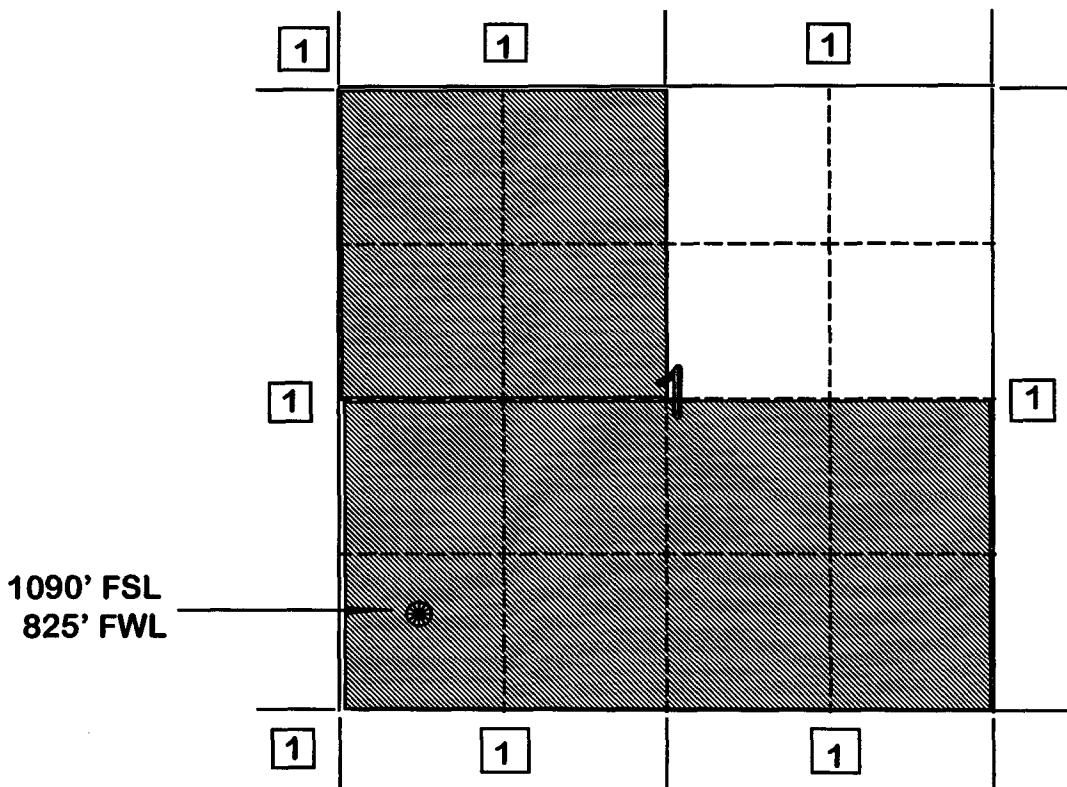
12/08/66	0	2538.0	original
10/31/67	80000	1376.0	
05/10/68	126000	1207.0	
05/29/69	196077	1196.0	
06/23/69	203000	1196.0	
06/09/70	264396	1054.0	
05/03/71	311831	1229.0	
05/30/72	363372	1119.0	
06/23/75	500828	1157.0	
07/06/77	579920	1185.0	
10/15/79	649573	1117.0	
05/21/81	700153	1081.0	
09/22/83	766219	1098.0	
06/06/85	818852	935.0	
05/20/88	888760	1157.0	
05/29/90	955934	843.0	current.

