OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

AMENDED COMMINGLING ORDER PC-936 (SECOND AMENDMENT)

Dugan Production Corporation P.O. Box 420 Farmington, New Mexico 87499-0420

Attention: Mr. John D. Roe

LEASE:

Federal Lease No.SF-078937 containing well completions in the Davis Federal

Well No.1 and communitization agreements covering the Platero Navajo Well

Nos.1 and 2

N/2+

DESCRIPTION:

NW/4 SW/4 (Gallup) and S/2 (Dakota) of Section 24,

and W/2 of Section 13, Township 26 North, Range 11 West,

NMPM, San Juan County, New Mexico

The above-named company is hereby authorized to commingle Gallegos Gallup (Associated - 26980) and Basin Dakota (Prorated Gas - 71599) Pool gas production in a common CPD sales meter and to determine production from each pool by separately metering the production from each well prior to commingling. Allocation of gas production shall be determined using factors derived by dividing the individual meter volumes by the sum of such metered volumes and multiplying by the CPD sales meter volume.

FURTHER: The liquid production shall be separated and stored at individual well locations. Commingled gas production shall be sold at the Davis Federal CPD sales meter located in Unit Letter 'L', Section 24, Township 26 North, Range 11 West, NMPM, San Juan County, New Mexico.

PROVIDING: The operator shall notify the Aztec District Office of the Division upon implementation of the commingling process.

NOTE: This installation shall be installed and operated in accordance with the applicable provisions of Rule 303 of the Division Rules and Regulations and the Division "Manual for the Installation and Operation of Commingling Facilities." It is the responsibility of the producer to notify the transporter of this commingling authority.

DONE at Santa Fe, New Mexico, on this 3rd day of October, 1997

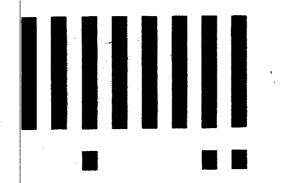
WILLIAM J. LEMAY, Director

WJL/BES

cc:

Oil Conservation Division- Aztec

Bureau of Land Management - Farmington



T LTR



Job separation sheet





JUL 29 KOT

Mr. Bill LeMay, Director New Mexico Oil Conservation Div. 2040 South Pacheco St. Santa Fe, NM 87505 Mr. Duane Spencer, Fluid Minerals, Br. Mgr. Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

Re: Surface Commingling
Proposed Davis Central Gas Delivery System
Dugan Production Corp.'s
Davis Federal No. 1 and Platero Navajo Wells No. 1 and 2
Federal Lease No. SF078937 & Navajo Allotted Leases No. 14-20-603-1445 (CA SW-64)
and 14-20-603-1443 (CA SW-65)
San Juan County, New Mexico

Dear Mr. LeMay and Mr. Spencer:

We are writing to request your administrative approval for the proposed surface commingling of natural gas production from the subject 3 wells; all are operated by Dugan Production.

Attachments No. 1 and No. 2 present these 3 wells along with their respective spacing units, completion and lease information. All 3 wells are located on Federal lease SF 078937 and are completed in the Basin Dakota gas pool. In addition, one well, the Davis Federal No. 1 is also dually completed in the Gallegos Gallup oil pool. The proposed surface commingling of natural gas entails converting the existing gas sales meter for Dugan's Davis Federal No. 1 to a central delivery sales meter for the Davis Federal No. 1 (Gallup and Dakota), plus the Platero Navajo wells No. 1 and 2 and will allow the use of one central compressor located at the Davis Federal No. 1, will eliminate the operation of 2 wellhead compressors (currently at the Platero Navajo No. 1 and 2) along with their associated expenses (approximately \$2,340/month), will reduce lease fuel requirements (and correspondingly increase gas sales) by approximately 16 MCFD, and most importantly, hopefully will allow each well to be more efficiently produced, thereby increasing the ultimate recoveries of oil and gas.

Currently each well is connected to El Paso Field Service's system with a gas sales meter located at each well. Pipeline pressures range from 175 to 250 psi and have been as high as 400 psi which has had a tremendous affect upon each wells ability to produce considering that each well has been producing for approximately 35 years. Attachments No. 3 thru 6 present the production histories for each completion and exhibit the erratic production that has occurred as a result of the

high and fluctuating pipeline pressures. Dugan Production has recently installed wellhead compressors on each well which has provided a fairly substantial production increase for all 4 completions (ranging from 229 MCF/month to 3531 MCF/month). Attachment No. 7 presents monthly production data for all 4 Completions prior to and subsequent to the compressor installations. In addition to increasing gas production a total of 6416 MCF/month, condensate production on the Davis Federal No. 1 Gallup also increased from 11 to 22 bbl/month, however the other 3 completions had either no change or a reduction in condensate production and condensate production month-to-month suggests that liquid loading is becoming more significant. Liquid loading is also evident as we are having more trouble keeping the wells flowing and they all are showing a greater tendency to log-off and die. We currently unload the Platero Navajo wells 2-6 times a month (we are reporting this gas as vented on our 3160's) which not only wastes gas but takes time and results in a very difficult compressor operation. Liquid loading on the Davis Federal No. 1 has not been as bad, however it is a problem and will become worse in the future. It is very likely that the Platero Navajo No. 1 and 2 wells will not be able to continue using wellhead compression unless some method of artificial lift such as a plunger is installed which will also create in a difficult wellhead compressor operation.

