

DATE-IN 6/22/98	SUSPENSE 7/13/98	ENGINEER DC	LOGGED BY MW	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Engineering Bureau -  
 2040 South Pacheco, Santa Fe, NM 87505



1998

**ADMINISTRATIVE APPLICATION COVERSHEET**

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**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

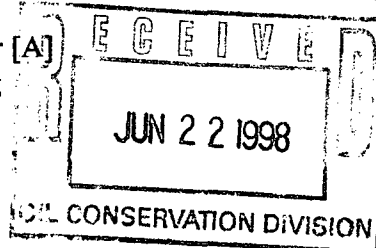
Check One Only for [B] or [C]

[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** - Certification

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 (including API numbers, pool codes, etc.), pertinent information and any required notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name

Signature

Title

Date

*[Handwritten Signature]*

6-18-98

## 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 87505-6429Form C-107-A  
New 3-12-96

## APPROVAL PROCESS :

☒ Administrative  
☐ Hearing

## APPLICATION FOR DOWNHOLE COMMINGLING

## EXISTING WELLBORE

☒ YES ☐ NO

Burlington Resources Oil and Gas

PO Box 4289, Farmington, NM 87499

Operator

San Juan 28-5 Unit #29-A

Address

D-18-28N-05W

Rio Arriba

Lease

Well No.

Unit Ltr. - Sec - Twp - Rge

County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO. 14538 Property Code 7460

API NO. 30-039- 22229

Federal ☒ , State ☐ , Fee ☐

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Wildcat Pictured Cliffs		Blanco Mesaverde - 72319
2. Top and Bottom of Pay Section (Perforations)	3639'-3722'		5332'-6188'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure	(Current) a. 514 psi (see attachment)		a. 451 psi (see attachment)
Oil Zones - Artificial Lift: Estimated Current	(Original) b. 1192 psi (see attachment)		b. 865 psi (see attachment)
Gas & Oil - Flowing: Measured Current			
All Gas Zones: Estimated or Measured Original			
6. Oil Gravity (°API) or Gas BTU Content	BTU 1126		BTU 1174
7. Producing or Shut-In?	Producing		Producing
Production Marginal? (yes or no)	Yes		No
* If Shut-In and oil/gas/water rates of last production	Date: N/A 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 water of recent test (within 60 days)	Date: 6/4/98 Rates: 15 mcf/d 0.6 bopd		Date: 6/4/98 Rates: 151 mcf/d 0.6 bopd
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	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.

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 ☐ No

15. NMOC Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-10695

## 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 Y. Tom Loveland TITLE Production Engineer DATE 6/18/98TYPE OR PRINT NAME L. Tom Loveland TELEPHONE NO. ( 505 ) 326-9700

All distances must be from the outer boundaries of the Section.