BURLINGTON RESOURCES OIL AND GAS COMPANY

**San Juan 27-5 Unit #100
Offset Operator/Owner Plat**

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

Township 27 North, Range 5 West



1) Burlington Resources

DATE: November 03, 1997

NAME: SAN JUAN 27-5 UNIT 100

FORM: MESAVERDE

LOCATION
UNIT: M
SEC: 1
TWN: 27N
RNG: 5W

<p>7/67 San Juan 28-5 Unit 53 244/966 (97) 1/0 [35]</p> <p>6/60 San Juan 28-5 Unit 21 51/1211 (97) 0/0</p> <p>7/97 San Juan 28-5 Unit 73M 783/24 (97) 3/0</p>	<p>11/60 San Juan 28-5 Unit 47 320/1413 (97) 2/5</p> <p>7/97 San Juan 28-5 Unit 45M 348/21 (97) 2/0</p> <p>9/58 San Juan 28-4 Unit 18 288/1536 (97) 0/5</p>	<p>4/57 San Juan 28-4 Unit 11 100/1547 (97) [31] 0/0</p>
<p>5/90 San Juan 27-5 Unit 23A 225/413 (97) 0/1</p> <p>1/55 San Juan 27-5 Unit 7 218/934 (97) 1/0</p> <p>4/97 San Juan 27-5 Unit 111M 343/31 (97) 0/0</p> <p>12/69 San Juan 27-5 Unit 23 52/1722 (97) 0/6</p> <p>[2]</p> <p>5/57 San Juan 27-5 Unit 22 25/1146 (91) 0/0</p> <p>6/60 San Juan 27-5 Unit 55 213/447 (97) 0/0</p> <p>12/96 San Juan 27-5 Unit 100M 189/86 (97) 1/0</p> <p>10/60 San Juan 27-4 Unit 24 180/990 (97) 0/0</p> <p>7/58 San Juan 27-4 Unit 15 108/1244 (97) 0/0</p> <p>[6]</p> <p>3/81 San Juan 27-4 Unit 15A 193/647 (97) 1/3</p> <p>San Juan 27-5 Unit 100 DK</p>	<p>[1]</p> <p>2/87 San Juan 27-5 Unit 102M 135/376 (97) 0/1</p> <p>7/61 San Juan 27-4 Unit 31 105/1253 (97) 0/4</p>	<p>11/77 San Juan 27-4 Unit 123 168/828 (97) 1/3</p> <p>[7]</p>
<p>10/84 San Juan 27-5 Unit 99E 92/709 (97) 0/3</p> <p>2/56 San Juan 27-5 Unit 14 49/1225 (97) 0/0</p> <p>5/97 San Juan 27-5 Unit 105M 350/42 (97) 1/0</p> <p>[11]</p>	<p>[12]</p> <p>INA 3/63 San Juan 27-5 Unit 39 37/829 (95) 0/0</p>	<p>11/77 San Juan 27-4 Unit 123 168/828 (97) 1/3</p>

R-4-W

R-5-W

LEGEND

COMPLETION DATE

WELL NAME

MCF/D-CUM(MMF)

BOP/D-CUM(MBO)

DATE: November 03, 1997
 NAME: SAN JUAN 27-5 UNIT 100
 FORM: DAKOTA

LOCATION
 UNIT: M
 SEC: 1
 TWN: 27N
 RNG: 5W

T
28
N

T
27
N

<p>4/69 * San Juan 28-5 Unit 73 149/1363 (97) [35] 0/5</p> <p>7/97 * San Juan 28-5 Unit 45 48/725 (97) [36] 0/0</p> <p>7/97 * San Juan 28-5 Unit 45M 227/17 (97) 2/0</p> <p>10/67 * San Juan 28-4 Unit 30 60/2833 (96) [31] 0/3</p>	<p>9/67 * San Juan 28-5 Unit 45 48/725 (97) [36] 0/0</p> <p>8/67 * San Juan 28-5 Unit 74 181/2096 (97) 1/7</p> <p>7/97 * San Juan 28-5 Unit 45M 227/17 (97) 2/0</p> <p>10/67 * San Juan 28-4 Unit 29 31/704 (97) 0/0</p>	<p>9/67 * San Juan 28-5 Unit 45 48/725 (97) [36] 0/0</p> <p>8/67 * San Juan 28-5 Unit 74 181/2096 (97) 1/7</p> <p>7/97 * San Juan 28-5 Unit 45M 227/17 (97) 2/0</p> <p>10/67 * San Juan 28-4 Unit 29 31/704 (97) 0/0</p>
<p>6/67 * San Juan 28-5 Unit 72 191/2731 (97) 1/11</p> <p>7/97 * San Juan 28-5 Unit 73M 320/9 (97) 3/0</p> <p>4/90 * San Juan 27-5 Unit 110E 180/448 (97) 0/1</p> <p>8/68 * San Juan 27-5 Unit 110 138/1410 (97) 1/5</p> <p>7/69 * San Juan 27-5 Unit 111 95/891 (97) 1/6</p> <p>[2] 4/97 * San Juan 27-5 Unit 111M 220/13 (97) 0/0</p>	<p>6/67 * San Juan 28-5 Unit 74 181/2096 (97) 1/7</p> <p>8/67 * San Juan 27-5 Unit 102 375/3363 (97) 0/6</p> <p>5/86 * San Juan 27-5 Unit 102M 133/519 (97) 0/2</p> <p>8/67 * San Juan 27-5 Unit 104 187/2325 (97) 0/4</p> <p>12/96 * San Juan 27-5 Unit 100M 207/76 (97) 0/0</p> <p>6/67 * San Juan 27-5 Unit 106 157/1423 (97) [1] 0/4</p> <p>9/68 * San Juan 27-4 Unit 38 55/832 (97) 0/5</p> <p>9/68 * San Juan 27-4 Unit 40 17/713 (97) [6] 0/0</p>	<p>9/67 * San Juan 28-5 Unit 45 48/725 (97) [36] 0/0</p> <p>8/67 * San Juan 28-5 Unit 74 181/2096 (97) 1/7</p> <p>7/97 * San Juan 28-5 Unit 45M 227/17 (97) 2/0</p> <p>10/67 * San Juan 28-4 Unit 29 31/704 (97) 0/0</p>
<p>7/83 * San Juan 27-5 Unit 99E 170/641 (97) 1/5</p> <p>11/65 * San Juan 27-5 Unit 99 192/2745 (97) 0/9</p> <p>6/67 * San Juan 27-5 Unit 105 146/1875 (97) 1/11</p> <p>10/81 * San Juan 27-5 Unit 105M 302/954 (97) 2/6</p> <p>[11]</p>	<p>8/67 * San Juan 27-5 Unit 102 375/3363 (97) 0/6</p> <p>5/86 * San Juan 27-5 Unit 102M 133/519 (97) 0/2</p> <p>8/67 * San Juan 27-5 Unit 104 187/2325 (97) 0/4</p> <p>12/96 * San Juan 27-5 Unit 100M 207/76 (97) 0/0</p> <p>6/67 * San Juan 27-5 Unit 106 157/1423 (97) [1] 0/4</p> <p>9/68 * San Juan 27-4 Unit 38 55/832 (97) 0/5</p> <p>9/68 * San Juan 27-4 Unit 40 17/713 (97) [6] 0/0</p>	<p>9/55 * San Juan 27-4 Unit 5 6/1733 (97) 0/1</p> <p>9/68 * San Juan 27-4 Unit 41 268/3487 (97) 1/7</p> <p>[7]</p>