To deal with this increasing problem, we propose to use one compressor for all four completions and to alternate the unloading cycle so that only one well at a time is off. This hopefully will allow the wells to be produced more efficiently, will provide a better compressor operation, will allow 2 compressors to be removed from service which will increase gas sales by approximately 16 MCFD (currently being used as compressor fuel) and will allow the cost of operating the central compressor to be distributed between 4 completions which will lower individual well operating expenses and will allow for the recovery of increased oil and gas reserves. Attachment No. 8 presents the current lease equipment and corresponding fuel requirements. If our proposed CPD is approved, the compressor currently on the Davis Fed. No. 1 will be used for all 3 wells and the compressors on the Platero Navajo No. 1 and 2 wells will be removed from service.

Dugan Production has negotiated an arrangement with El Paso Field Services (EPFS) that will allow us to use their system for our operation which will include converting the existing sales meters at the Platero Navajo No. 1 and 2, plus the Davis Federal No. 1 (Gallup and Dakota commingled stream) to allocation meters and the currently idle meter, which had been the Davis Federal No. 1 Dakota sales meter prior to commingling the Gallup and Dakota gas streams (NMOCD amended order PC-936), will be converted to the Central Delivery Sales meter. All meters, including the proposed CPD meter are located on Federal lease SF 078937, and will be maintained according to NMOCD and BLM regulations (Allocation meters by Dugan and CPD meter by EPFS). All liquid hydrocarbons and water will continue to be separated, stored and sold at each well as it has been. Only the natural gas will be commingled after being measured at the allocation meter. Gas sales volumes and revenues will be allocated from the CPD meter to each completion based upon allocation factors and procedures set out on attachment No. 9. The gas system integrity will be periodically monitored using DPC's gas detector.

The gas from each completion is compatible and very similar in composition. Attachments No. 10

The gas from each completion is compatible and very similar in composition. Attachments No. 10 thru 13 present representative analysis from each completion and individual gas samples will continue to be taken to insure the accurate allocation of BTU's.

The interest ownership is presented on Attachment No. 14 and all interest owners have received notice of this proposal. Attachment No. 15 presents the letters providing notice to our working and overriding royalty interest owners. All royalty interest is either federal or Navajo Allotted and subject to BLM approval. Dugan Production Corp. is the operator of all 3 wells and holds a 100% working interest in the Davis Federal No. 1 (Gallup and Dakota), plus a 50% working interest in the Platero Navajo No. 1 and 2 wells.

In summary, Dugan Production proposes to use one compressor to operate 3 wells all of which are located on Federal Lease SF078937. Two of the wells have Navajo Allotted leases included in their communitized 320 acre Dakota spacing units. All 3 wells were recently equipped with wellhead compressors and have demonstrated increases in gas production rates. Liquid loading is occurring in each well and it is very difficult to keep the wells flowing through the wellhead compressors. We propose to convert the Davis Federal No. 1 (commingled Gallup and Dakota) sales meter to a CPD which will allow the compressor at the Davis Federal No. 1 to also serve the Platero Navajo No. 1 and 2. Existing gas sales meters at the Navajo Platero No. 1 and 2 and the idle Davis Federal No. 1 Dakota sales meter will serve as allocation meters which will help to insure the accurate allocation of CPD gas sales volumes and revenues to each well. Only the gas will be commingled and all liquid production will continue to be stored and sold from each individual well.

Should you have questions or need additional information, please let me know.

Sincerely,

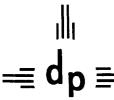
John D. Roe

Engineering Manager

John D. Roe

JDR/tmf

attachments





October 13, 1997

COT 15 15

Mr. Ben Stone New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Re: NMOCD Amended Commingling order PC-936 (2nd Amendment)
Dugan's Federal Lease SF-078937
Davis Federal No. 1 (Gallegos Gallup & Basin Dakota)
Plus Platero Navajo wells No. 1 & 2 (Basin Dakota)

Dear Mr. Stone:

The acreage description of the captioned amended order dated 10-3-97 did not include the N/2 of Section 24 for the Dakota. Since our application and the lease description of your order does include the Platero Navajo No. 1 well and the Dakota spacing unit for this well is the N/2 of Section 24, it appears that the N/2 description was simply left out.

I have noted this on our copy of this order (copy attached) and do not see the need for an additional amendment if you'll see that a similar note is made for NMOCD's records.

Please let me know if I can help in any way. Thank you for your efforts in this matter.

Sincerely,

John D. Roe

Engineering Manager

John D Roe

JDR/tmf

attach.

