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NATURAL RESOURCES-OIL AND GAS LAW JASON KELLAHIN (RETIRED 1991)

RECOGNIZED SPECIALIST IN THE AREA OF

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION

W. THOMAS KELLAHIN

October 17, 1994

HAND DELIVERED

Mr. Michael E. Stogner Chief Hearing Examiner Oil Conservation Division P. O. Box 2088 Santa Fe. New Mexico 87501

Payne Well No. 2, O-35-30N-11W Re: Application of Meridian Oil Inc. for downhole commingling and an unorthodox coal-gas well location, San Juan County, New Mexico

Dear Mr. Stogner:

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On behalf of Meridian Oil Inc., please find enclosed our referenced application which we request be set for hearing on the next available Examiner's docket now scheduled for November 10, 1994.

By copy of this letter and application, sent certified mail, we are notifying all interested parties of their right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the application and that failure to appear at the hearing may preclude them from any involvement in this case at a later date.

Oil Conservation Division October 17, 1994 Page Two

Pursuant to the Division's Memorandum 2-90, all parties are hereby informed that if they appear in this case, then they are requested to file a Pre-Hearing Statement with the Division not later than 4:00 PM on Friday, November 4, 1994, with a copy delivered to the undersigned.

Also enclosed is our proposed advertisement of this case for the NMOCD docket.

Very truly yours,

W. Thomas Kellahin

WTK/wtk Enclosure

cc:___ Meridian Oil Inc. and

By Certified Mail - Return Receipt

All Interested Parties

PROPOSED ADVERTISEMENT

Case : Application of Meridian Oil Inc. for downhole commingling and an unorthodox coal-gas well location, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks approval to downhole commingle Aztec-Pictured Cliffs Gas Pool (SE/4 dedication) with the Basin-Fruitland Coal Gas Pool production (S/2 dedication) within the wellbore of its Payne Well No. 2 located 1180 feet from the South line and 1750 feet from the East line (Unit O) of Section 35, T30N, R11W, NMPM, at an unorthodox "off-pattern" coal-gas well location. Said well is located approximately 4 miles southeast of Aztec, New Mexico.

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:

APPLICATION OF MERIDIAN OIL INC. FOR DOWNHOLE COMMINGLING AND AN UNORTHODOX COAL-GAS WELL LOCATION, SAN JUAN COUNTY, NEW MEXICO. CASE:

APPLICATION

Comes now MERIDIAN OIL INC., ("Meridian") by and through its attorneys, Kellahin and Kellahin, and applies to the New Mexico Oil Conservation Division for approval to downhole commingle Aztec-Pictured Cliffs Gas Pool (SE/4 dedication) with the Basin-Fruitland Coal Gas Pool production (S/2 dedication) within the wellbore of its Payne Well No. 2 located 1180 feet from the South line and 1750 feet from the East line (Unit O) of Section 35, T30N, R11W, NMPM and for an unorthodox coal gas "off-pattern" well location.

In support of its application. Meridian states:

- (1) Meridian is the operator of the Payne Well No. 2 in Section 35, T30N, R11W, NMPM, San Juan County, New Mexico which currently is a single completion well in the Aztec-Pictured Cliffs Gas Pool. See Exhibit "A" attached.
- (2) The well is to be recompleted so that production from the Basin-Fruitland Coal Gas Pool and the Pictured Cliffs formation can be downhole commingled in the wellbore.

- (3) In addition, Meridian has selected to recomplete its Payne Well No. 2 at an unorthodox "off pattern" coal gas well location in order to downhole commingle that production with the Pictured Cliffs production in order to recover marginal Pictured Cliffs gas reserves located in the SE/4 of Section 35.
- (4) The ownership is not common for the well and its respective spacing and proration units in both pools.
- (5) In accordance with Division Rule 303-C-l.(b), the Applicant states and will demonstrate at hearing:
- 1. the downhole commingling in this wellbore is necessary because evidence indicates that the Pictured Cliffs formation in this area of the San Juan Basin should be marginally productive and that due to the marginal production expected, it is uneconomic to drill a stand alone Pictured Cliffs Well. In addition, it is not economic to attempt to dually complete those formations in this well;
- 2. there will be no crossflow between the two zones commingled;
- 3. neither commingled zones exposes the other to damage by produced liquids;
 - 4. the fluids from each zone are compatible with the other;
- 5. it is expected that the bottom hole pressure of the lower pressure zone is not less than 50 percent of the bottom hole pressure of the higher pressure zone adjusted to a common datum.
- 6. the value of the commingled production will not be less than the sum of the values of the individual production.

