

DATE IN 1/14/00	SUSPENSE 2/3/00	ENGINEER DC	LOGGED RV	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
- Engineering Bureau -

*2625*

**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]**

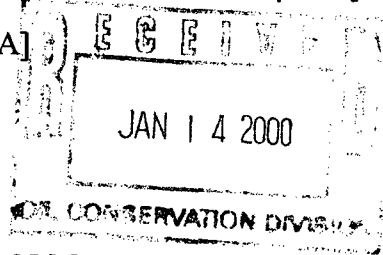
[A] Location - Spacing Unit - Directional Drilling  
NSL NSP DD SD

Check One Only for [B] and [C]

[B] Commingling - Storage - Measurement

X 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] X 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 Cole

*Peggy Cole*  
Signature

Regulatory/Compliance Administrator

Print or Type Name

Title

Date

DISTRICT I  
1625 N. Freygh Dr., Hobbs, NM 88240  
DISTRICT II  
811 South First St., Artesia, NM 88210  
DISTRICT III  
1000 Rio Brazos Rd, Aztec, NM 87410  
DISTRICT IV  
2040 S. Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

Form C-107-A  
Revised August 1999

APPROVAL PROCESS:

\_\_\_ Administrative \_\_\_ Hearing

EXISTING WELLBORE

\_\_X\_\_ YES \_\_ NO

APPLICATION FOR DOWNHOLE COMMINGLING

BURLINGTON RESOURCES OIL & GAS COMPANY

PO BOX 4289, FARMINGTON, NM 87499

Operator

Address

SAN JUAN 27-5 UNIT

20

A 35-27N-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 7454 API NO. 30-039-06844 Federal X 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	Tapacitos PICTURED CLIFFS-85920		BLANCO MESAVERDE - 72319
2. Top and Bottom of Pay Section (Perforations)	3448'-3468'		5418'-5738'
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: Gas & Oil - Flowing: All Gas Zones: Estimated Current Measured Current Estimated Or Measured Original	a. (Current) 395 psi (see attachment) b. (Original) 1053 psi (see attachment)		a. (Current) 585 psi (see attachment) b. (Original) 1304 psi (see attachment)
6. Oil Gravity (EAPI) or Gas BTU Content	BTU 1212		BTU 1239
7. Producing or Shut-In?	Producing		Producing
Production Marginal? (yes or no)	NO		YES
* If Shut-In, give date and oil/gas/water rates of last production	Date: N/A Rates:	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	Date: N/A Rates:	Date: N/A Rates:	Date: N/A Rates:
* If Producing, give date and oil/gas/water rates of recent test (within 60 days)			
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: % Gas: % WILL BE SUPPLIED UPON COMPLETION	Oil: % Gas: % WILL BE SUPPLIED UPON COMPLETION	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 \_\_\_X No  
If not, have all working, overriding, and royalty interests been notified by certified mail? \_\_\_ Yes \_\_\_X No

11. Will cross-flow occur? \_\_\_X 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. \_\_\_X 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)

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. \_\_\_X Yes \_\_\_ No

15. 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 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 *At Adson*