Insert

Color Page/Photo

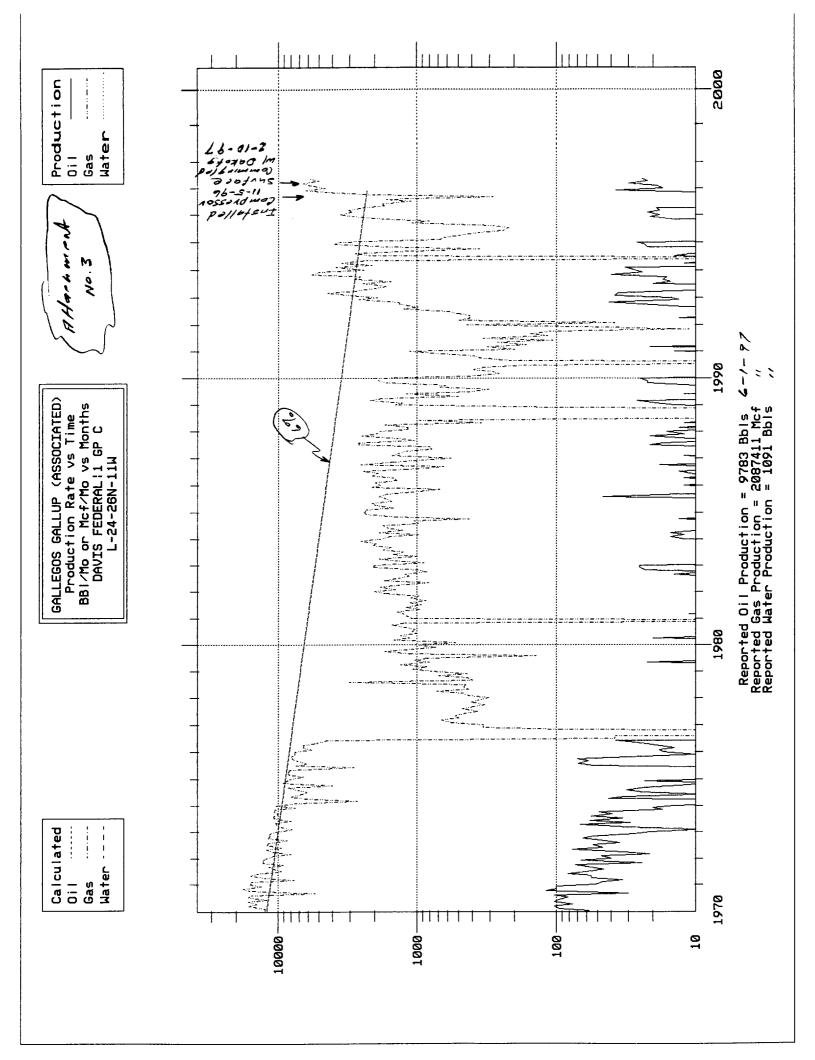
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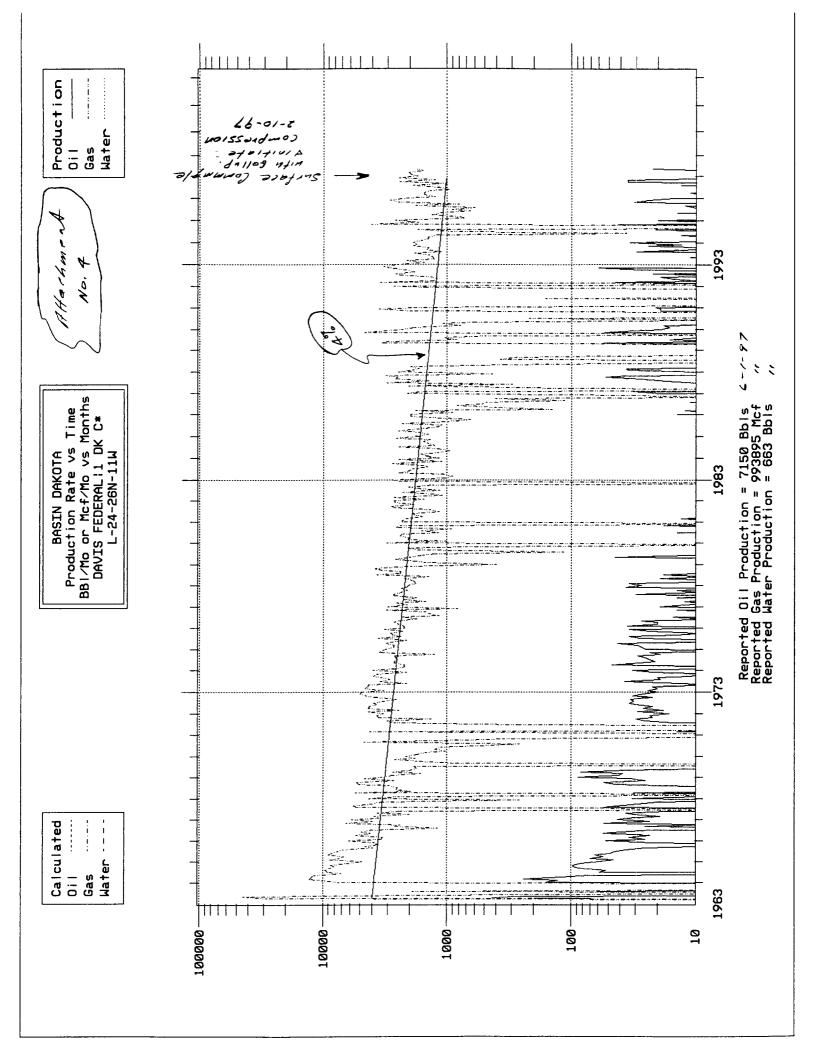
ATTACHMENT NO. 2 DUGAN PRODUCTION CORP. PROPOSED DAVIS C.P.D. SAN JUAN COUNTY, NEW MEXICO

