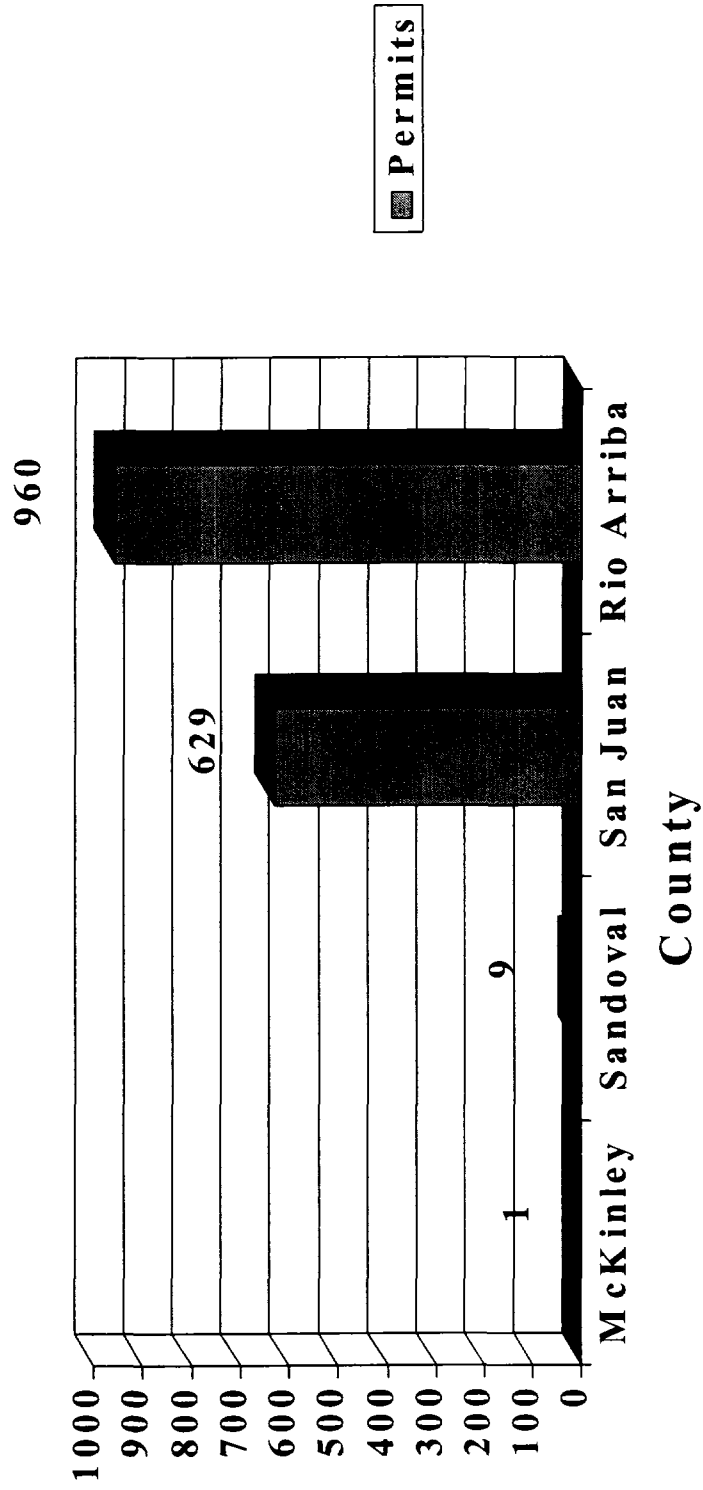


**DOWNHOLE COMMINGLING  
PERMIT SUMMARY**

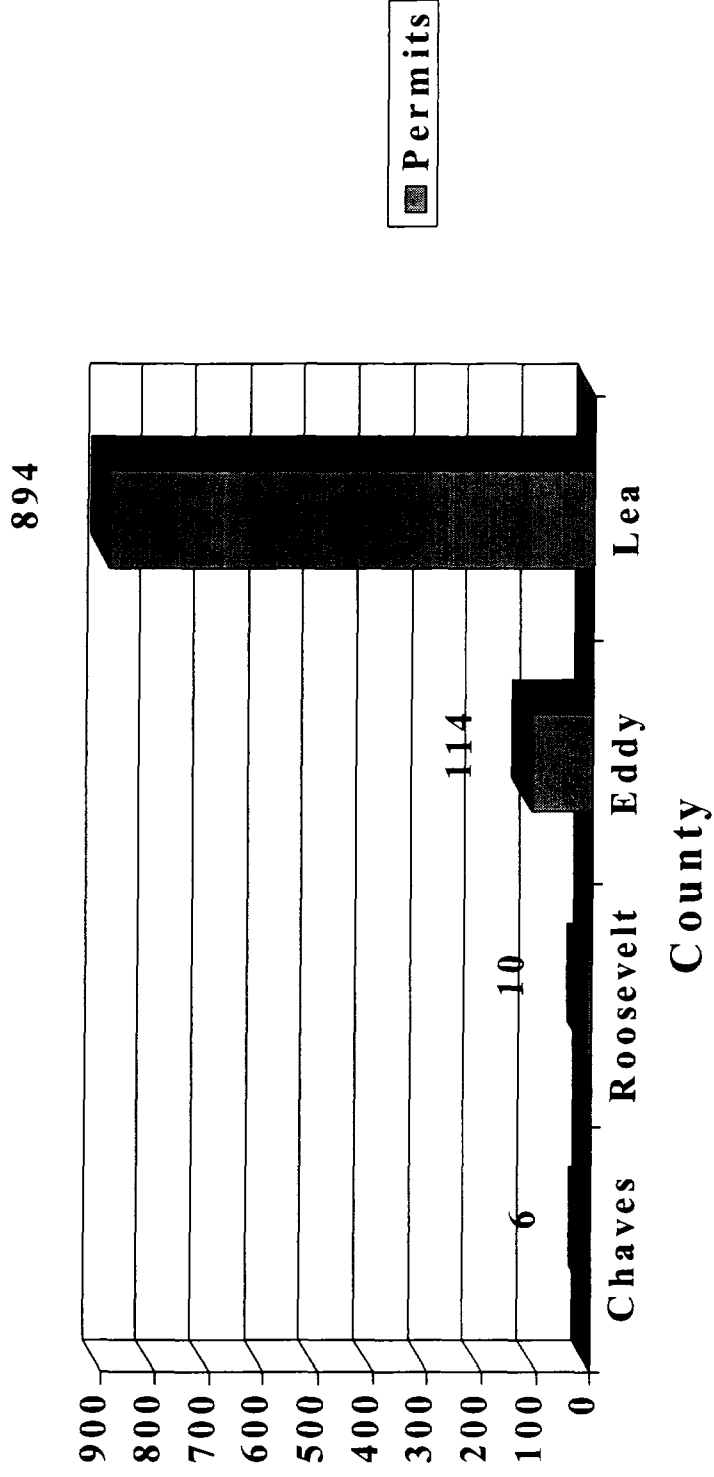
	Chaves	Roosevelt	Eddy	Lea	McKinley	Sandoval	San Juan	Rio Arriba	TOTAL
<b>Administrative DHC Permits</b>	6	10	114	894	1	9	629	960	2,623
<b>Hearing DHC Permits</b>	0	1	38	74	1	1	83	99	297
<b>TOTAL</b>	6	11	152	968	2	10	712	1059	2,920

(Note: Administrative DHC permits are generally single well permits, while DHC hearing permits may approve on or more wells for downhole commingling.)