TITLE PRODUCTION ENGINEER

DATE: 1/12/00

TYPE OR PRINT NAME SCOTT DOBSON

TELEPHONE NO. 505-326-9700

NEW MEXICO  
OIL CONSERVATION COMMISSION

Form 17-124

WELL LOCATION AND/OR GAS PRORATION PLAT

APRIL 29, 1957

OPERATOR EL PASO NATURAL GAS COMPANY SAN JUAN 27-5 UNIT SP 079493-A

WELL NO. 20 (FM) SECTION 35 TOWNSHIP 27N RANGE 5W NMPM

LOCATED 800 FEET FROM NORTH LINE 990 FEET FROM EAST LINE

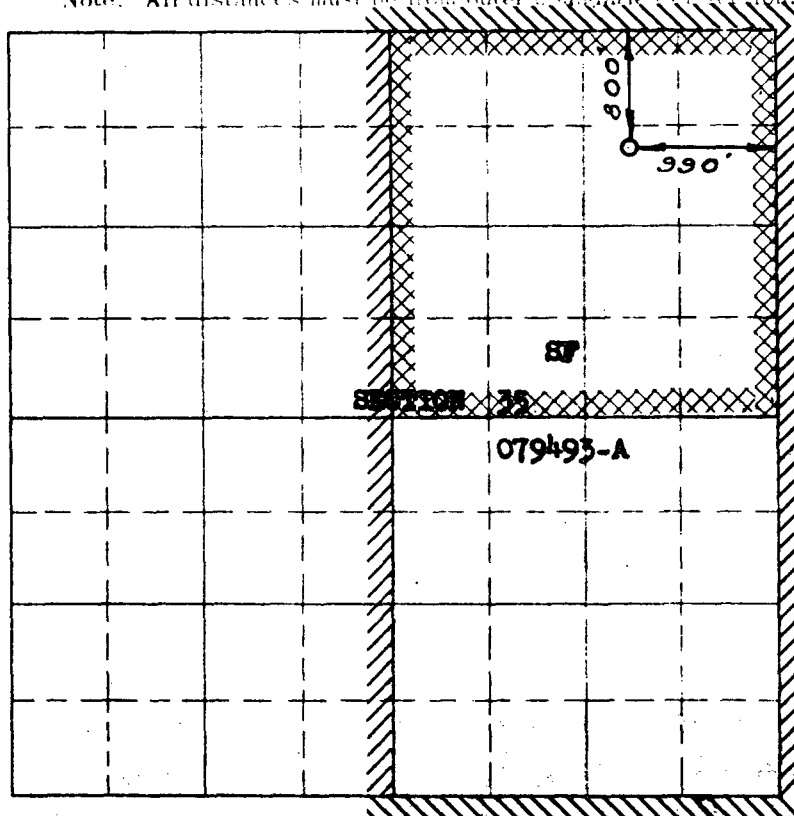
RIO ARRIBA

COUNTY, NEW MEXICO

6667

NAME OF SURVEYING FORMATION P.C. and M. V. WILSON P.C. 160 AC. P.C.  
BLANCO M.V. 320 AC. M.V.  
(1884 PLAT)

Note: All distances must be from outer boundaries of section.



RECEIVED  
MAY 1957  
SURVEY

NOTE

This section of  
form is to be used  
for gas wells only

This is to certify that the above plat was prepared from  
field notes of actual surveys made by me or under my  
supervision and that the same are true and correct to the  
best of my knowledge and belief.

Date Surveyed APRIL 8, 1957

D. C. Johnson  
Registered Professional Engineer and/or Land Surveyor



(Seal)

