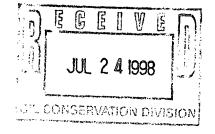
MERRION

OIL & GAS

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July 20, 1998



Mr. David Catanach New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Re: Application for Administrative Approval
Downhole Commingling
Basin Dakota Pool and Crouch Mesa Mesaverde Pool
Fifield Com 1E
Section 5, T29N, R11W
San Juan County, New Mexico

Dear Mr. Catanach:

Merrion Oil & Gas requests administrative approval for downhole commingling of the Basin Dakota and the Crouch Mesa Mesaverde Pools in the subject wellbore. The following information is provided in support of this application:

I. <u>Proposed Spacing Units</u>

Exhibit 1 is the ownership plat showing the leases involved and showing the offset operators. Exhibit 2 shows the C-102 plat for the Basin Dakota with a 294 acre spacing unit in the N/2 of Section 5. Exhibit 3 is the C-102 plat for the Crouch Mesa Mesaverde Pool with a \pm 148 acre spacing unit in the NW/4 of Section 5.

II. Justification

Both the Mesaverde zone and the Dakota zone are depleted to between 660 and 800 psi in the offset wells (see Exhibits 4 and 5). Because the remaining recoverable reserves from each zone is expected to be marginal, the only way a well can be economically justified is to commingle the two zones.

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III. Allocation Methodology

Because both zones exhibit similar exponential decline characteristics (see Exhibit 4), initial flow tests will be used to proportionally split flow between the two zones. If future changes in the condensate API gravity or gas BTU content indicate a substantive change in the mix of production from the two zones, the allocation formula will be adjusted based on additional testing.

IV. Reservoir Fluid Compatibility

Water analyses are not available for wells in the immediate area. However, the waters of the Mesaverde and Dakota have been generally determined to be compatible across the basin based on other similar applications to the OCD.

V. Cross Flow Between Zones

The current reservoir pressure of the Dakota is at \pm 820 psi while the Mesaverde is at \pm 660 psi. With a flowing line pressure at around 250 psi, crossflow is not anticipated to be a problem.

VI. Well Ownership Notification

The spacing unit and ownership of the two zones is not the same (see Exhibit 1). Exhibit 6 is a list of all working interest, override, and royalty interest owners in the well who received certified copies of this application.

VII. Offset Operator Notification

Exhibit 1 is a plat showing all offset operators. Exhibit 7 is a list of all the offset operators who received a certified copy of this application.

VIII. Summary

Neither zone has the reserves to economically justify a well. Commingling the zones will maximize reserves and protect correlative rights. Therefore, we request your approval of this application.

Please call me with questions or if additional information is required.

Sincerely,

George F. Sharpe

Manager - Oil & Gas Investments

xc: Offset Operators and Well Owners

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Objections to this application must be sent to the NMOCD within 20 days of receipt of this application. If you do not object, please sign and return this waiver sheet to George Sharpe.

WAIVER			
	hereby waives objection to this application.		
Company or Individual Name			
Signature	Date		

DISTRICT II

P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico Energy, Minerals and Natural Resources Department

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

OIL CONSERVATION DIVISION

TELEPHONE NO. (505) 327-9801

APPROVAL PROCESS: X Administrative __Hearing

811 South First St., Artesia, NM 88210-2835 DISTRICT III

2040 S. Pacheco Santa Fe, New Mexico 87505-6429

EXISTING WELLBORE

1000 Rio Brezos Rd, Aztec. NM 87410-1693	APPLICATION FOR DOV	MNHOLE COMMINGLING	YES NO	
MERRION OIL & GAS CORPOR	RATION 610 Reil	ly Averue, Farmington,	NM 87401-2634	
FiField Com	1E E-05-29		San Juan	
Lease	Well No. Unit t	l.tr Sec - Twp - Rge Spacing	County 3 Unit Lease Types: (check 1 or more)	
OGRID NO. 014634 Property Cod	e 22343 API NO. 30)-045-29517 Federal	X , State, (and/or) Fee	
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone	
Pool Name and Pool Code	Crouch Mesa Mesaverde		Basin Dakota	
Top and Bottom of Pay Section (Perforations)	** Will be provided	after well is drilled	***	
3. Type of production (Oil or Gas)	Gas	·	Gas	
4. Method of Production (i adving or Artificial Lift) (i adving or Artificial Lift)	Flow		Ficw	
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	a. (Current) 730 psi	a.	ø. 820 psi	
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	b. ^(Original) 990 psi	b.	^b 2525 psi	
6. Oil Gravity ([°] API) or Gas BTU Content	BTU 1300		BTU 1188	
7. Producing or Shut-In?	SI - not drilled yet	t	SI - not drilled yet	
Production Marginal? (yes or no)	Yes		Yes	
If Shut-In, give date and oil/gas/ water rates of last production	Date: Rates:	Date: Retes:	Date: Rates:	
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	NA		NA	
If Producing, give date andoil/gas/ water rates of recent test (within 60 days)	Date: Rates: NA	Oste: Rates:	Date: Rates: NA	
8. Fixed Percentage Allocation Formula -% for each zone	on: *** Will be pro	ovided after well is dr Oi: % Gas: %	Oil: Gas: %	
9. If allocation formula is based a submit attachments with sun	upon something other than cu	errent or past production, or is I	based upon some other method	
 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 X No No 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? 				
11. Will cross-flow occur? Yes X 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? X Yes No				
13. Will the value of production be decreased by commingling? Yes X No (If Yes, attach explanation)				
 If this well is on, or communit United States Bureau of Land 	tized with, state or federal lan ⊦Management has been notific	nds, either the Commissioner of ed in writing of this application	Public Lands or the	
15. NMOCD Reference Cases for	Rule 303(D) Exceptions:	ORDER NO(S).		
* For zones with no report allowed to support allow	or each zone for at least one yproduction history, estimated ocation method or formula.	its spacing unit and acreage developer. (If not available, attach expression rates and supporting interests for uncommon interests for uncommon interests for uncommingling the support commingling interests.)	xplanation.) g data.	
I hereby certify that the information above is true and complete to the best of my knowledge and belief. SIGNATURE				
SIGNATURE Ologe	Thank	TITLE Engineer	DATE7/20/98	
	,			

George F. Sharpe

TYPE OR PRINT NAME