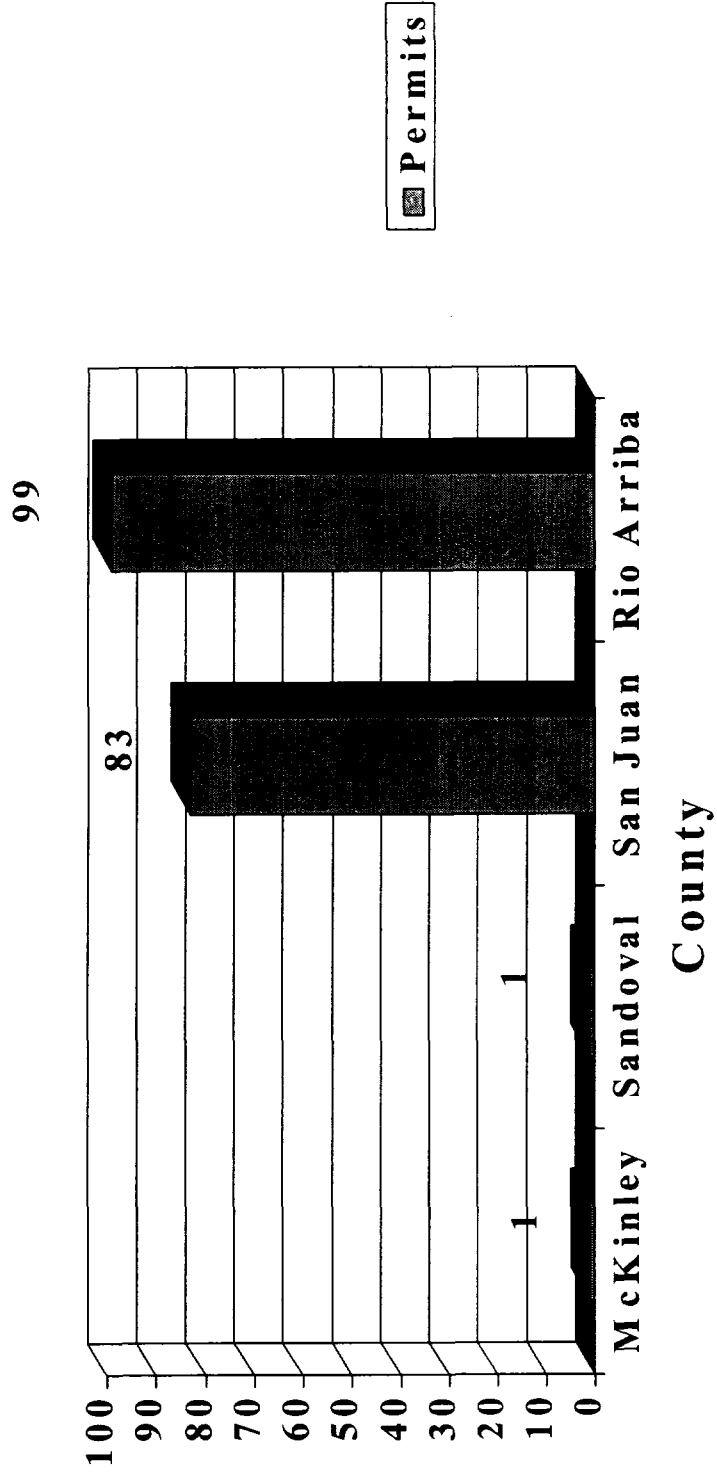
# Administrative Downhole Commingling Permits San Juan Basin, NW New Mexico