Farmington, New Mexico

1. Is this well a Dual Comp.

Yes ☒ No ☐

2. If the answer to Question 1  
is yes, are there any other dually  
completed wells within the  
dedicated acreage.

Yes ☐ No ☒

Original Signed D. C. Johnson

Name

Position Petroleum Engineer

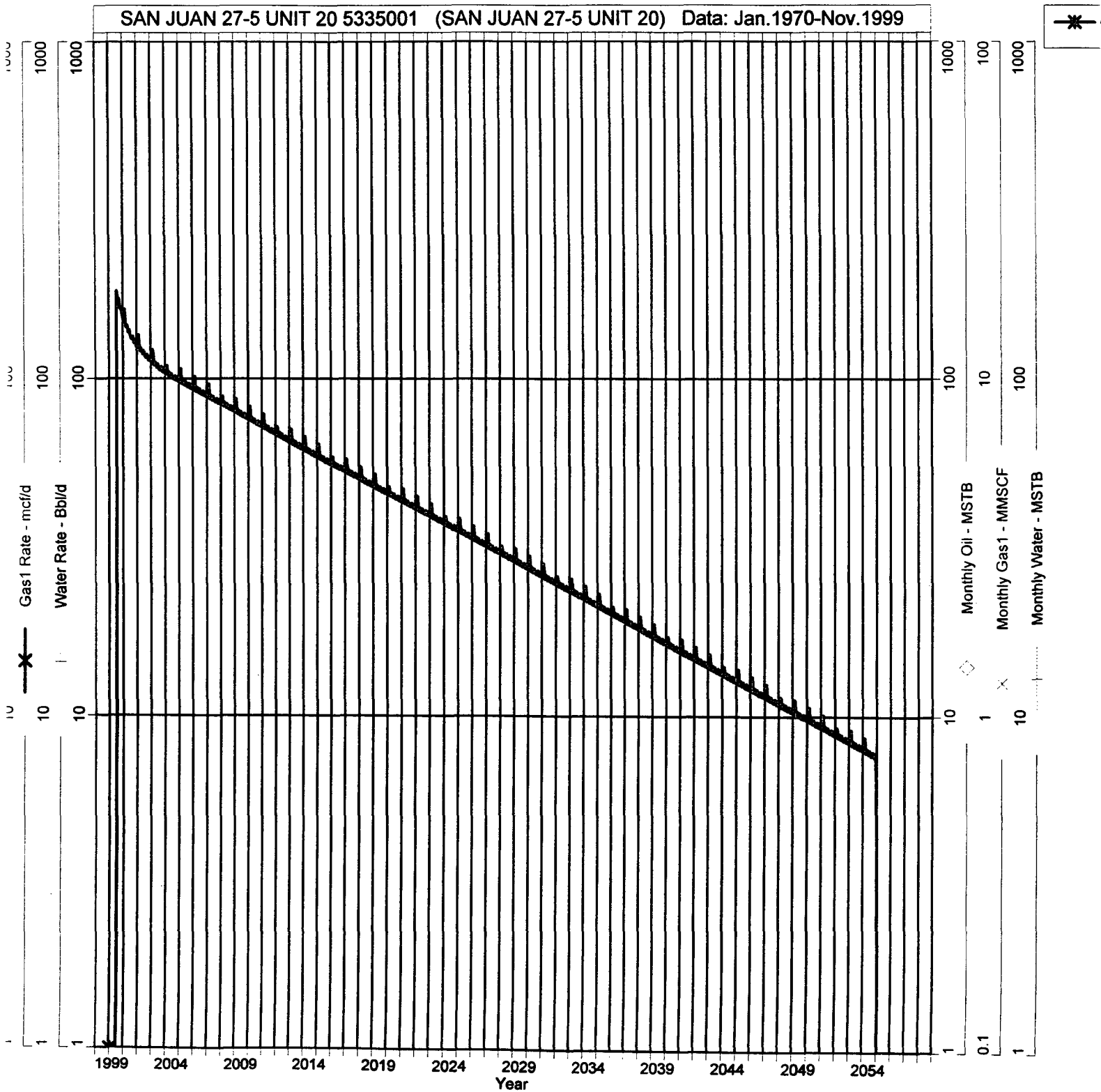
Representing El Paso Natural Gas

Address Box 997, Farmington, N.M.