R-4-W

R-5-W

LEGEND
 COMPLETION DATE *
 WELL NAME
 MCF/D-CUM(MMF)
 BOP/D-CUM(MBO)

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:

"If sufficient data exists on a lease, pool, formation, geographic area, etc., so as to render it unnecessary to repeatedly provide such data on Form C-107-A, an operator may except any of the various criteria required under Paragraph 303.D. of this rule by establishing a "reference case". The Division, upon its own motion, or by application from an operator, may establish "reference cases" either administratively or by hearing. Upon Division approval of such "reference cases" for specific criteria, subsequent applications to downhole commingle (Form C-107-A) will be required only to cite the Division order number which established such exceptions and shall not be required to submit data for those criteria."

(4) The applicant is the current operator of the San Juan 27-5 Unit which encompasses some 23,043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 27-5 Unit, the applicant currently operates one hundred and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and four (4) Basin-Fruitland Coal Gas Pool wells.

(6) According to its evidence and testimony, Burlington seeks to:

- a) establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations whereby these formations and/or pools may be identified as "marginal" on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit. The applicant further proposes that the data provided in the immediate case serve as supplemental data or confirmation that these formations and/or pools should be classified as "marginal";
- b) establish a "reference case" for pressure criteria in the Dakota and Pictured Cliffs formations whereby the Division may utilize data provided in the immediate case to verify the pressure data provided on Form C-107-A's subsequently filed for wells within the San Juan 27-5 Unit;

- 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:

- a) the average shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations at the time of initial development were approximately 3.141 psi and 1.118 psi, respectively; and.
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1.032 psi and 441 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 27-5 Unit so as to except pressure criteria as proposed by the applicant.

(11) The applicant testified that various allocation methods will be utilized for downhole commingled wells within the San Juan 27-5 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:

- a) the subtraction method will likely be utilized in those instances involving the Basin-Fruitland Coal Gas Pool and in those instances where a zone with a well established decline rate is commingled with a newly completed zone;
- b) a fixed allocation formula will be utilized in those instances where production history for both zones is available, or in those instances where newly completed zones are tested and stabilized flow rates obtained.

(12) The allocation methods proposed by the applicant are routinely utilized in the industry and approved by the Division and therefore the proposal to except allocation formulas should be approved.

(13) In support of its request to establish a "reference case" or administrative procedure for providing notice within the San Juan 27-5 Unit the applicant presents evidence and testimony which indicates that:

- a) the interest ownership between two zones within a given wellbore in the San Juan 27-5 Unit is generally not common;
- b) pursuant to Division Rule No. 303.D., applicant is currently required to notify all interest owners within the San Juan 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit;

- 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 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.

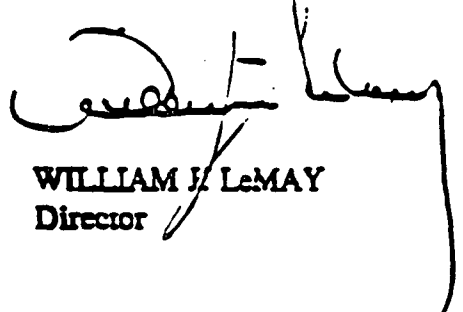
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify the Pictured Cliffs and Dakota pressure information provided, and support or justification for utilizing a given method or formula for allocation of production, provided however, in the event any of the data described above appearing on Form C-107-A appears to be beyond the data range provided in this case, the Division may require the submittal of additional supporting data.

(3) In order to obtain Division authorization to downhole commingle wells within the San Juan 27-5 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Aztec Offices of the Division. Such application shall contain all the information required under Rule No. 303.C. of the Division Rules and Regulations, provided however that the applicant shall not be required to provide notice to all interest owners within the San Juan 27-5 Unit of such proposed commingling.

(4) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM H. LEMAY
Director

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