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September 18, 2007

HAND DELIVERED

David K. Brooks, Esq.
Legal Examiner
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 98705

Re: Case 13933: Application of Burlington Resources
Oil & Gas Company, LP for approval of a
Pilot Sequestration Injection Well Project,
Basin Fruitland Coal Gas Pool,
San Juan County, New Mexico

RECEIVED
2007 SEP 18 PM 4:30

Dear Mr. Brooks,

You heard the referenced case on June 21, 2007 and at its conclusion took the case under advisement subject to Burlington providing (a) evidence notice to BP America and the Commissioner of Public Lands and (b) cement data for Mr. Ezeanyim's review of the C-108.

The cement data was provided to and received by Mr. Ezeanyim on July 23m 2007 (copies enclosed).

The evidence of notice to BP America is Mrs. Munds-Dry enclosed entry of appearance and the enclosed waiver from Mr. John Bemis, Assistant Commissioner of Public Lands.

Sincerely,



W. Thomas Kellahin



PATRICK H. LYONS
COMMISSIONER

State of New Mexico
Commissioner of Public Lands

310 OLD SANTA FE TRAIL
P.O. BOX 1148
SANTA FE, NEW MEXICO 87504-1148

COMMISSIONER'S OFFICE

Phone (505) 827-5760

Fax (505) 827-5766

www.nmstatelands.org

July 24, 2007

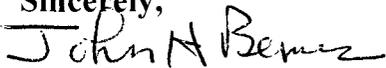
Mr. Mark Fesmire, P.E., Director
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: NMOCD Case 13933 Application of Burlington Resources Oil & Gas Company LP for approval of a Pilot Sequestration Injection Well Project, Basin Fruitland Coal Gas Pool San Juan County, New Mexico

Dear Mr. Fesmire:

On behalf of the Commission of Public Lands for New Mexico, I hereby waive notice of the hearing of this case held on June 21, 2007 in which Burlington Resources Oil & Gas Company LP seeks an order approving a pilot sequestration injection well project within a project area consisting of all of Section 32, T31N R8W, including the drilling of an CO2 injection well at an unorthodox location 2500 feet FNL and 2665 feet FWL (Unit F) of Section 32 for injection within an interval from 3123 feet to 3148 feet into the Fruitland formation of Basin Fruitland Coal Gas Pool, for the purpose of testing the feasibility of disposal of carbon dioxide as a alternative to the current practice of venting carbon dioxide to the atmosphere and to test the feasibility of enhancing methane production from offset wells.

Sincerely,


John Bemis

Assistant Commissioner

CC: W. Thomas Kellahin,
Attorney for Burlington

BEFORE THE
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. 13933

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS CO, L.P. FOR APPROVAL OF A
PILOT SEQUESTRATION INJECTION WELL PROJECT,
SAN JUAN COUNTY, NEW MEXICO.

ENTRY OF APPEARANCE

COMES NOW HOLLAND & HART, LLP and hereby enters its appearance in the
above referenced case on behalf of BP America Production Company.

Respectfully submitted,

HOLLAND & HART, LLP

By: *Ocean Munds-Dry*
OCEAN MUNDS-DRY
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

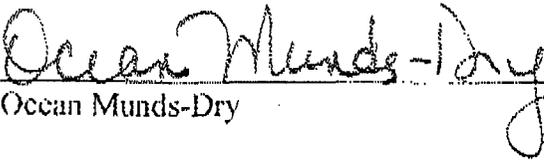
ATTORNEYS FOR EOG RESOURCES, INC.

CERTIFICATE OF SERVICE

I certify that on June 1, 2007, I served a copy of the foregoing document to the following by

- U.S. Mail, postage prepaid
- Hand Delivery
- Fax
- Electronic Service by LexisNexis File & Serve

Tom Kellahin, Esq.
117 North Guadalupe
Post Office Box 2265
Santa Fe, NM 87504-2265
(505) 982-2047 facsimile



Ocean Munds-Dry

Tom Kellahin

From: Tom Kellahin [tkellahin@comcast.net]
Sent: Monday, July 23, 2007 8:45 AM
To: Ezeanyim, Richard; David Brooks
Cc: Alan Alexander (Alan.E.Alexander@conocophillips.com)
Subject: NMOCDC Case 13933
Attachments: Copy of EPNG COM A #1 INJ well tabulation.xls; cement calcs.xls

| Tracking: | Recipient | Read |
|-----------|--|--------------------------|
| | Ezeanyim, Richard | |
| | David Brooks | |
| | Alan Alexander (Alan.E.Alexander@conocophillips.com) | Read: 7/23/2007 10:53 AM |
| | Brooks, David K., EMNRD | Read: 8/6/2007 9:26 AM |

Richard,

At the hearing on Burlington's CO2 Sequestration case 13933 presented to you and Mr. Brooks on June 21, 2007, I agreed to provide you with a revised tabulation of the area of review and the calculation for cement tops. Please find that information attached.