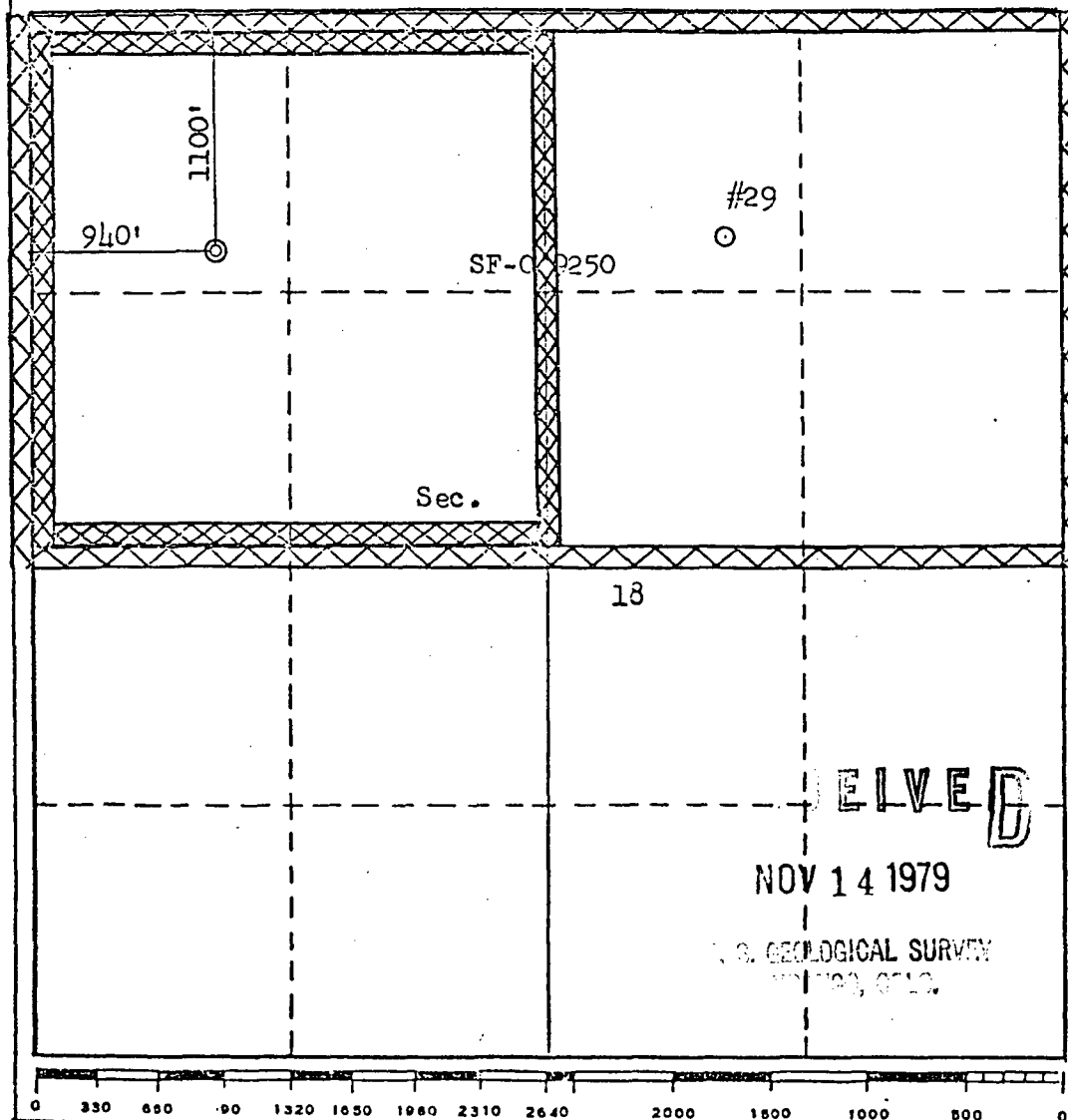
Operator <b>EL PASO NATURAL GAS COMPANY</b>			Lease <b>SAN JUAN 28-5 UNIT (SF-079250)</b>		Well No. <b>29A</b>
Unit Letter <b>D</b>	Section <b>18</b>	Township <b>28N</b>	Range <b>5W</b>	County <b>Rio Arriba</b>	
Actual Footage Location of Well: <b>1100</b> feet from the <b>North</b> line and <b>940</b> feet from the <b>West</b> line					
Ground Level Elev. <b>6634</b>	Producing Formation <b>Mesa Verde -</b>	Pictured <b>Cliffs</b>	Pool Undesignated Pictured Cliffs <b>Blanco Mesa Verde</b>		Dedicated Acreage: <b>160.00 &amp; 320.00</b> 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 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 Commission. NOTE: THIS PLAT IS REISSUED TO SHOW DUAL COMPLETION. 11-2-79



CERTIFICATION

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

*D. G. Davis*

Name

Drilling Clerk

Position

El Paso Natural Gas Co.

Company

November 9, 1979

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.