# San Juan 27-5 Unit #20

Expected Production

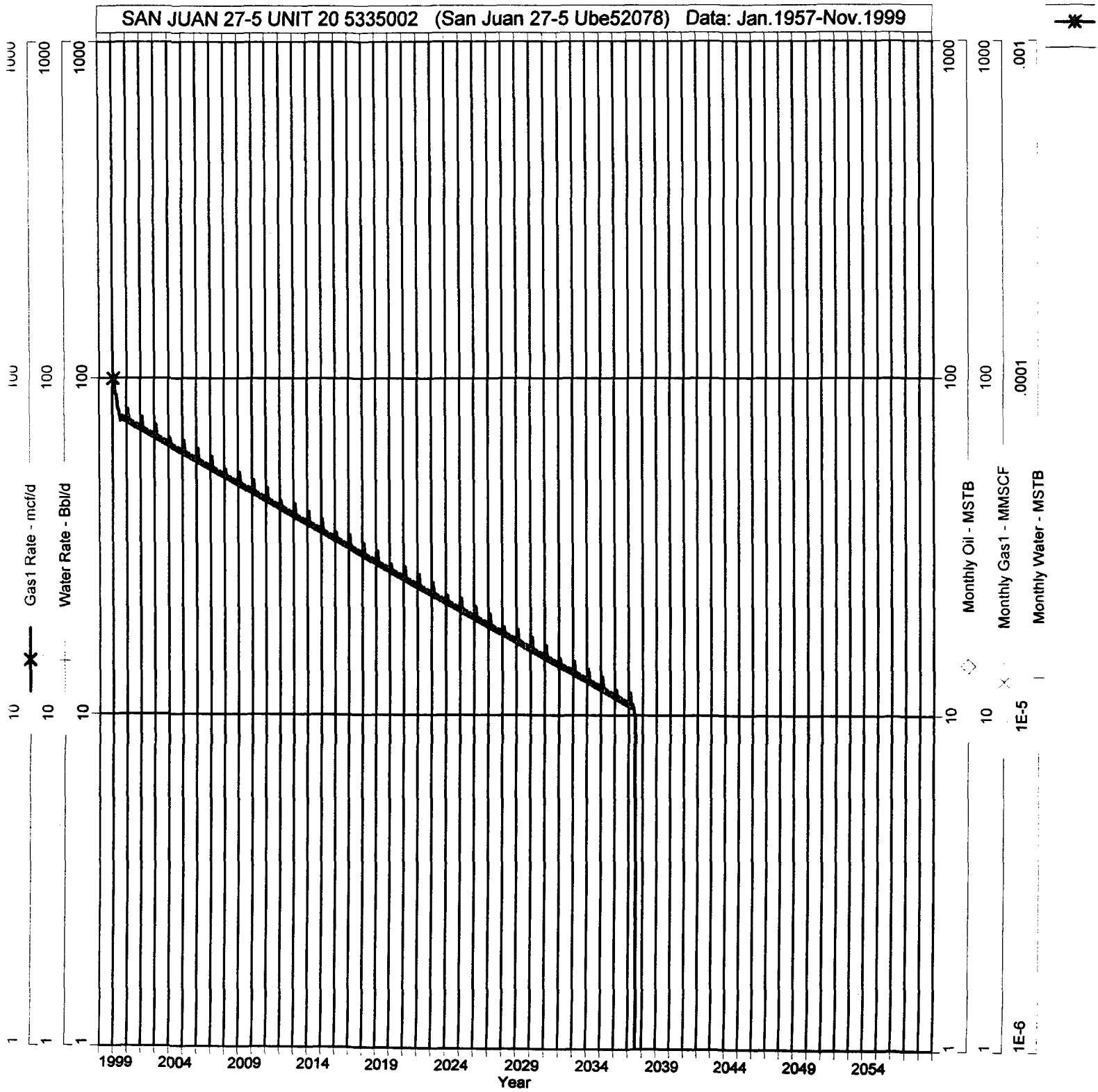
Pictured Cliffs Formation



San Juan 27-5 Unit #20

Expected Production

Mesaverde Formation



**San Juan 27-5 Unit #20**

Bottom Hole Pressures  
Flowing and Static BHP  
Cullender and Smith Method  
Version 1.0 3/13/94