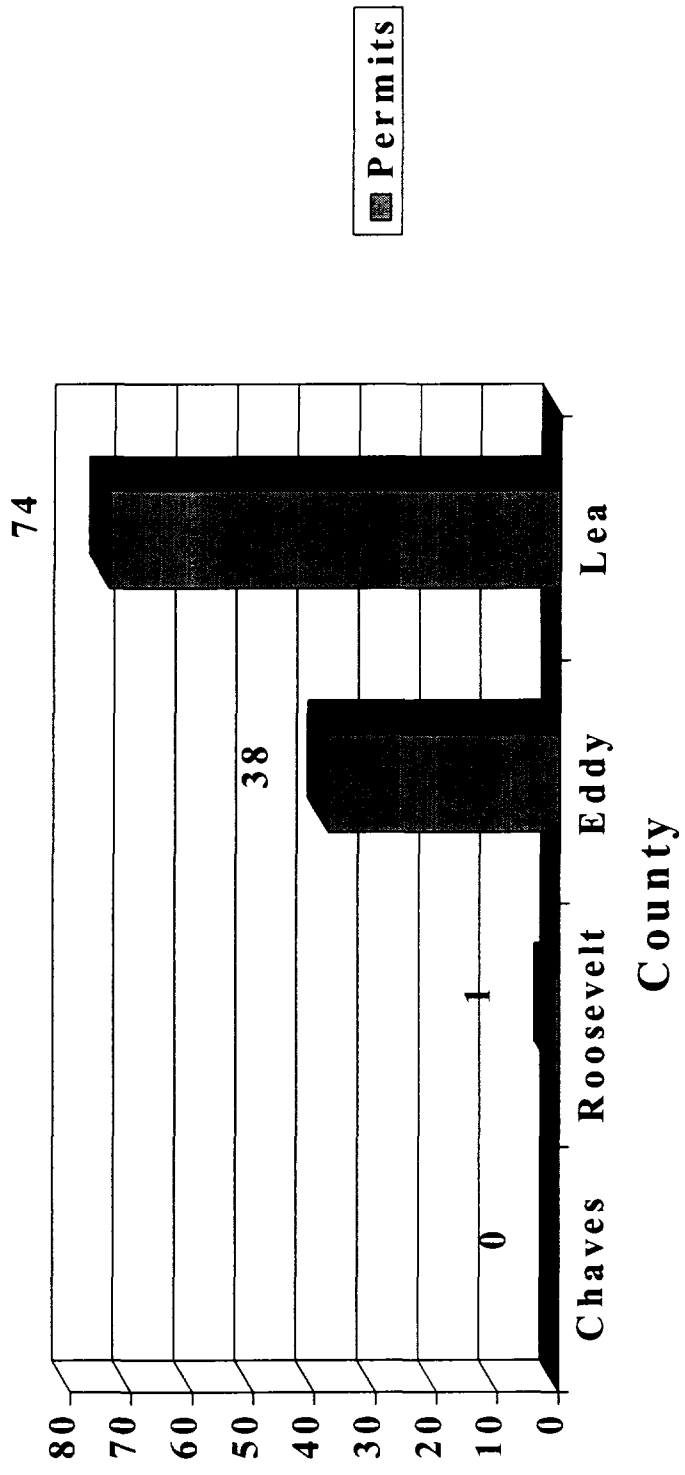
# Administrative Downhole Commingling Permits Permian Basin, SE New Mexico