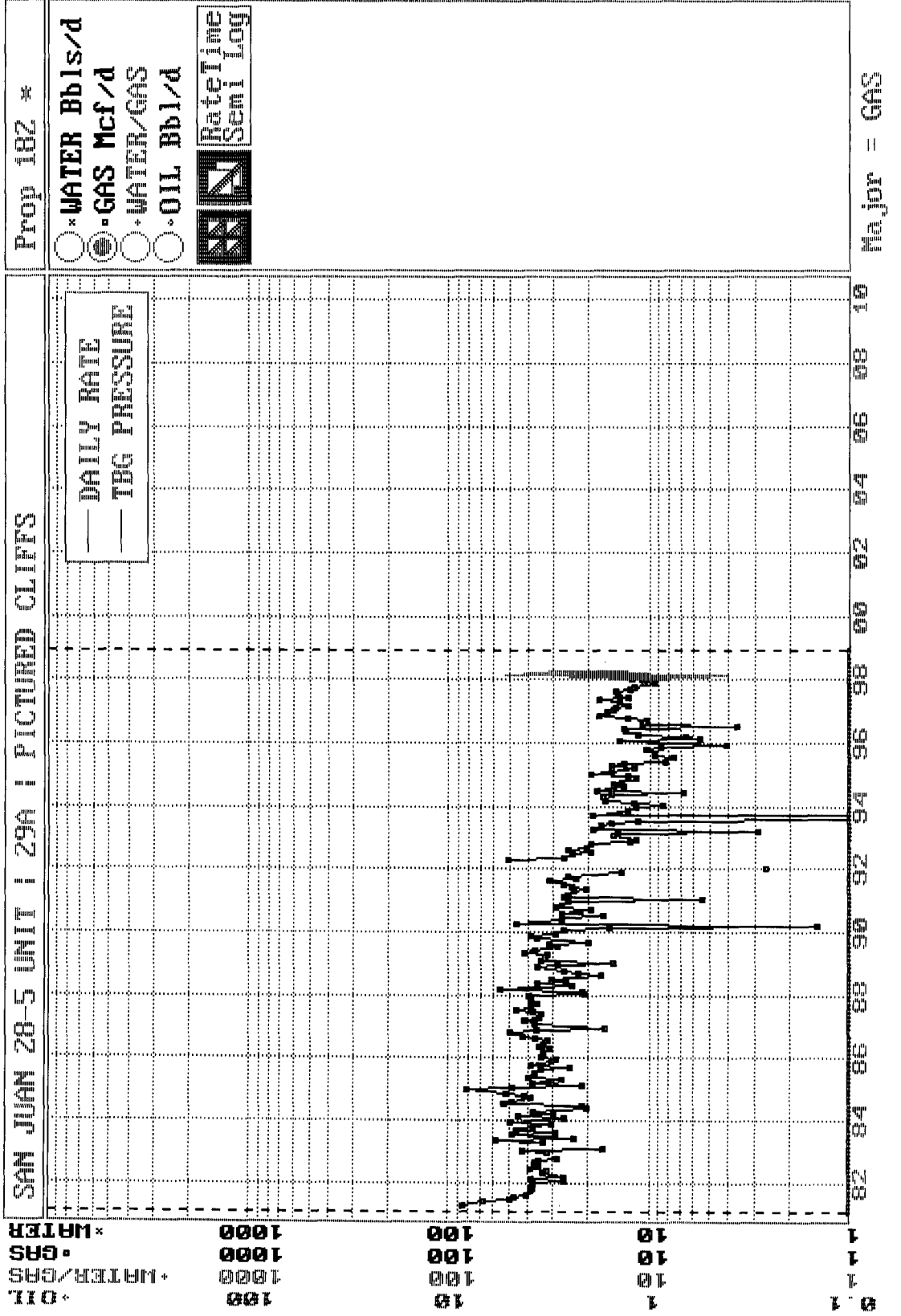
Date Surveyed

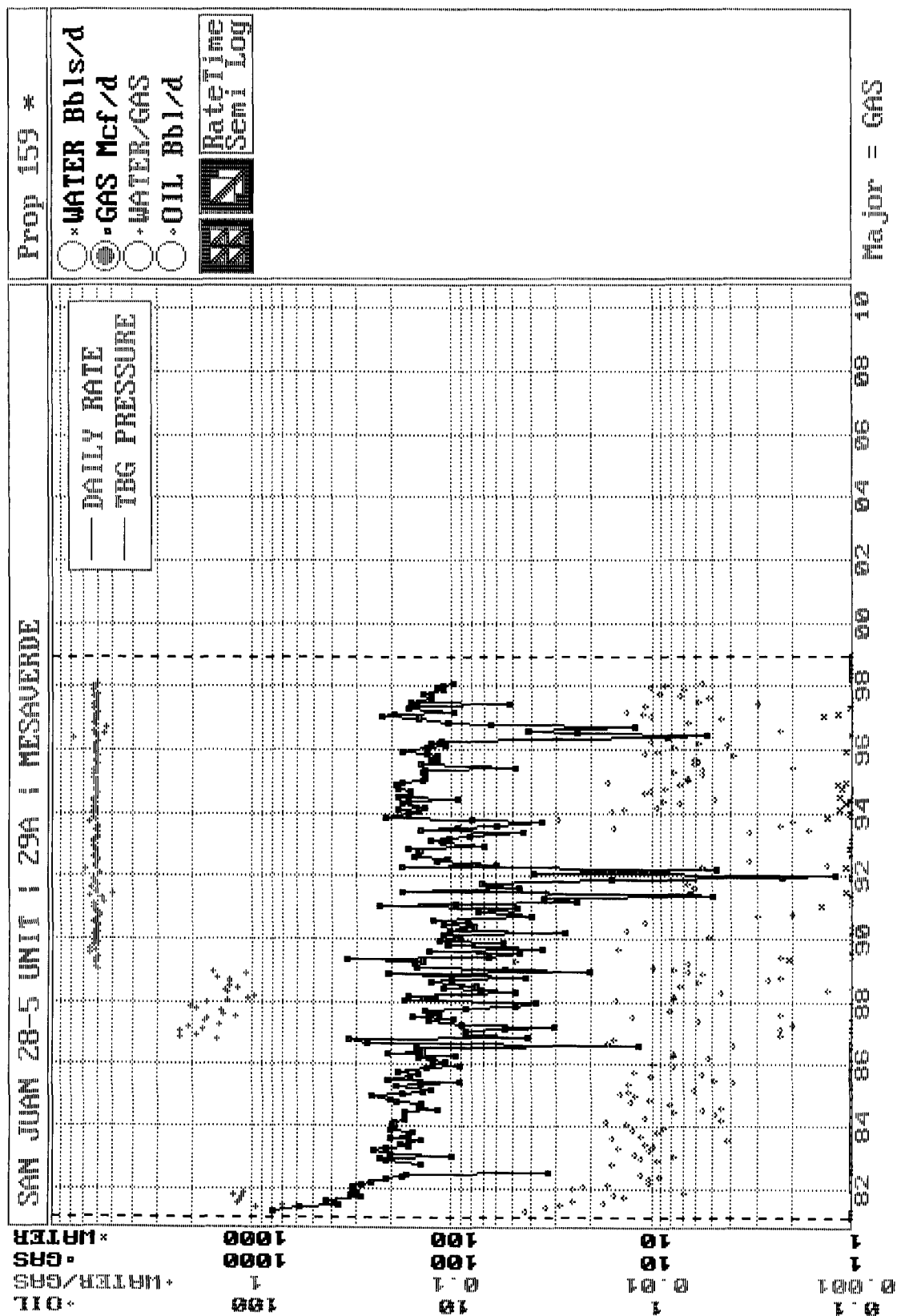
August 26, 1979

Registered Professional Engineer and/or Land Surveyor

*Fred B. Kern Jr.*

Certificate No. 3950





**San Juan 28-5 Unit #29A**  
**Bottom Hole Pressures**  
**Flowing and Static BHP**  
**Cullender and Smith Method**  
Version 1.0 1/14/98

