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W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

September 19, 1996

TO:

**ALL INTERESTED PARTIES ENTITLED TO NOTICE
OF THE HEARING OF THE FOLLOWING NEW MEXICO
OIL CONSERVATION DIVISION CASE:**

*Re: Application of Burlington Resources Oil & Gas Company
for a downhole commingling reference case for its San
Juan 27-5 Unit, Pursuant to Division Rule 303.E,
San Juan County, New Mexico*

On behalf of Burlington Resources Oil & Gas Company (formerly Meridian Oil Inc.), please find enclosed our application which has been set for hearing on the New Mexico Oil Conservation Division Examiner's docket now scheduled for October 17, 1996. The hearing will be held at the Division hearing room located at 2040 S. Pacheco, Santa Fe, New Mexico.

As an interest owner who may be affected by this application, we are notifying you of your 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. Failure to appear at the hearing may preclude you from any involvement in this case at a later date.

Pursuant to the Division's Memorandum 2-90, you are further notified that if you desire to appear in this case, then you are requested to file a Pre-Hearing Statement with the Division not later than 4:00 PM on Friday, October 11, 1996, with a copy delivered to the undersigned. Please direct any questions to Alan Alexander (505) 326-9757.

Very truly yours,



W. Thomas Kellahin

cc: Burlington Resources Oil & Gas Company
Attn: Alan Alexander

KELLAHIN AND KELLAHIN

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JASON KELLAHIN (RETIRED 1991)

September 19, 1996

HAND DELIVERED

Mr. William J. LeMay, Director
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: San Juan 27-5 Unit
Application of Burlington Resources
Oil & Gas Company for the establishment
of a Downhole Commingling Reference Case
Pursuant to Division Rule 303.E
San Juan County, New Mexico

Dear Mr. LeMay:

On behalf of Burlington Resources Oil & Gas Company, please find enclosed our referenced application which we request be set for hearing on the next available Examiner's docket now scheduled for October 17, 1996.

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

Very truly yours,



W. Thomas Kellahin

cc: Burlington Resources Oil & Gas Company
Attn: Mr. Alan Alexander

PROPOSED ADVERTISEMENT

Case _____: 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 therefore, San Juan County, New Mexico. Applicant, in the above-styled cause, in accordance with Division Rule 303.E seeks to establish a downhole commingling reference case to provide for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas, and (d) modification of notification rules on an area-wide basis authorization for downhole commingling of Dakota, Mesaverde, Fruitland-Coal and Pictured Cliffs gas production in the wellbores of existing or future wells drilled anywhere within the San Juan 27-5 Unit located in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.

The center of said area is located approximately 10 miles southeast from Gobernador Camp, 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 BURLINGTON RESOURCES CASE NO. _____
OIL & GAS COMPANY FOR DOWNHOLE
COMMINGLING REFERENCE CASE FOR ITS
SAN JUAN 27-5 UNIT
PURSUANT TO DIVISION RULE 303.E
SAN JUAN COUNTY, NEW MEXICO.

A P P L I C A T I O N

Comes now BURLINGTON RESOURCES OIL & GAS COMPANY (formerly Meridian Oil Inc.), by and through its attorneys, Kellahin and Kellahin, and applies to the New Mexico Oil Conservation Division for the establishment of a downhole commingling reference case pursuant to Division Rule 303.E for its San Juan 27-5 Unit and the adoption of special administrative rules therefore, San Juan County, New Mexico. Applicant, in the above-styled cause, in accordance with Division Rule 303.E seeks to establish a downhole commingling reference case to provide for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas, and (d) modification of notification rules on an area-wide basis authorization for downhole commingling of Dakota, Mesaverde, Fruitland-Coal and Pictured Cliffs gas production in the wellbores of existing or future wells drilled anywhere within the San Juan 27-5 Unit located in Township 27 North Range 5 West, NMPM, San Juan County, New Mexico.

In support of its application, Burlington Resources Oil & Gas Company ("Burlington"). states:

(1) Burlington is the operator of the San Juan 27-5 Unit which currently includes 101 Dakota wells, 105 Mesaverde wells, 4 Fruitland-Coal wells and 87 Pictured Cliffs wells all located within an area known as the "San Juan 27-5 Unit" consisting of 23,043 acres, more or less of acreage, as identified on Exhibit "A".