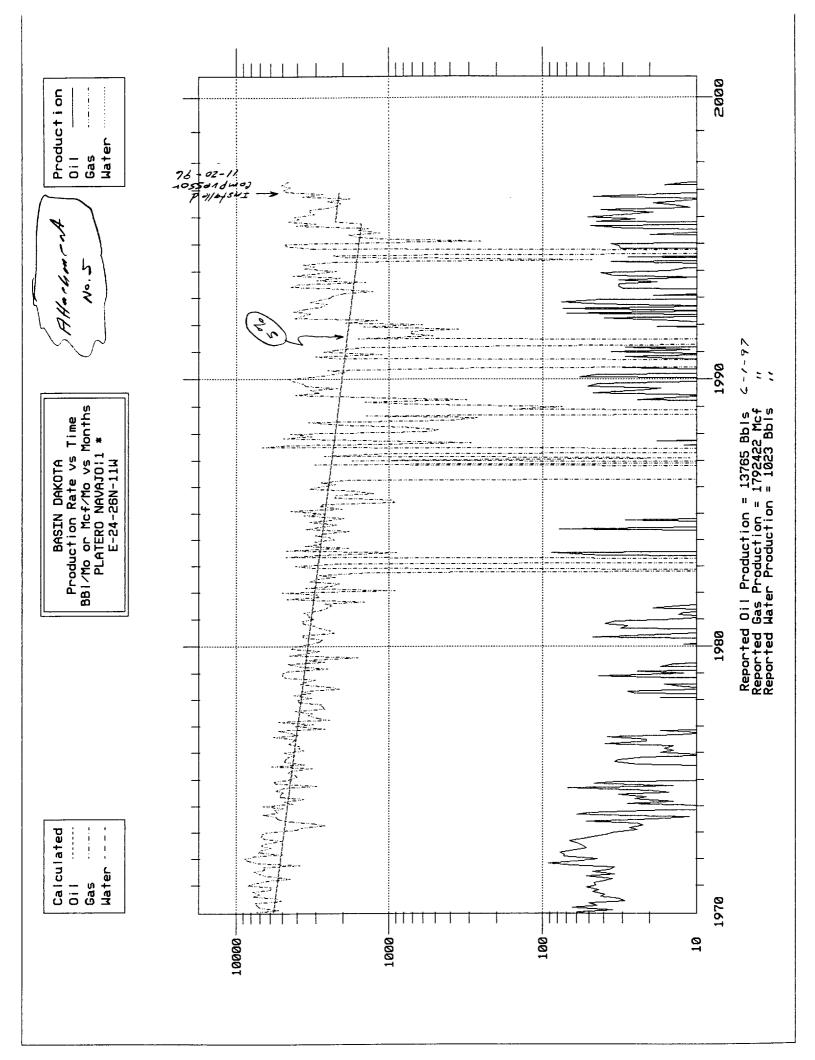
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Well	Wel	Well Location	Lease	Type	Agreement		Completion 1st 5 months 1997	1st 5 mon	1997 ths	Spacing
Name	% %	14 14 Sec-Twn-Rng Number	Number	Lease	Number	Pool	Date	ВОРО	MCFD	Unit
Davis Federal #1 GA NWSW 24-26N-11W SF078937 Fed.	NWSW	24-26N-11W	SF078937	Fed.	N/A	Gallegos Gallup	8/21/62	0.8	192	192 NWSW-40A
Davis Federal #1 DK NWSW 24-26N-11W SF078937 Fed.	NWSW	24-26N-11W	SF078937		N/A	Basin Dakota Gas 8/21/62	8/21/62	0.3	63	63 S/2-320A
Platero Navajo #1	SWNW	SWNW 24-26N-11W SF078937 Fed.	SF078937	Fed.	SW-64(1)	Basin Dakota Gas 8/9/62	8/9/62	0.2	157	157 N/2-320A
Platero Navajo #2	SWSW	SWSW 13-26N-11W SF078937 Fed.	SF078937		SW-65(2)	Basin Dakota Gas 7/27/62	7/27/62	0.3	64	64 W/2-320A