Tom Kellahin
Kellahin & Kellahin
Attorneys at Law
706 Gonzales Road
Santa Fe, NM 87501
ph 505-982-4285
fx 505-982-2047
tkellahin@comcast.net

From: Alexander, Alan E [mailto:Alan.E.Alexander@conocophillips.com]
Sent: Monday, July 23, 2007 8:03 AM
To: Tom Kellahin
Subject: FW: Cement Calcs

Here is the new spreadsheet for the CO2 sequestration hearing.

From: Schlabaugh, James L
Sent: Friday, July 20, 2007 7:52 AM
To: Alexander, Alan E
Subject: Cement Calcs

<<Copy of EPNG COM A #1 INJ well tabulation.xls>> <<cement calcs.xls>>

These are in R:\RAM\COAL\Sequestration Project\DOE Project\Hearing if you need them in the future.

Jim

9/18/2007

BURLINGTON RESOURCES OIL & GAS COM, LP
 C-108 ITEM VI - Well Tabulation in Review Area
 EPNG COM A INJ #1 - CO2 Sequestration Project

| Operator | Well Name | API No. | County | Sec. Twn Range | Type | Status | Spud Date | Comp Date | TD | PBTD | Com Zone | Comp Interval | Casing Program | TOC |
|-------------------|-------------------|--------------|----------|----------------|------|--------|-----------|------------|-------|-------|----------|---------------|---|--------------------------------------|
| 1 Burlington | EPNG Com A #300S | 30-045-31929 | San Juan | 32-31N-8W | Gas | act | 5/15/2004 | 7/16/2004 | 3440' | 3440' | Basin FC | 3157'-3249' | 9-5/8" 32.3# @ 222' w/207 cf 7" 20# @ 3067' w/906 cf 5-1/2" 15.5# @ 30.50-3437' ; no cmt | Circ. circ. no cement |
| 2 Burlington | EPNG Com A #2 | 30-045-10044 | San Juan | 32-31N-8W | gas | act. | 12/3/1966 | 12/21/1966 | 5620' | 5465' | MV | 4712'-5452' | 9-5/8" 25.4# @ 180' w/125 sx 7" 20 & 23# @ 4600' w/300 sx 4-1/2" 10.5# @ 5520' w/125 sx | Circ. 2880' - Temp Surv |
| 3 Burlington | EPNG Com A #2A | 30-045-20934 | San Juan | 32-31N-8W | gas | act. | 8/22/1971 | 9/24/1971 | 7872' | 6080' | MV | 5211'-5952' | 7" 20# @ 3652' w/240 sx 5-1/2" 15.5# @ 6569' w/100 sx | Circ. 2010' - Temp 3390' |
| 4 Burlington | EPNG Com I #10 | 30-045-21304 | San Juan | 32-31N-8W | gas | act. | 7/29/1973 | 8/14/1973 | 7987' | 7978' | DK | 7724'-7922' | 10-3/4" 32.75# @ 221' w/240 cf 7-5/8" 26.4# @ 3655' w/476 cf 4-1/2" 11.6# & 10.5# @ 7987' w/897 cf | Circ. 2260' - Temp 3285' - CBL |
| 5 Burlington | EPNG Com I #10 | 30-045-21304 | San Juan | 32-31N-8W | gas | act. | 7/29/1973 | 8/14/1973 | 7987' | 7680' | MV | 4157'-5658' | 10-3/4" 32.75# @ 221' w/240 cf 7-5/8" 26.4# @ 3655' w/476 cf 4-1/2" 11.6# & 10.5# @ 7987' w/897 cf | Circ. 2260' - Temp 3285' - CBL |
| 6 Burlington | EPNG Com A #300 | 30-045-26877 | San Juan | 32-31N-8W | gas | act | 4/27/1989 | 5/23/1989 | 3099' | 3099' | FC | 2885'-3097' | 9-5/8" 36# @ 434' w/437 cf 7" 20# @ 2899' w/960 cf | Circ. no cement |