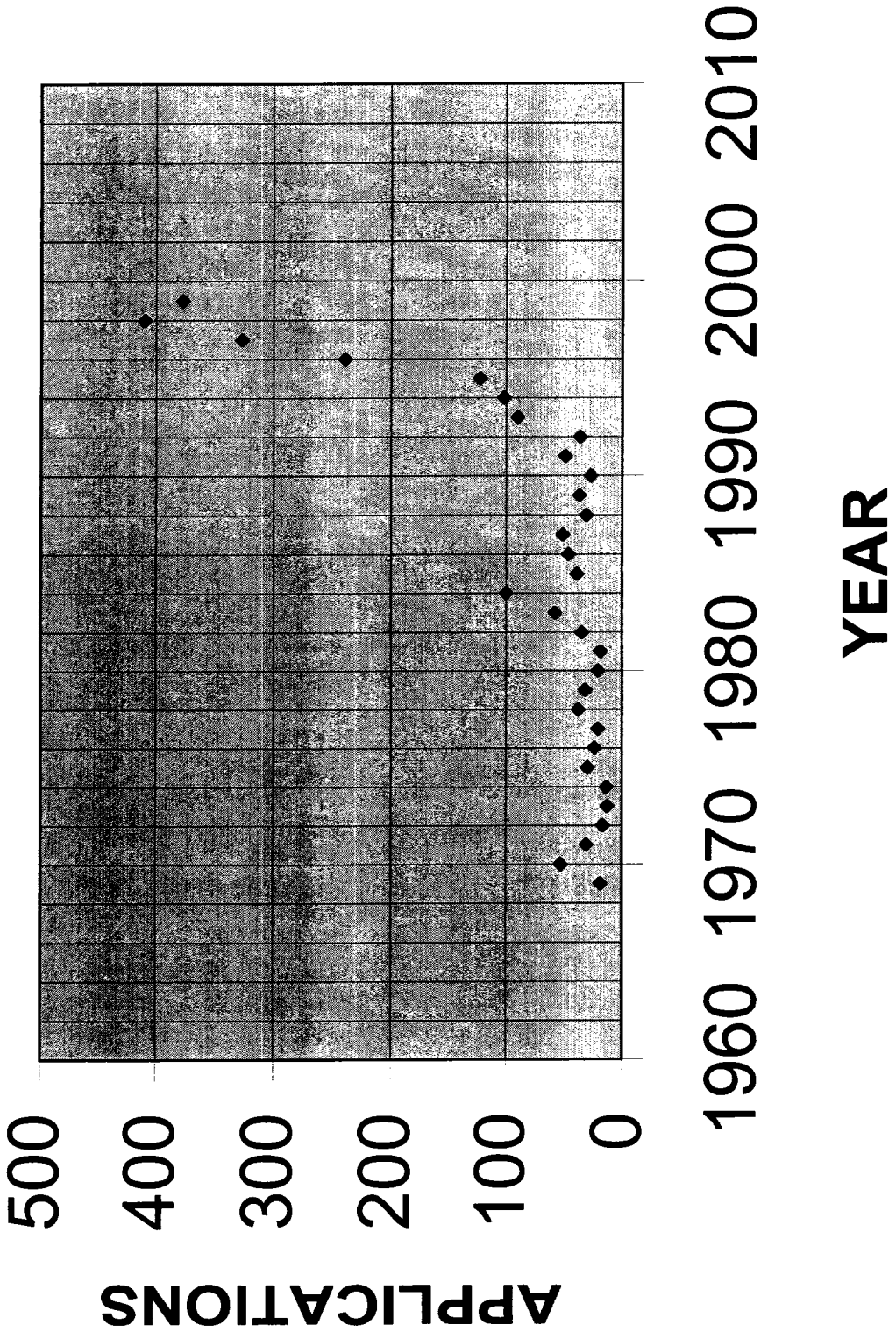
**Downhole Commingling Permits-Hearing Process  
San Juan Basin, NW New Mexico**



# Downhole Commingling Permits-Hearing Process Permian Basin, SE New Mexico



# ADMINISTRATIVE WORKLOAD



## Current Approval Process for Downhole Commingling

- \* Each application for downhole commingling must be filed on Division Form C-107-A. In order to qualify for administrative approval, the well must meet all the criteria for approval contained within Rule 303.C.(1)(a) and 303.C.(1)(b).
- \* OCD Engineering Bureau personnel review the application for completeness and compliance with the criteria described above. Downhole commingling permits are generally issued within 20-25 days after receipt of the application. Each application has a unique permit number (i.e. DHC-2600). All downhole commingling permits are currently issued by the Santa Fe Office of the Division.
- \* If the interest ownership between the zones being commingled is different, the applicant, except in the case of a “Reference Case” exception, must notify all interest owners of the application. Form C-107-A is held for twenty days in order to provide interest owners the opportunity to object. If an objection to an application is received, or if the application does not meet the criteria for administrative approval, the application is set for hearing before a Division examiner.
- \* A Form C-107-A may be approved after notice and hearing when it is determined that such approval will not result in waste or violation of correlative rights. A hearing order, approving the application, is issued soon after the case is heard. Each case is issued a unique hearing order number (i.e. R-10000).
- \* “Reference Cases”: If an operator has extensive data within a pool or geographic area which is repeatedly submitted as supporting data on Form C-107-A (i.e. pressure data), the applicant may request an exception to provide this data on subsequently filed Form C-107-A’s. Reference cases are generally heard by a Division examiner. Hearing orders are issued in these “Reference Cases” soon after the hearing. (See Example).