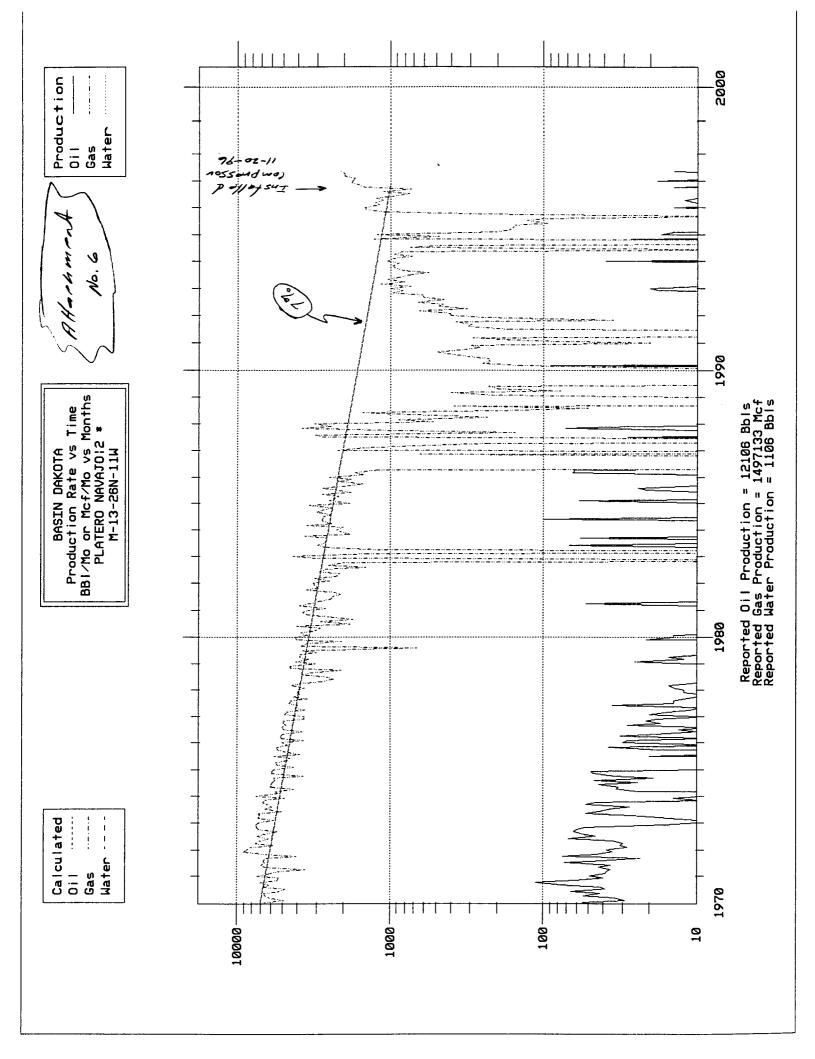
N/A - Not Applicable

- (1)- Communitization Agreement SW-64, effective 6/22/62, communitizes the NW/4 (160A) Federal lease SF 078937 with the NE/4 (160A) of Navajo Allotted lease 14-20-603-1445 to form a 320 acre Dakota spacing unit.
- (2)- Communitization Agreement SW-65, effective 6/1/62, communitizes the SW/4 (160A) Federal lease SF 078937 with the NW/4 (160A) of Navajo Allotted lease 14-20-603-1443, to form a 320 acre Dakota spacing unit.









AHo chonont No. 7

Gos + Condonsofe Production proposed Davis CPO System

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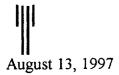
ATTACHMENT NO. 8
GAS USED ON LEASE ①
DUGAN PRODUCTION CORP.
PROPOSED DAVIS CPD
SAN JUAN COUNTY, NEW MEXICO

			Lease Equipment	ınt		Gas Purged to U	Gas Purged to Unload Accumulated Liquids	ed Liquids
	Separator	HP of	HP of	Lease Fue	Lease Fuel MCFD(2)	Normal	Average	MCF
Well	Burner	Pump Unit	Compressor	Summer	Winter	Tubing	Wellhead	þe
Name	BTU/hr	Engine	Engine	Months	Months	Size -Inch	Press - psia	Cycle
WELLS TO BE ADDED TO SYSTEM	TO SYSTEM							
Davis Federal #1 GA	250M		9	15.1	17.0	11/2	300	1.66
Davis Federal #1 DK	Note(3)	1	Note(3)	Note(3)	Note(3)	11/2	300	1.84
Platero Navajo #1	250M	100 00 00	32	8.1	9.5	2-3/8	320	3.08
Platero Navajo #2	250M		32	8.1	9.5	11/2	306	1.84

Notes

- Data reflects information as of 7-1-97. As descriptions & or equipment change, fuel uses will also change. \subseteq
- Summer Months = May thru October. Winter Months = November thru April. Lease fuel is calculated from stated burner requirements and horsepower. (N)
- Gallup & Dakota production commingled at the surface 2/10/97 under NMOCD Amended Order PC-936 dated 1/15/97. Fuel for lease equipment is allocated between the Gallup & Dakota zones using current allocation factors. <u>ල</u>





To: NMOCD, Working & Royalty Interest Owners (address list attached)
Dugan's proposed Davis CPD

Re: Revised attachment to
7-28-97 Surface Commingling Application
Proposed Davis Central Gas Delivery System
Davis Federal No. 1 and Platero Navajo Wells No. 1 and 2
Federal Lease No. SF078937 and Navajo Allotted Leases
No. 14-20-603-1445 (CA SW-64), and 14-20-603-1443 (CA SW-65)
San Juan County, NM

Gentlemen:

Enclosed is Attachment No. 9 for the subject application which has been revised to correct formula No. 2 for Allocated Individual Well BTU's.

Please call if you have questions.

Sincerely,

John D. Re

John D. Roe Engineering Manager

JDR/tmf

attachments

Attachment No. 9 (Revised) Proposed Allocation Procedures Dugan Production Corp.'s Proposed Davis Federal CPD NW SW 24, T-26-N, R-11-W San Juan County, New Mexico

Base Data:

W=Volume (MCF) from Well Allocation Meter X=Volume (MCF) from CPD Sales Meter Y=BTU's from CPD Sales Meter Z=Gas Revenue (\$) from CPD Sales Meter