<b>Pictured Cliffs</b>		<b>Mesaverde</b>	
<b><u>PC-Current</u></b>		<b><u>MV-Current</u></b>	
GAS GRAVITY	0.69	GAS GRAVITY	0.713
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.52	%N2	0.18
%CO2	0.19	%CO2	0.77
%H2S	0	%H2S	0
DIAMETER (IN)	1.66	DIAMETER (IN)	2.375
DEPTH (FT)	3441	DEPTH (FT)	5627
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	137	BOTTOMHOLE TEMPERATURE (DEG F)	198
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	363	SURFACE PRESSURE (PSIA)	509
BOTTOMHOLE PRESSURE (PSIA)	395.2	BOTTOMHOLE PRESSURE (PSIA)	584.8
<b><u>PC-Original</u></b>		<b><u>MV-Original</u></b>	
GAS GRAVITY	0.69	GAS GRAVITY	0.713
COND. OR MISC. (C/M)	C	COND. OR MISC. (C/M)	C
%N2	0.52	%N2	0.18
%CO2	0.19	%CO2	0.77
%H2S	0	%H2S	0
DIAMETER (IN)	1.66	DIAMETER (IN)	2.375
DEPTH (FT)	3441	DEPTH (FT)	5627
SURFACE TEMPERATURE (DEG F)	60	SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	137	BOTTOMHOLE TEMPERATURE (DEG F)	198
FLOWRATE (MCFPD)	0	FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	958	SURFACE PRESSURE (PSIA)	1120
BOTTOMHOLE PRESSURE (PSIA)	1052.8	BOTTOMHOLE PRESSURE (PSIA)	1304.2

Page No.: 1

Print Time: Thu Dec 30 13:36:11 1999

Property ID: 1425

Property Name: SAN JUAN 27-5 UNIT | 28 | 53358A

Table Name: R:\RESERVES\GDPNOS\TEST.DBF

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

08/04/58	0	958.0
09/03/58	0	957.0
12/22/59	306000	825.0
05/29/60	441000	749.0
12/20/61	882000	641.0
03/07/62	916000	640.0
04/19/63	1096000	615.0
10/14/64	1311000	598.0
05/10/65	1356000	583.0
09/02/66	1499000	563.0
10/31/67	1607000	548.0
05/02/68	1634000	569.0
01/01/69	0	1169.0
05/29/69	1762399	506.0
08/28/70	1869230	503.0
04/08/71	1935586	468.0
08/09/72	2068080	452.0
05/16/73	2148300	410.0
07/31/74	2247966	376.0
07/12/76	2423108	312.0
01/07/78	2516076	329.0
11/07/78	2540160	329.0
06/04/80	2634437	287.0
11/01/82	2673612	320.0
06/20/84	2681041	351.0
03/03/87	2702129	351.0
09/08/89	2723295	342.0
09/12/91	2732990	363.0

San Juan 27-5 Unit #20

Pictured Cliffs Offset

Page No.: 2  
 Print Time: Thu Dec 30 13:36:12 1999  
 Property ID: 1426  
 Property Name: SAN JUAN 27-5 UNIT | 28 | 53358B  
 Table Name: R:\RESERVES\GDPNOS\TEST.DBF

--DATE-- ---CUM GAS-- M SIWHP  
 ::::: MCF ::::: PSI :::::

