DATE	10/25/90	BUSPENSE ///15/99 ENGINEER DC LOODED BY W TYPE DHC
		ABOVE THIS LINE FOR DIVISION USE ONLY
		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 2040 South Pacheco, Santa Fe, NM 87505
		ADMINISTRATIVE APPLICATION COVERSHEET
τι	HIS COVERSHEET IS	S MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
Appl	[PC-Po	ms: [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] thole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] ol Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Sait Water Disposal] [IPI-Injection Pressure Increase] ified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF A [A]	PPLICATION - Check Those Which Apply for [A] Image: Boost Check Those Which Apply for [A] Location - Spacing Unit - Directional Drilling Image: Directional Drilling
	Chec [B]	k One Only for [B] or [C] Commingling - Storage - Measurement X DHC CTB PLC PC OLS OLM
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
[2]	NOTIFICAT [A]	FION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners
	[B]	Goffset Operators, Leaseholders or Surface Owner
	[C]	Application is One Which Requires Published Legal Notice
	[D]	U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E]	G For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F]	U Waivers are Attached
[3]	INFORMAT	ION / DATA SUBMITTED IS COMPLETE - Certification

7

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. <u>I understand that any omission of data</u> (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.

Mark Stodola	March Stodola	Reservoir Engr.
Print or Type Name	Signature	Title

10/22/	/99
--------	-----

Date

DISTRICT
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**

APPLICATION FOR DOWNHOLE COMMINGLING

)7-A 2-96
APPROVAL	. PR	00	ESS:

x Administrative Hearing

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

EXISTING WELLBORE X_YES __NO

Phillips	Petroleum	Company
Operator		

Farmington, New Mexico 87401 5525 Hwy 64.

No No No

San Juan 29-6 Unit #51 A Lease

D, Section 31, T 29N, R6W Rio Arriba County, NM Unit Ltr. - Sec - Twp - Rge County Mall No Spacing Unit Lease Types: (check 1 or more)

30-039-21088 009257 Federal X_, State OGRID NO. 017654 , (and/or) Fee API NO. Property Code

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	72439 S. Blanco PC, Ext.		72319 Blanco Mesaverde
2. Top and Bottom of Pay Section (Perforations)	3,653' - 3,836'		5,270' - 5,860'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	flowing		Flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	a. (Current) 1103 psig	a.	a. 303 psig (24 hr)
Estimated Current Gas & Oil - Flowing; Measured Current All Gas Zones: Estimated Or Measured Original	b.^(Original) 1200 psi (est.)	b.	^{b.} 1280 psi (est.)
6. Oil Gravity ([°] API) or Gas BTU Content	1100 btu/scf		1200 btu/scf
7. Producing or Shut-In?	Producing		shut-in
Production Marginal? (yes or no)	Yes		Yes
 If Shut-In, give date and oil/gas/ water rates of last production Note: For new zones with no production history, applicant shall be required to statch production 	Date: Rates:	Date: Rates:	Date: 7/31/99 Rates: 279 mcfd, 1 bwpd
estimates and supporting data • If Producing, give date andoil/gas/ water rates of recent test {within 60 days}	Date: 10/14/99 Rates: 300 mcfd	Date: Rates:	Date: Rates:
8. Fixed Percentage Allocation Formula -% for each zone	Oil: Gas: %	Olii: Gas: % %	Oil: Gas: %

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? If not, 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? Yes <u>X</u> Yes ___ Yes

If yes, are fluids compatible, will the formations not be damaged, will any cross-11. Will cross-flow occur? Yes X No flowed production be recovered, and will the allocation formula be reliable. ___ No (If No, attach explanation) _Yes _

ORDER NO(S).

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? (If Yes, attach explanation) _Yes <u>x</u> No

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. NMOCD Reference Cases for Rule 303(D) Exceptions:

16. ATTACHMENTS

IMENTS:
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. 1

SIGNATURE	Mark	Stodala

TITLE Reservoir Engr.

R-11187

TYPE OR PRINT NAME __Mark Stodola

TELEPHONE NO. (505) 599-3455

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PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401 5525 HWY. 64 NBU 3004

October 22, 1999

New Mexico Oil & Gas Conservation Div. 2040 South Pacheco Santa Fe, New Mexico 87505-6429

> Downhole Commingling Allocation Method on the San Juan 29-6 Unit #51A

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for between six and twelve months after actual commingling occurs. After a six to twelve month period we will convert to the ratio method as indicated in our commingling application. We believe this will be a more accurate method of allocating production considering that the Mesaverde interval has been producing for years and that the production will not be stabilized on the Pictured Cliffs for several months.

Pictured Cliffs Forecast

December 1999	8,471	January 2000	8,364
February 2000	7,464	March 2000	8,166
April 2000	7,806	May 1999	7,967
June 2000	7,722	July 2000	7,774
August 2000	7,679	September 2000	7,443
October 2000	7,494	November 2000	7,265

For example, if the total volume for January 2000 were 16,734 mcf, then the Pictured Cliffs would be allocated 8,364 mcf and the Mesaverde 8,370 mcf. And subsequently, the Pictured Cliffs would be allocated (8,364/16,734) or 49.98 %, and Mesaverde would be allocated (8,370/16,734) or 50.02%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark W. Stodola Reservoir Engineer

MS/pc

cc: OCD – Aztec BLM- Farmington NM Commissioner of Public Lands – Santa Fe PHILLIPS PETROLEUM COMPANY 5525 HWY 64 NBU 3004 FARMINGTON, NEW MEXICO 87401

WELL NAME: SAN JUAN 29-6 # 51A FORMATION: MESA VERDE

DATE: JUNE 3, 1999

TYPE TEST: STATIC GRADIENT

220

COUNTY: RIO ARRIBA STATE: NEW MEXICO

. . . .