(2) In the absence of the establishment of a "reference case" as provided in Rule 303.E, Division general state-wide Rule 303.C requires that administrative applications for downhole commingling of gas production be submitted, processed and approved on a well by well basis including submittal of the following:

- (a) economic criteria to support that at least one zone to be commingled is marginal.
- (b) pressure criteria to demonstrate that the bottomhole pressure of all zones to be commingled is less than the original bottom hole pressure of the lowest pressures zone,
- (c) allocation formulas,
- (d) notification by certified mail return receipt to each interest owner where ownership is not common in the zones to be commingled, and
- (e) notification by certified mail return receipt to each offset operator

(3) Sufficient data is now available from existing wells in this unit to support the Division approving the downhole commingling of Dakota, Mesaverde, Fruitland-Coal and Pictured Cliffs gas production within this unit on an "area-wide" basis rather than on a "well-by-well basis."

(4) Sufficient data is now available from existing wells in this unit to support the Division adopting a "reference case" for the downhole commingling of Dakota, Mesaverde, Fruitland-Coal and Pictured Cliffs gas production within this unit as to the following criteria:

- (a) economic criteria to support that at least one zone to be commingled is marginal;
- (b) allocation formula:
- (c) notification by certified mail-return receipt to (a) each interest owner where ownership is not common in the zones to be commingled and to (b) each offset operator who is also an interest owner in this unit; and

- (d) notification by certified mail-return receipt to each offset operator, except as provided in paragraph (d) above will continue to be made provided those offset operators are operators other than applicant.

(5) Burlington seeks authorization pursuant to Division Rule 303.E that all administrative application for downhole commingling of Mesaverde, Dakota, Fruitland-Coal and Pictured Cliffs gas production within this unit submitted subsequent to the filing of this application in this case shall be authorized to refer to the order entered in this case and will not be required to submit evidence or data for the following criteria (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas, and (d) notice to owners of any production within spacing units where the ownership is not common and offset operators who also own an interest in this unit.

(6) Production from the Dakota and Pictured Cliffs polls is now either marginal or uneconomic from existing wells within this unit and the economic life of that production is extended if it is downhole commingled with Mesaverde or Fruitland-Coal production.

(7) The approval of downhole commingling of these formations within this unit will extend the economic life of the existing wells and thereby increase ultimate recovery from these formations.

(8) In addition, any new wells to be drilled or recompleted in this unit should be approved for downhole commingling because either the Dakota or the Pictured Cliffs zones is marginal based upon criteria which the applicant will submit at the hearing of this case.

(9) It is anticipated that new wells, recompleted wells or existing wellbores in this unit will be most economically completed if there is a summary administrative procedure by which those wells may be downhole commingled.

(10) The processing of downhole commingling application for this unit in the absence of adopting a reference case will be an administrative burden to the Division and to the operator.

(11) Approval of downhole commingling reference case for this unit on an area-wide basis is in the best interest of conservation, the prevention of waste and the protection of correlative rights.

(12) Burlington requests the adoption of a summary administrative procedure with the necessary exceptions to the Division Rule 303.C so that the Supervisor of the Aztec District Office of the Division shall approve the downhole commingling of said production on an area-wide basis for this unit.

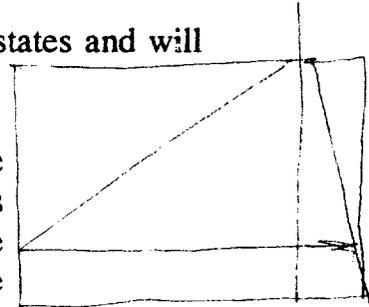
(13) The ownership is not common among these four formations within this unit.

(14) In accordance with Division Rule 303.C(1)(b), the Applicant states and will demonstrate at hearing:

1. That the wells in this unit which are currently single completions in the Dakota formation or the Pictured Cliffs formation are now marginal and production cannot be economically continued nor further developed unless it is done so by downhole commingling that production.

2. That there will be no unrecovered production crossflowing between or among the zones commingled.

3. That the value of the commingled production will not be less than the sum of the values of the individual production.



(15) In order to salvage the remaining Dakota and Pictured Cliffs production from this unit, Burlington seeks approval to downhole commingle all Dakota, Mesaverde, Fruitland-Coal and Pictured Cliffs production from any existing wells where mechanically feasible and the adoption of a summary procedures for the downhole commingling of future wells to be drilled in the Unit.