- 1. Individual Well Production = A+B+C+D+E
 - A = Allocated Sales Volume, MCF.
 - $= (W/SUM W) \times X$
 - B = On lease fuel usage, MCF. Determined from equipment specifications and operating conditions.
 - C = Purged and/or vented gas from well and/or lease equipment, MCF. Calculated using equipment specifications and pressures.
 - D = Allocated fuel from gathering system equipment, MCF. The total fuel required to operate gathering system equipment will be allocated to the individual wells benefiting from the equipment using allocation factors determined by W / Sum W for the wells involved.
 - E = Allocated volume of gas lost and/or vented from the gathering system and/or gathering system equipment, MCF. The total volume will be determined using industry accepted procedures for the conditions existing at the time of the loss. All volumes corresponding to liquid condensation within the gathering system will also be determined. The total volume lost and/or vented will be allocated to the individual wells affected using factors determined by W / Sum W.
- Allocated Individual Well BTU's = ((W x Individual well BTU) / Sum (W x individual well BTU)) x Y.
 Individual well gas heating values to be determined in accordance with BLM's On Shore Order No. 5.
- 3. <u>Allocated Individual Well Gas Revenues</u> = (Allocated Individual well BTU's / Sum Allocated individual well BTU's) x Z

8/13/97 Letter Distribution Proposed Davis Central Gas Delivery System Dugan Production Corp.'s Davis Federal No. 1 & Platero Navajo Wells No. 1 and 2

Mr. Bill LeMay, Director New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Mr. Frank Chavez New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Royalty Interest Owner & Trustee for Navajo Allotted Royalty Owners

Mr. Duane Spencer, Fluid Minerals Branch Manager Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

Working Interest Owners

Burlington Resources Oil & Gas P. O. Box 4289 Farmington, NM 87499-4289

Conoco Inc. 10 Desta Dr. W., Suite 100W Midland, TX 79705

EL PASO NATURAL GAS COMPANY VOLUME ACCOUNTING DEPARTMENT MEASUREMENT DIVISION POST OFFICE BOX 1492 EL PASO, TEXAS 79978 PHONE: (915) 541-2595 CHROMATOGRAPHIC GAS ANALYSIS REPORT

DATE 8/09/96

MAILEE 26730

DUGAN PRODUCTION CORPORATION P 0 BOX 420 FARMINGTON, NM 87499-0420

AHarmon NO. 10

METER NUMBER 73550 - DAVIS FEDERAL #1 GL OPERATOR 1862 - DUGAN PRODUCTION CORP

3/20/96 3/19/96 7/01/96 ANALYSIS DATE SAMPLE DATE EFFECTIVE DATE EFFECTIVE FOR 6 MONTHS TYPE CODE H2S GRAINS LOCATION 2 - ACTUAL O

D - DANIELS FM

COMPONENTS	NORMALIZED MOL %	GPM
CO2	.89	.000
H2S	.00	.000
N2	.55	.000
METHANE	80.02	.000
ETHANE	10.07	2.694
PROPANE	5.26	1.450
ISO-BUTANE	.68	.222
NORM-BUTANE	1.38	.435
ISO-PENTANE	.38	.139
NORM-PENTANE	.33	.120
HEXANE PLUS	44	192
	100.00	5.252

.721 SPECIFIC GRAVITY MIXTURE HEATING VALUE (BTU @ 14.73 DRY) 1243 .000 RATIO OF SPECIFIC HEATS

NO TEST SECURED FOR H2S CONTENT

EL PASO NATURAL GAS COMPANY VOLUME ACCOUNTING DEPARTMENT MEASUREMENT DIVISION POST OFFICE BOX 1492 EL PASO, TEXAS 79978 PHONE: (915) 541-2595 CHROMATOGRAPHIC GAS ANALYSIS REPORT

DATE 8/09/96

AHachment NO.11

MAILEE 26730

DUGAN PRODUCTION CORPORATION P O BOX 420 FARMINGTON, NM 87499-0420

METER NUMBER 73460 - DAVIS FEDERAL #1 DK OPERATOR 1862 - DUGAN PRODUCTION CORP

ANALYSIS DATE SAMPLE DATE EFFECTIVE DATE EFFECTIVE FOR 3/20/96 3/19/96 7/01/96 6 MONTHS TYPE CODE H2S GRAINS LOCATION 2 - ACTUAL

D - DANIELS FM

	NORMALIZED	
COMPONENTS	MOL %	GPM
CO2	.72	.000
H2S	.00	.000
N2	1.07	.000
METHANE	79.95	.000
ETHANE	11.02	2.948
PROPANE	4.61	1.271
ISO-BUTANE	.62	.203
NORM-BUTANE	1.06	.334
ISO-PENTANE	.25	.092
NORM-PENTANE	.17	.062
HEXANE PLUS	.53	<u>.231</u>
	100.00	5.141

SPECIFIC GRAVITY .711 MIXTURE HEATING VALUE (BTU @ 14.73 DRY) 1222 RATIO OF SPECIFIC HEATS .000 NO TEST SECURED FOR H2S CONTENT

EL PASO NATURAL GAS COMPANY VOLUME ACCOUNTING DEPARTMENT MEASUREMENT DIVISION POST OFFICE BOX 1492 EL PASO, TEXAS 79978 PHONE: (915) 541-2595 CHROMATOGRAPHIC GAS ANALYSIS REPORT

AHachment NO.12

DATE 4/08/96

MAILEE 26730

DUGAN PRODUCTION CORPORATION P O BOX 420 FARMINGTON, NM 87499-0420

METER NUMBER 73461 - PLATERO NAVAJO #1 (DEPARTOR) 1862 - DUGAN PRODUCTION CORP (D = Kot =)