> TOTAL DEPTH: CASING PRESSURE: PERFS: то TUBING PRESSURE: TUBING SIZE: 2 3/8 TO 5842' OIL LEVEL: 5709' WATER LEVEL: CASING SIZE: TO PACKER: TEMPERATURE: OTHER: SN @ 5812' ELEMENT NO. ENGAGED @ 10:05 ELEMENT RANGE 0 TO 3500

WELL STATUS: SHUT IN

DEPTH IN	PRESSURE	GRADIENT	
FEET	PSIG	PSI/FOOT	
0	215		
2000	228	0.006	
4000	242	0.007	
5412	251	0.007	
5612	253	0.010	
5812	303	0.250	

RAN SLM TO 5910'

H & H WIRELINE SERVICE INC. P. O. BOX 899 FLORA VISTA, NEW MEXICO 87415 **OPERATOR: STEVEN HODGES** UNIT NO. T-8



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> PHILLIPS PETROLEUM SAN JUAN 29-6 # 51A DATE: JUNE 3,1999

PHILLIPS PETROLEUM COMPANY 5525 HWY 64 NBU 3004 FARMINGTON, NEW MEXICO 87401

DATE: AUGUST 23, 1999

TYPE TEST: STATIC GRADIENT

WELL NAME: SAN JUAN 29-6 # 51A FORMATION: PICTURE CLIFF

COUNTY: RIO ARRIBA STATE: NEW MEXICO

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TOTAL DEPTH: PBTD 4196' CASING PRESSURE: PERFS: MP @ 3745' TUBING PRESSURE: 655 TUBING SIZE: 2 3/8 TO 3804' OIL LEVEL: 2351' CASING SIZE: TO WATER LEVEL: PACKER: **TEMPERATURE:** OTHER: 2.25 SN @ 3773' ELEMENT NO. ELEMENT RANGE 0 TO 3500 ENGAGED @ 09:10

WELL STATUS: SHUT IN

DEPTH IN	PRESSURE	GRADIENT
FEET	PSIG	PSI/FOOT
0	650	
1000	657	0.007
2000	662	0.005
3373	933	0.198
3573	1016	0.415
3773	1103	0.430

RAN TD @ 4179'

H & H WIRELINE SERVICE INC. P. O. BOX 899 FLORA VISTA, NEW MEXICO 87415 OPERATOR: STEVEN HODGES UNIT NO. T-10



PHILLIPS PETROLEUM SAN JUAN 29-6 # 51A DATE: AUGUST 23,1999

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MWST 1999/10/21 18:15



Pictured Cliffs Production

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Initial Production Rate	-	275 MCFD
Hyperbolic Exponent	=	0.33
Decline Rate	=	15.000 %

San Juan 29-6 #51A Pictured Cliffs Forecast

Month #	Days	Cum. Days	Initial q MCFD	Final q MCFD	Average q MCFD	Cum. MCF	Monthly MCF
Dec-99	31	31	275	272	273	8,471	8,471
Jan-00	31	62	272	268	270	16,835	8,364
Feb-00	28	90	268	265	267	24,300	7,464
Mar-00	31	121	265	262	263	32,466	8,166
Apr-00	30	151	262	259	260	40,271	7,806
May-00	31	182	259	255	257	48,238	7,967
Jun-00	30	212	255	252	254	55,960	7,722
Jul-00	31	243	252	249	251	63,734	7,774
Aug-00	31	274	249	246	248	71,413	7,679
Sep-00	30	305	246	243	245	78,856	7,443
Oct-00	31	336	243	240	242	86,350	7,494
Nov-00	30	366	240	238	239	93,615	7,265
Dec-00	31	397	238	235	236	100,931	7,316
Jan-01	31	428	235	232	233	108,159	7,228
Feb-01	28	456	232	229	231	114,613	6,454
Mar-01	.31	487	229	227	228	121,678	7,065
Apr-01	30	518	227	224	225	128,528	6,850
May-01	31	549	224	221	223	135,427	6,900

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Exhibit 3.2

Production Allocation Methodology

- Adding New Zone to Existing Zone Initially Subtraction Method followed by Fixed Allocation Method
 - Subtraction Method (+/- 1st 12 months)

•_____

- Forecast production rate by month for existing zone utilizing established decline curve for zone
- Subtract forecasted rate from commingled rate to define new zone rate
- Utilize subtraction method for +/- 12 months until new zone rate stabilizes, then utilize fixed allocation method with current rates
- Fixed Allocation Method (after Subtraction Method)
 - Utilize forecasted rate from established decline curve for lower zone
 - Calculate upper zone rate by subtracting lower zone rate from commingled rate
 - Lower zone allocation = <u>Lower zone rate</u> Commingled rate
 - Upper zone allocation = (Commingled rate - Lower zone rate) / Commingled rate