<b>Pictured Cliffs</b>		<b>Mesa Verde</b>	
<b><u>PC-Current</u></b>		<b><u>MV-Current</u></b>	
GAS GRAVITY	<u>0.665</u>	GAS GRAVITY	<u>0.729</u>
COND. OR MISC. (C/M)	<u>C</u>	COND. OR MISC. (C/M)	<u>C</u>
%N2	<u>0.32</u>	%N2	<u>0.35</u>
%CO2	<u>1.09</u>	%CO2	<u>0.75</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>7</u>	DIAMETER (IN)	<u>2.375</u>
DEPTH (FT)	<u>3681</u>	DEPTH (FT)	<u>5760</u>
SURFACE TEMPERATURE (DEG F)	<u>60</u>	SURFACE TEMPERATURE (DEG F)	<u>60</u>
BOTTOMHOLE TEMPERATURE (DEG F)	<u>115</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>146</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>469</u>	SURFACE PRESSURE (PSIA)	<u>388</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>513.7</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>451.1</u>
<b><u>PC-Original</u></b>		<b><u>MV-Original</u></b>	
GAS GRAVITY	<u>0.665</u>	GAS GRAVITY	<u>0.729</u>
COND. OR MISC. (C/M)	<u>C</u>	COND. OR MISC. (C/M)	<u>C</u>
%N2	<u>0.32</u>	%N2	<u>0.35</u>
%CO2	<u>1.09</u>	%CO2	<u>0.75</u>
%H2S	<u>0</u>	%H2S	<u>0</u>
DIAMETER (IN)	<u>7</u>	DIAMETER (IN)	<u>2.375</u>
DEPTH (FT)	<u>3681</u>	DEPTH (FT)	<u>5760</u>
SURFACE TEMPERATURE (DEG F)	<u>60</u>	SURFACE TEMPERATURE (DEG F)	<u>60</u>
BOTTOMHOLE TEMPERATURE (DEG F)	<u>115</u>	BOTTOMHOLE TEMPERATURE (DEG F)	<u>146</u>
FLOWRATE (MCFPD)	<u>0</u>	FLOWRATE (MCFPD)	<u>0</u>
SURFACE PRESSURE (PSIA)	<u>1078</u>	SURFACE PRESSURE (PSIA)	<u>736</u>
BOTTOMHOLE PRESSURE (PSIA)	<u>1192.4</u>	BOTTOMHOLE PRESSURE (PSIA)	<u>864.8</u>

Page No.: 22  
 Print Time: Fri May 08 08:28:41 1998  
 Property ID: 182  
 Property Name: SAN JUAN 28-5 UNIT | 29A | PICTURED CLIFFS  
 Table Name: S:\ARIES\78LTL\TEST.DBF

<u>--DATE--</u>	<u>--CUM_OIL--</u> Bbl	<u>---CUM_GAS---</u> Mcf	<u>M SIWHP</u> Psi	
02/03/81		0	1077.0	
02/18/81		0	1078.0	Original
06/04/81		6182	668.0	
05/20/82		18479	561.0	
09/28/83		34003	533.0	
09/20/85		62287	590.0	
05/26/93		140478	547.0	
04/01/98		161618	469.0	Current estimated from P/z data

MV

Page No.: 1  
 Print Time: Fri May 08 08:28:37 1998  
 Property ID: 159  
 Property Name: SAN JUAN 28-5 UNIT | 29A | MESAVERDE  
 Table Name: S:\ARIES\78LTL\TEST.DBF

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

01/24/81		0	725.0
02/18/81		0	736.0
06/04/81		41554	539.0
05/20/82		153072	397.0
09/28/83		226986	486.0
07/20/84		281035	424.0
09/19/86		403318	351.0
09/18/89		522806	432.0
02/18/91		569968	600.0
06/07/91		572107	612.0
05/03/93		633606	473.0
04/01/98		854929	388.0

Original

Current estimated from P/z data



## Package Preparation Volume Data

DPNo: 63413A

SAN JUAN 28-5 UNIT

29A

Form: PC

Supt: 60 KEN RAYBON

FF: 335 LARY BYARS

MS: 319 STEVE BAIRD

Pipeline: EPNG

Plunger: No

Dual: Yes

Compressor: No

<u>Ownership (No Trust)</u>			<u>Prior Year</u>			<u>Current Year</u>			
	<u>Gas</u>	<u>Oil</u>			<u>Days</u>			<u>Days</u>	
				<u>MCF/M</u>	<u>BOPM</u>	<u>On</u>	<u>MCF/M</u>	<u>BOPM</u>	<u>On</u>
GWl:	100.0000%	100.0000%	Jan	467	0.0	31	379	0.0	31
GNI:	82.5000%	82.5000%	Feb	463	0.0	28	311	0.0	28
			Mar	396	0.0	31	493	0.0	31
			Apr	442	0.0	30	0	0.0	30
			May	557	0.0	31	0	0.0	0
			Jun	394	0.0	23.9	0	0.0	0
			Jul	452	0.0	31	0	0.0	0
			Aug	455	0.0	31	0	0.0	0
			Sept	387	0.0	30	0	0.0	0
			Oct	372	0.0	31	0	0.0	0
			Nov	289	0.0	30	0	0.0	0
			Dec	328	0.0	31	0	0.0	0
			Total	5,002	0.0		1,183	0.0	
<u>Volumes</u>									
<u>(Days On)</u>	<u>MCFD</u>	<u>BOPD</u>							
7 Day Avg	11	0.0							
30 Day Avg	15	0.0							
60 Day Avg	16	0.0							
3 Mo Avg	13	0.0							
6 Mo Avg	12	0.0							
12 MoAvg	14	0.0							
<u>Volumes</u>									
<u>(Days in Month)</u>	<u>MCFD</u>	<u>BOPD</u>							
30 Day Avg	15	0.0							
60 Day Avg	16	0.0							
3 Mo Avg	13	0.0							
6 Mo Avg	12	0.0							
12 Mo Avg	13	0.0							