ANALYSIS DATE 3/20/96 SAMPLE DATE EFFECTIVE DATE EFFECTIVE FOR 3/19/96 4/01/96 6 MONTHS TYPE CODE H2S GRAINS LOCATION 2 - ACTUAL 0

D - DANIELS FM

COMPONENTS	NORMALIZED MOL %.	GPM
CO2	.73	.000
H2S	.00	.000
N2	1.18	.000
METHANE	75.26	.000
ETHANE	11.73	3.138
PROPANE	6.67	1.838
ISO-BUTANE	.99	.324
NORM-BUTANE	1.85	.583
ISO-PENTANE	.57	.209
NORM-PENTANE	.49	.177
HEXANE PLUS	53	231
	100.00	6.500

SPECIFIC GRAVITY .766 MIXTURE HEATING VALUE (BTU @ 14.73 DRY) 1306 RATIO OF SPECIFIC HEATS .000

NO TEST SECURED FOR H2S CONTENT

EL PASO NATURAL GAS COMPANY VOLUME ACCOUNTING DEPARTMENT MEASUREMENT DIVISION POST OFFICE BOX 1492 EL PASO, TEXAS 79978 PHONE: (915) 541-2595 CHROMATOGRAPHIC GAS ANALYSIS REPORT

19 Hackment No.13

DATE 8/09/96

MAILEE 26730

DUGAN PRODUCTION CORPORATION P O BOX 420 FARMINGTON, NM 87499-0420

METER NUMBER 73462 - PLATERO NAVAJO #2 (Dakofa)
OPERATOR 1862 - DUGAN PRODUCTION CORP

ANALYSIS DATE 3/20/96 SAMPLE DATE 3/19/96 EFFECTIVE DATE 7/01/96 EFFECTIVE FOR 12 MONTHS TYPE CODE 2 - ACTUAL H2S GRAINS 0 LOCATION D - DANIELS FM

COMPONENTS	NORMALIZED MOL %	GPM
CO2	.74	.000
H2S	.00	.000
N2	1.21	.000
METHANE	76.34	.000
ETHANE	11.44	3.060
PROPANE	6.33	1.745
ISO-BUTANE	.92	.301
NORM-BUTANE	1.70	.536
ISO-PENTANE	.45	.165
NORM-PENTANE	.39	.141
HEXANE PLUS	48	
	100.00	6.157

SPECIFIC GRAVITY .751

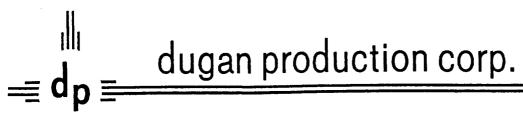
MIXTURE HEATING VALUE (BTU @ 14.73 DRY) 1283

RATIO OF SPECIFIC HEATS .000

NO TEST SECURED FOR H2S CONTENT

WELLS DELIVERING GAS TO DUGAN'S PROPOSED DAVIS CPD INTEREST OWNERSHIP ATTACHMENT NO. 14

	Davis Federal No.1 (GA & DK)	.1 (GA & DK)	Platero Navajo No. 1 & 2	Vo. 1 & 2
	%IM	%IN	%IM	%IN
Working Interest Owners				
Burlington Resources	0	0	25.00	17.50
Conoco, Inc.	0	0	25.00	17.50
Dugan Production Corp.	100	70.000	50.00	35.00
Royalty Interest Owners				
Minerals Management Service-Federal-C/O BLM	0	12.500	0	6.250
Minerals Management Service-Navajo Allotted-C/O BLM	0	0	0	6.250
Overriding Royalty Owners				
Charter Royalty Co.	0	0.750	0	0.3750
Collins Partners	0	0.750	0	0.3750
F. Farrell Davis	0	0.375	0	0.1875
Paul L. Davis	0	0.375	0	0.1875
Four Star Oil & Gas Co.	0	14.500	0	7.2500
Lucy Lawson	0	0.750	0	0.3750
Louis Dreyfus Natural Gas Cop.	0	0	0	2.1875
Marathon Oil Co.	0	0	0	2.1875
Wilson Oil	0	0	0	4.3750
TOTAL OWNEDSHIP	100		100 000	000
IOIAL OWINERSHIP	100.000	100.000	100.000	180.080





Alfarhment No.15 Pg1 of 3

To: Working Interest Owners (address list attached)
Dugan's Platero Navajo Wells No. 1 and 2
Unit E of Section 24, and Unit M of Section 13
Township 26N, R 11W
Federal Lease SF078937
San Juan County, New Mexico

Gentlemen:

Attached for your information, review and file is a copy of our application to the New Mexico Oil Conservation Division (NMOCD) and the Bureau of Land Management to surface commingle natural gas produced from the captioned jointly owned wells with natural gas produced from Dugan's Davis Federal No. 1. All three wells are located on Federal Lease SF078937, however the Platero Navajo wells also have Navajo Allotted leases within their spacing units.

We anticipate total expenditures related to this proposal to be minimal (approximately \$1,500.00) and less than the JOA expenditure limits on the Platero Navajo #1 and 2 wells. The compressors currently being used are being rented and thus monthly operating expenses for the Platero Navajo No. 1 and 2 wells will be reduced by approximately \$1,038.00/month per well, and the compressor at the Davis Federal No. 1 will be allocated to the 3 wells (4 completions) based upon volumes produced. In addition, lease fuel requirements will be reduced by approximately 16 MCFD which will correspondingly increase volumes available for sale.