(16) Burlington will submit at hearing proposed formulas for the allocation of production to each of the commingled zones and a description of the factors or data used in determining such formulas.

(17) Applicant requests that this matter be docketed for hearing on the Division's Examiner docket now scheduled for October 17, 1996.

(18) Notice of this application has been sent to all interest owners entitled to receive production within the unit.

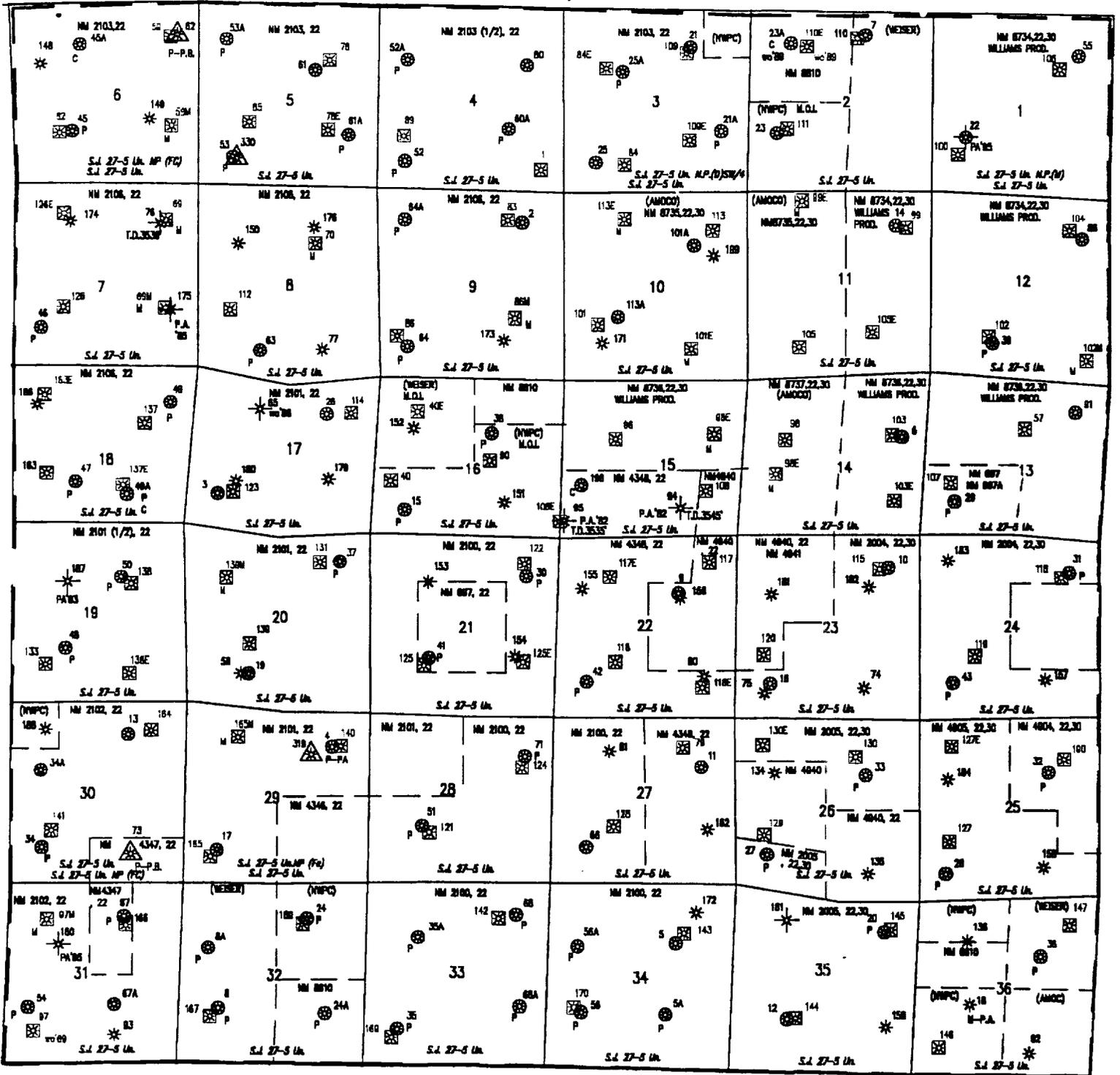
WHEREFORE Applicant requests that this matter be set for hearing on October 17, 1996 before a duly appointed Examiner of the Oil Conservation Division and that after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', with a long horizontal flourish extending to the right.