Print Form

Exit Volumes Data

Print Form

Exit Volumes Data

6/4/98

## Package Preparation Volume Data

DPNo: 53413B

SAN JUAN 28-5 UNIT

29A

Form: MV

Supt: 60 KEN RAYBON

FF: 335 LARY BYARS

MS: 319 STEVE BAIRD

Pipeline: EPNG

Plunger: No

Dual: Yes

Compressor: No

Ownership (No Trust)			Prior Year			Current Year		
	Gas	Oil			Days			Days
	GWI:			MCF/M	BOPM	On	MCF/M	BOPM
	GNI:							On
	73.1659%	73.1659%	Jan	6,930	31.0	31	3,325	26.0
	62.3562%	62.3562%	Feb	5,969	34.0	28	2,963	17.0
			Mar	2,938	41.0	31	3,601	28.0
			Apr	4,992	0.0	30	0	0.0
			May	4,542	33.0	31	0	0.0
			Jun	1,534	9.0	23.9	0	0.0
			Jul	4,942	18.0	31	0	0.0
			Aug	3,896	16.0	31	0	0.0
			Sept	3,850	22.0	30	0	0.0
			Oct	4,284	28.0	31	0	0.0
			Nov	3,334	21.0	30	0	0.0
			Dec	3,578	31.0	31	0	0.0
			Total	50,789	284.0		9,889	71.0
<b>Volumes</b>								
<b>(Days On)</b>	<b>MCFD</b>	<b>BOPD</b>						
7 Day Avg	6	4.3						
30 Day Avg	151	0.6						
60 Day Avg	133	0.8						
3 Mo Avg	110	0.8						
6 Mo Avg	116	0.8						
12 MoAvg	125	0.7						
<b>Volumes</b>								
<b>(Days in Month)</b>	<b>MCFD</b>	<b>BOPD</b>						
30 Day Avg	151	0.6						
60 Day Avg	133	0.8						
3 Mo Avg	110	0.8						
6 Mo Avg	116	0.8						
12 Mo Avg	123	0.7						