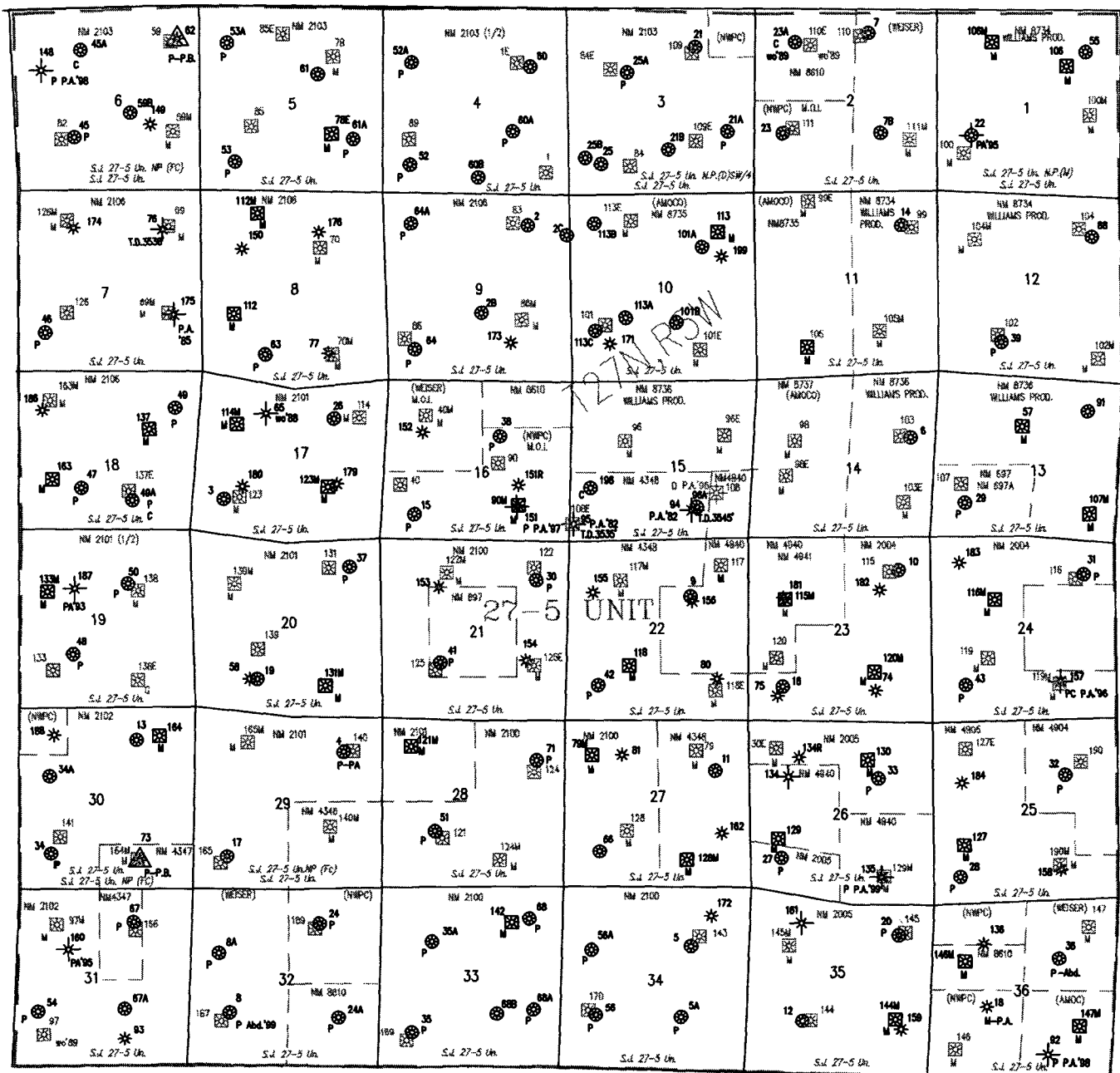
08/04/58	0	1120.0
08/27/58	0	1119.0
09/22/59	57000	806.0
05/29/60	93000	727.0
05/28/61	130000	714.0
03/07/62	145000	773.0
04/12/63	163000	781.0
05/07/64	178000	762.0
05/10/65	193000	755.0
04/19/66	225000	637.0
05/16/67	255000	571.0
05/02/68	274000	608.0
08/28/70	310451	612.0
11/09/70	312556	629.0
04/08/71	318185	606.0
08/09/72	336882	578.0
12/06/83	485355	561.0
10/20/86	513366	513.0
09/08/89	538192	510.0
05/06/91	554109	521.0
05/20/91	554067	509.0

San Juan 27-5 Unit #20

Mesaverde Offset



27N – 5W – 35A



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.

RIO ARRIBA

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. Catnach 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) One 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 commingling (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 Tapacino-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 Picured 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 Picured 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-Frontland 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 27-5 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 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;

CASE NO. 11626  
Order No. R-10694  
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- 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 C-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 Piedmont Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit, San Juan County New Mexico, is hereby approved.

CASE NO. 11626  
Order No. R-10694  
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(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 submission 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 J. LEMAY  
Director