**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. 11627  
ORDER NO. R-10695**

**APPLICATION OF BURLINGTON RESOURCES  
OIL & GAS COMPANY FOR THE ESTABLISHMENT  
OF A DOWNHOLE COMMINGLING "REFERENCE  
CASE" FOR ITS SAN JUAN 28-5 UNIT PURSUANT  
TO DIVISION RULE 303.E. AND THE ADOPTION  
OF SPECIAL ADMINISTRATIVE RULES THEREFOR,  
SAN JUAN COUNTY, NEW MEXICO.**

**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. Catanach 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) Due 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 28-5 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 commingle (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 28-5 Unit which encompasses some 17,399 acres in Township 28 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 28-5 Unit, the applicant currently operates sixty-seven (67) Basin-Dakota Gas Pool wells, seventy-one (71) Blanco-Mesaverde Gas Pool wells, sixteen (16) Gobernador-Pictured Cliffs, Oso-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and nineteen (19) 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 28-5 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 28-5 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 28-5 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 28-5 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 28-5 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 1,258 MMCFG and 77 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 276 MCFGD and 136 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 28-5 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 28-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- a) the average shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations at the time of initial development were approximately 3,149 psi and 1,143 psi, respectively; and,
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1,059 psi and 714 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 28-5 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 28-5 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-Fruitland 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 28-5 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 28-5 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 28-5 Unit every time a Form C-107-A is submitted to the Division. There are a considerable number of such interest owners within the unit;

- c) providing notice to each interest owner within the San Juan 28-5 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 28-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-5 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 28-5 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 28-5 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 Pictured Cliffs gas production within existing or future drilled wells within the San Juan 28-5 Unit, San Juan County, New Mexico, is hereby approved.

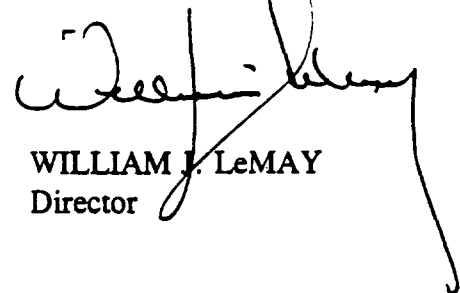
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 28-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify 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 submittal of additional supporting data.

(3) In order to obtain Division authorization to downhole commingle wells within the San Juan 28-5 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 28-5 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

S E A L

303.C. DOWNHOLE COMMINGLING

(1) The Director of the Division shall have the authority to grant an exception to Rule 303-A to permit the downhole commingling of multiple producing zones in existing or proposed wells when the following facts exist and the following conditions are met:

(a) For Wells Involving Oil Zones:

- i) The total combined daily oil or casinghead gas production from the zones before commingling does not exceed the top allowable rate for the shallowest producing horizon;
- ii) The operator utilizes a method of production which results in the efficient recovery of oil and gas reserves from the respective producing formations;
- iii) Total water production from all commingled zones does not exceed twice the oil limit as described in (i) above;
- iv) The fluids from each zone are compatible with the fluids from the other(s), and combining the fluids will not result in the formation of precipitates which might damage any of the reservoirs;
- v) The commingling will not jeopardize the efficiency of present or future secondary recovery operations in any of the zones to be commingled.

[1-1-69...3-30-96]

(b) For Wells Involving A Gas Zone:

- i) That the commingling is necessary in order to allow the recovery of gas reserves from marginal producing zones. (In determining whether a zone or zones should be classified as marginal for the purpose of this rule, the Division may consider economic factors such as drilling and operating costs, and engineering and geologic factors such as producing rates,

reserve calculations, decline rates, proration status, geologic data, etc.);

- ii) The bottomhole pressure of the highest pressured commingled zone does not exceed the original reservoir pressure of any other commingled zone in the wellbore, adjusted to a common datum. Such bottomhole pressure shall be determined by downhole measurement for each zone capable of flowing;
- iii) The commingling will not result in the permanent loss of reserves due to cross-flow in the wellbore;
- iv) That any zone which is producing from fluid-sensitive formations, which may be subject to damage from water or other produced liquids, is protected from contact from such liquids produced from other zones in the well;
- v) The fluids from each zone are compatible with the fluids from the other(s), and combining the fluids will not result in the formation of precipitates which might damage any of the reservoirs.