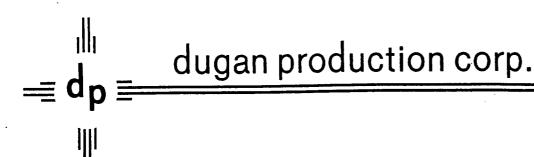
Should you have any questions, need additional information or have any concern as to our proposal, please let me know.

Sincerely,

John D. Roe

John D. Roe Engineering Manager

JDR/tmf



Affachment No. 15 Pgz of 3

July 28, 1997

To: Overriding Royalty Interest Owners (address list attached)

Dugan Production Corp.'s

Davis Federal No. 1 (L-24-26N-11W)

Platero Navajo No. 1 (E-24-26N-11W)

Platero Navajo No. 2 (M-13-26N-11W)

San Juan County, New Mexico

Gentlemen:

Dugan Production Corp. has filed an application with the New Mexico Oil Conservation Division (NMOCD) and the Bureau of Land Management (BLM) requesting their approvals to surface commingle natural gas produced from each of the 3 captioned wells. This will allow us to use one compressor for all 3 wells and will hopefully improve the production operations on each well. In addition, we will be able to remove 2 wellhead compressors from operation which will increase gas sales by approximately 16 MCFD (which is currently being consumed for compressor fuel), and the individual well operating expenses will be reduced which will in turn provide a lower economic limit and thus will increase the recoveries of oil and natural gas.

If approved, we will continue to meter the gas at each well, however the wellsite meter rather than being a sales meter, will be used to determine allocation factors for the sales volumes and revenues from the central delivery meter. This proposal should not reduce your interest or revenue flow, and may provide an increase in the current gas sales volumes as well as in ultimate recoveries.

We would be happy to provide a complete copy of our application should you desire to have it. Should you have questions, need additional information or have concerns, please let me know.

Sincerely,

John D. Roe

Engineering Manager

John D, Roce

JDR/tmf

Interest Owners Sheet1	
Davis Fed #1 and Platero Navajo #1 and #2	
Burlington Resources Oil & Gas	Altachm
P. O. Box 4289	
Farmington, NM 87499-4289	No. 15 Pg 3 of
Conoco, Inc.	
10 Desta Dr. W., Suite 100W	
Midland, TX 79705	
Minerals Management Service-Federal	
c/o Bureau of Land Management	
1235 La Plata Highway	
Farmington, NM 87499	
Minerals Management Service-Navajo Allotted	
c/o Bureau of Land Management	
1235 La Plata Highway	
Farmington, NM 87499	
Charter Royalty Company	
P. O. Box 2865	
Midland, TX 79702-2865	
Collins Partners, LTD	
5000 Burnet Road	
Austin, TX 78756	
F. Farrell Davis	
P. O. Box 3061	
Midland, TX 79702-3061 .	
Paul L. Davis, Jr.	
P. O. Box 1811	
Midland, TX 79702-1811	
Lucy E. Lawson	
P. O. Box 3786	
Midland, TX 79702-3786	
Louis Dreyfus Natural Gas Corp.	
P. O. Box 960116	
Oklahoma City, OK 73196-0116	
Marathon Oil Company	
P. O. Box 3128	
Houston, TX 77253-3128	
Wilson Oll Company LTD	
P. O. Box 1297	
Santa Fe, NM 87504-1297	
Four Star Oil & Gas Company	
P. O. Box 46513	
Denver, CO 80201-6513	





11

Mr. Frank Chavez New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Re: Surface Commingling

Proposed Davis Central Gas Delivery System

Dugan Production Corp.'s

Davis Federal No. 1 and Platero Navajo Wells No. 1 and 2

Federal Lease No. SF078937 & Navajo Allotted Leases No. 14-20-603-1445 (CA SW-64)

and 14-20-603-1443 (CA SW-65) San Juan County, New Mexico

Dear Mr. Chavez:

Attached for your information and file is a copy of the subject application. I inadvertently did not include the copy distribution on the letter. Copies of the complete application were also sent to the working and royalty interest owners and notice of our application was sent to the overriding royalty interest owners. Upon receiving the "return receipt" cards, I will provide copies to the NMOCD as evidence of notice.

Please let me know if you have questions or need additional information.

Sincerely,

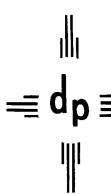
John D. Roe

Engineering Manager

John O, Roe

JDR/tmf

cc: Mr. Bill LeMay, NMOCD-Santa Fe



August 15, 1997

Mr. Bill LeMay New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Re: 7/28/97 Commingling Application
Proposed Davis Central Gas Delivery System
Dugan Production Corp.'s
Davis Federal No. 1 and Platero Navajo Wells No. 1 and 2
Federal Lease No. SF078937 & Navajo Allotted Leases No. 14-20-603-1445 (CA SW-64)
and 14-20-603-1443 (CA SW-65)
San Juan County, New Mexico

Dear Mr. LeMay:

Attached for your use and file, as evidence of notification, are copies of the certified mail receipts for each interest owner (working, royalty and overriding royalty) in the subject application.

Please let me know if you have any questions or need additional information.

Sincerely,

John D. Rac

John D. Roe Engineering Manager

JDR/tmf

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