W. Thomas Kellahin
KELLAHIN and KELLAHIN
P. O. Box 2265
Santa Fe, New Mexico 87501
(505) 982-4285
Attorneys for Applicant

San Juan 27-5 Unit Rio Arriba Co., New Mexico T27N,R5W



San Juan 27-5 Unit
GWI/NWI/RI/ORRI Owners

Revenue owner lists

ALICE JANE WEBB
ALICE M VICENTI
AMALIA S SANCHEZ
AMOCO PRODUCTION COMPANY
BEDROCK LIMITED PARTNERSHIP
BURLINGTON RESOURCES O&G CO
CINCO GENERAL PARTNERSHIP
COASTAL OIL & GAS CORP
CORINNE MILLER GAY TRUST
CRUEZELIA C MONTOYA
CRUZELIA & PAT D MONTOYA HWJT
DEREK PETER VENEZIA
DIOCESE OF GALLUP
DONALD & FLORENCE M CANDELARIA
DONALD R CANDELARIA
E J E BROWN COMPANY
EDNA E MORRELL LIVG TRUST
ELEANOR G HAND
ELIZABETH T CALLOWAY
ERNESTINA M GALLEGOS
FRANCIS LEROY CANDELARIA
FRANK D GORHAM JR
FREDDY ARNOLD
FREDERICK EUGENE TURNER
FRIEDA M HOLT
GENEVIEVE CANDELARIA
GERALD F HARRINGTON
HARCO LTD PTSHP
HAROLD O POOL IRRV RESIDUAL TR
HORACE & ELMYRA MCKAY TRUST
IRIS ANN DAHARSH
J FIDEL & CORDELIA CANDELARIA
J FIDEL CANDELARIA
J GLENN TURNER JR
JAMES M RAYMOND
JAMES R PAYNE & JEAN PAYNE
JAMES V HARRINGTON
JO ANN SCHMIDT
JOHN C MEADOWS
JOHN CHRISTOPHER CANDELARIA
JOHN LEE TURNER
JOSEPH R ABRAHAM
JUAN R MONTANO
KATHLEEN QUINN
KATHRYN L CAMPBELL

KERR-MCGEE CORPORATION
LANGDON C HARRISON
LANGDON D HARRISON
M A R OIL & GAS CORP INC
MANUEL A SANCHEZ TRUST
MARIE PEEK
MARY JO WELLS
MARY JONE CHAPPELL
MAYDELL MILLER MAST TPTRUST
MERCEDES M SKIDMORE
MINERALS MANAGEMENT SERVICE
NICK G CANDELARIA
PABLO LENNY CANDELARIA
PATRICIA ANN ASHBURN
PAUL MICHAEL CANDELARIA
PAULETTE SHARON CANDELARIA
RAYMOND MARTINEZ ESTATE
RICHARD ARNOLD
ROBERT L BAYLESS
ROBERT P & ANNA D EARNEST TR
ROBERT P TINNIN
ROMERO FAMILY LTD PARTNERSHIP
RUFIE LUJAN
RUTH ZIMMERMAN TRUSTEE
SAMUEL L & FRANCES DAZZO
SCOTT ANTHONY VENEZIA
STANLEY R ARNOLD
STATE OF NEW MEXICO
STEPHANIE A & CARLOS MARTINEZ
T H MCELVAIN OIL & GAS LTD PAR
TEMPE LTD PARTNERSHIP
THE WISER OIL COMPANY
THELMA POOL REV MARITAL TRUST
THOMAS A DUGAN & MARY E DUGAN
TOTAL MINATOME CORPORATION
UW FOSTER MORRELL DECD
UNION OIL CO OF CALIF
VASTAR RESOURCES INC
VERDA L BOCCACIO
VIRGINIA M MARTINEZ
W G PEAVY OIL COMPANY
WILLIAM G WEBB
WILLIAMS PRODUCTION COMPANY

BRAND (50%)
AMOCO (50%)
MONTANO (50%)

(Formerly ARCO)