[1-1-69...3-30-96]

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88241-1980  
DISTRICT II  
811 South First St., Artes, NM 88210-2835  
DISTRICT III  
1000 Rio Arriba Rd, Artes, NM 87410-1493

State of New Mexico  
Energy, Minerals and Natural Resources Department  
OIL CONSERVATION DIVISION  
2040 S. Pacheco  
Santa Fe, New Mexico 87505-8429

Form C-107-A  
New 3-12-86

APPROVAL PROCESS:  
 Administrative  Hearing  
EXISTING WELLBORE  
 YES  NO

APPLICATION FOR DOWNHOLE COMMINGLING

Operator Phillips Petroleum Company Address 5525 Hwy 64, Farmington, NM 87401  
Well No. San Juan 29-6 Unit #53 Unit Ltr. - Sec. - Twp - Rge B, Sec. 31, T29N, R6W County Rio Arriba  
Lease San Juan 29-6 Unit #53 Spacing Unit Lease Types: (check 1 or more)  
OGRID NO. 017654 Property Code 009257 API NO. 30-039-07509 Federal  State  (under Fee

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	72439 S. Blanco PC		72319 Blanco Mesaverde
2. Top and Bottom of Pay Section (Perforations)	3254' - 3380'		4020' - 5514'
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) 919 psi	a.	a. 372 psi (est.)
	b. (Original) 1200 psi (est.)	b.	b. 1280 psi (est.)
6. Oil Gravity ( <sup>o</sup> API) or Gas BTU Content	1100 btu/scf		1200 btu/scf
7. Producing or Shut-in?	Producing		shut-in
Production Marginal? (yes or no)	yes		yes
* If Shut-in, give date and oil/gas/water rates of last production <small>Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data</small>	Date: Rates:	Date: Rates:	Date: 10/30/99 Rates: 163 mcf/d, 0 bwp
* If Producing, give date and oil/gas/water rates of recent test (within 60 days)	Date: 1/9/00 Rates: 250 mcf/d, 0 bwp	Date: Rates:	Date: Rates:
8. Fixed Percentage Allocation Formula - % for each zone	Oil: % Gas: %	Oil: % Gas: %	Oil: % Gas: %

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 of other required data.
10. Are all working, overriding, and royalty interests identical in all commingled zones?  Yes  No  
If not, have all working, overriding, and royalty interests been notified by certified mail?  Yes  No  
Have all offset operators been given written notice of the proposed downhole commingling?  Yes  No
11. Will cross-flow occur?  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.  Yes  No (If No, attach explanation)
12. Are all produced fluids from all commingled zones compatible with each other?  Yes  No
13. Will the value of production be decreased by commingling?  Yes  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.  Yes  No
15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). R-11187
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 all offset operators.
  - 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 Mark Stodola TITLE Reservoir Engr. DATE 1/11/00  
TYPE OR PRINT NAME Mark Stodola TELEPHONE NO. ( 505 ) 599-3455





# PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401  
5525 HWY. 64 NBU 3004

January 11, 2000

New Mexico Oil & Gas Conservation Div.  
2040 South Pacheco  
Santa Fe, New Mexico 87505-6429

Downhole Commingling Allocation Method  
on the San Juan 29-6 Unit #53

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for approximately twelve months after actual commingling occurs. After the twelve month period we will convert to the ratio method as indicated in our commingling application. We believe this will be a more accurate method of allocating production considering that the Mesaverde interval has been producing for years and that the production will not be stabilized on the Pictured Cliffs for several months.

### Pictured Cliffs Forecast

February 2000	7,278	March 2000	7,885
April 2000	7,463	May 2000	7,544
June 2000	7,241	July 2000	7,220
August 2000	7,063	September 2000	6,783
October 2000	6,766	November 2000	6,499
December 2000	6,486	January 2001	6,350

For example, if the total volume for March 2000 were 12,938 mcf, then the Pictured Cliffs would be allocated 7,885 mcf and the Mesaverde 5,053 mcf. And subsequently, the Pictured Cliffs would be allocated  $(7,885/12,938)$  or 60.94%, and Mesaverde would be allocated  $(5,053/12,938)$  or 39.06%.