- (6) The proposed downhole commingling is necessary in order for the applicant to economically recover Basin-Fruitland Coal Gas and Pictured Cliffs Gas Pool reserves underlying each respective proration unit.
- (7) Due to the nature of the Basin-Fruitland Coal Gas production, straight allocation of gas volumes from both zones is not appropriate. Meridian therefore seeks the adoption of a monthly allocation formula to be presented at the time of the hearing.
- (8) Applicant requests that this matter be docketed for hearing on the Division's Examiner docket now scheduled for November 10, 1994.
- (9) A copy of this application is being sent to all owners of production within the respective spacing unit for the well who may be affected by downhole commingling.
- (10) Copy of this application has been sent to all offsetting operators to the two spacing units for the well.

WHEREFORE Applicant requests that this matter be set for hearing on November 10, 1994 before a duly appointed Examiner of the Oil Conservation Division and that after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted

W. Thomas Kellahin

KELLAHIN and KELLAHIN

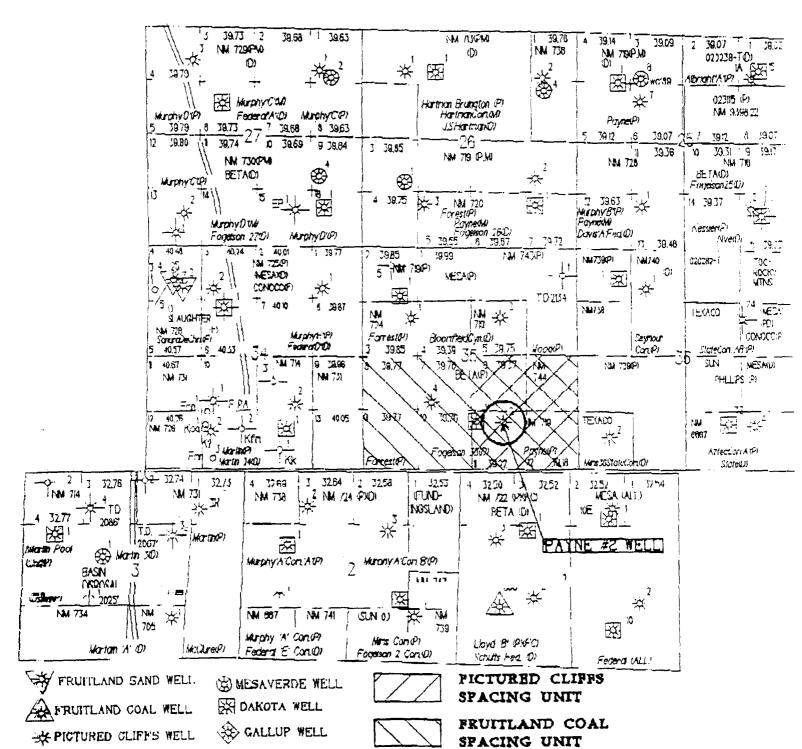
P. O. Box 2265

Santa Fe, New Mexico 87501

(505) 982-4285

Attorneys for Applicant

PAYNE #2 WELL UNIT O, SECTION 35, T30N, R11W SAN JUAN CO, NEW MEXICO



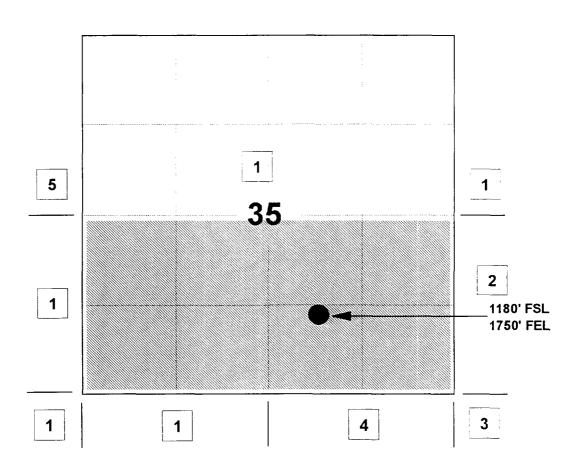
MERIDIAN OIL INC

PAYNE #2

OFFSET OPERATOR \ OWNER PLAT

Off Pattern Fruitland Coal Well Location

Township 30 North, Range 11 West



1) Meridian Oil Inc				
2) Elliott Riggs		PO Box 711, Farmington, NM 87499		
Conoco, inc.		10 Desta Drive, Suite 100W, Midland, TX 79705		
Unit Petroleum Comp	any		PO Box 702500, Tulsa, OK 74170-2500	
3) Meridian Oil Inc	&	Conoco, Inc.		
4) Meridian Oil Inc	&			
Petroleum Distributo	rs		PO Box 1157, Littleton, CO 80120	
5) Conoco, Inc	&			
Orville Slaughter		· · · · · · · · · · · · · · · · · · ·	710 E. 20th, Farmington, NM 87401	