Print Form

Exit Volumes Data

6/4/98

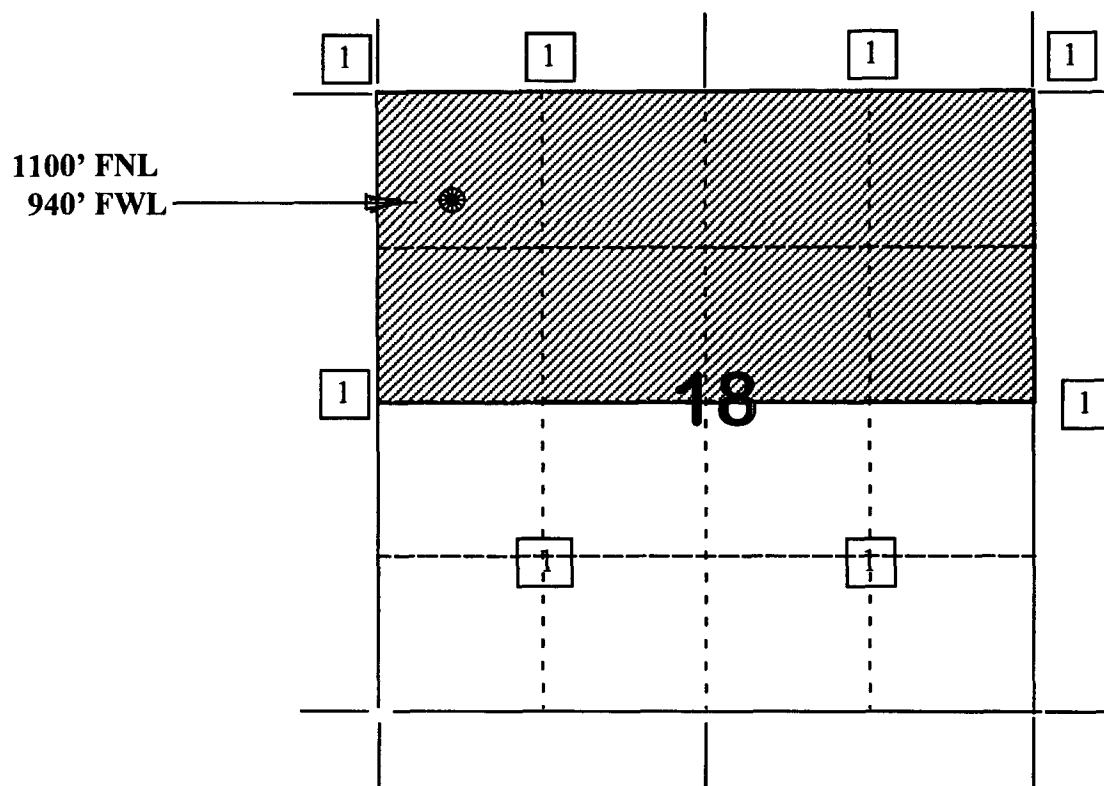
***BURLINGTON RESOURCES OIL AND GAS COMPANY***

**San Juan 28-5 Unit #29A**

**OFFSET OPERATOR/OWNER PLAT**

**Pictured Cliffs (NW/4) / Mesaverde (N/2) Formations Commingle Well**

**Township 28 North, Range 5 West**



48 ●  48A ●	9A ●  36 9 ●  50 ● 50A ●	37A ●  37 ●  31  41A ●	   32  38 ●
20R ●	20 ● 12 ● 20A ●	12 ● 7  12A ●	7 ● 8  7A ●
5 ●	57A ●  13 57 ● 71A ●	29 ● ● 18 34 ● 34A ●	28A ●  28 ● 33 ● 17 33A ●
	99M ●  24 18 65A ●	57M ●  19 35 4R ●	14A ●  14 ● 17 20 ●

PLH 5/7/98

*SJ 28-5 Unit 29A*  
*Sec. 18, T28N, R5W*  
*Mesaverde/Pictured Cliffs*

**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. 11627  
ORDER NO. R-10695**

**APPLICATION OF BURLINGTON RESOURCES  
OIL & GAS COMPANY FOR THE ESTABLISHMENT  
OF A DOWNHOLE COMMINGLING "REFERENCE  
CASE" FOR ITS SAN JUAN 28-5 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 28-5 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 28-5 Unit which encompasses some 17,399 acres in Township 28 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 28-5 Unit, the applicant currently operates sixty-seven (67) Basin-Dakota Gas Pool wells, seventy-one (71) Blanco-Mesaverde Gas Pool wells, sixteen (16) Gobernador-Pictured Cliffs, Oso-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and nineteen (19) 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 28-5 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 28-5 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 28-5 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 28-5 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 28-5 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 1,258 MMCFG and 77 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 276 MCFGD and 136 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 28-5 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 28-5 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 3,149 psi and 1,143 psi, respectively; and,
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1,059 psi and 714 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 28-5 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 28-5 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 by 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 28-5 Unit the applicant presented evidence and testimony which indicates that:

- a) the interest ownership between two zones within a given wellbore in the San Juan 28-5 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 28-5 Unit every time a Form C-107-A is submitted to the Division. There are a considerable number of such interest owners within the unit;



- c) providing notice to each interest owner within the San Juan 28-5 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 28-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-5 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 28-5 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 28-5 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 28-5 Unit, San Juan County, New Mexico, is hereby approved.

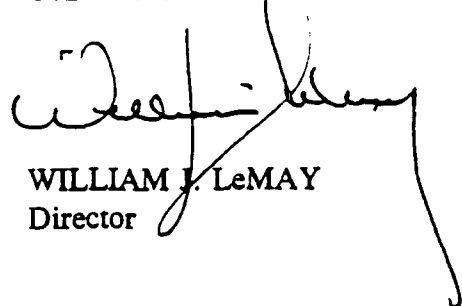
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 28-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify 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 28-5 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 28-5 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 J. LeMAY  
Director

S E A L