| 7 ConocoPhillips | FC State Com #1 | 30-045-27479 | San Juan | 32-31N-8W | gas | act | 7/11/1990 | 4/25/1991 | 3158' | 3158' | FC | 2924'-3147' | 5-1/2" 15.5# @ 2836-3098' no cement 7" 23# @ 2820 w/400 sx | Circ. no cement |
| 8 ConocoPhillips | State Com K #7R | 30-045-24039 | San Juan | 32-31N-8W | gas | act | 10/8/1980 | 12/17/1993 | 7821' | 6440' | MV | 5032'-5452' | 5-1/2" 15.5# @ 2732'-3158' ; no cement 10-3/4" 32.75# @ 249' w/275 sx 4-1/2" 11.6 & 10.5# @ 7794 w/225 sx | Circ. 1534' - Calc unknown |
| 9 ConocoPhillips | State Com AL #36 | 30-045-20113 | San Juan | 32-31N-8W | gas | TAD | 7/18/1967 | 8/10/1967 | 7755' | 7736' | DK | 7518'-7700' | 10-3/4" 32.75# @ 332' w/240 sx 7-5/8" 26.4# @ 3456 w/930 cf 4-1/2" 10.5# @ 7753 w/800 cf | Circ. 986' - Calc 3100' - Temp |
| 10 ConocoPhillips | State Com AL #36 | 30-045-20113 | San Juan | 32-31N-8W | gas | act | 7/18/1967 | 10/12/2005 | 7755' | 5590' | MV | 4981'-5473' | 10-3/4" 32.75# @ 332' w/240 sx 7-5/8" 26.4# @ 3456 w/930 cf 4-1/2" 10.5# @ 7753 w/800 cf | Circ. 986' - Calc 3100' - Temp |
| 11 ConocoPhillips | State Com AL #36M | 30-045-32897 | San Juan | 32-31N-8W | gas | act. | 6/5/2006 | 9/1/2006 | 7949' | 7929' | DK | 7724'-7869' | 9-5/8" 32.3# @ 244' w/285 sx 7" 20# @ 3677' w/700 sx | Circ. Circ. 2890' - CBL |
| 12 ConocoPhillips | State Com AL #36M | 30-045-32897 | San Juan | 32-31N-8W | gas | act. | 6/5/2006 | 9/1/2006 | 7949' | 7929' | MV | 5182'-5710' | 4-1/2" 11.6# @ 7930' w/484 sx 7" 20# @ 3677' w/700 sx | Circ. Circ. 2890' - CBL |
| 13 ConocoPhillips | State Com K #7A | 30-045-21702 | San Juan | 32-31N-8W | gas | act. | 6/15/1975 | 7/12/1975 | 5710' | 5645' | MV | 4992'-5500' | 10-3/4" 32# @ 150' w/125 sx 7" 23# @ 3422' w/180 sx 4-1/2" 10.5# @ 2484' - 5705' w/365 sx | Circ. 1250' - temp Circ. |

NO PC IN THIS AREA

Set Plus Below Fruitland

DHC-3412

FRG/MV

Cement Top Calculations for C108 Item VI

State Com K 7R cement calculations

7" 20# casing set at 3598' with 470 sacks cement

$470 \text{ sx} * 1.32 \text{ cu-ft/sx} = 620.4 \text{ cu-ft}$

$620.4 \text{ cu-ft} / 0.1503 \text{ cu-ft per ft of annulus} = 4128 \text{ ft}$

$4128 \text{ ft} * 0.5 \text{ safety factor} = 2064 \text{ ft of cement}$

$3598 \text{ ft} - 2064 \text{ ft} = \mathbf{1534 \text{ ft at top of cement}}$

State Com AL 36 cement calculations

7 5/8" 26.4# casing set at 33456' with 930 cu-ft cement

$930 \text{ cu-ft} / 0.1882 \text{ cu-ft per ft of annulus} = 4942 \text{ ft}$

$4942 \text{ ft} * 0.5 \text{ safety factor} = 2471 \text{ ft of cement}$

$33456 \text{ ft} - 2470 \text{ ft} = \mathbf{986 \text{ ft at top of cement}}$