Sincerely,

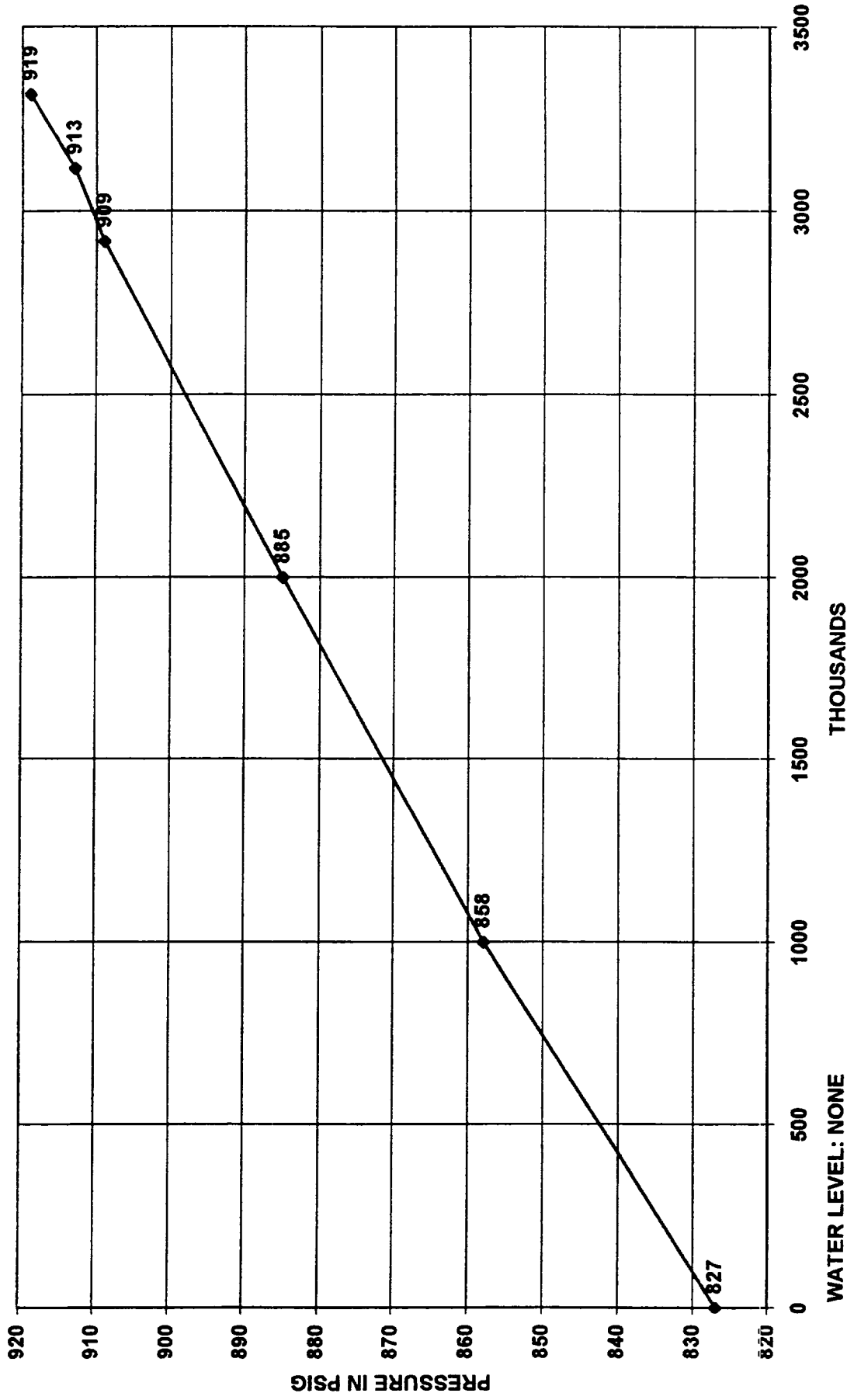
PHILLIPS PETROLEUM COMPANY

Mark W. Stodola  
Reservoir Engineer

MS/pc

cc: OCD – Aztec  
BLM- Farmington  
NM Commissioner of Public Lands – Santa Fe

PHILLIPS PETROLEUM SAN JUAN 29-6 # 53  
DATE: DECEMBER 14, 1999

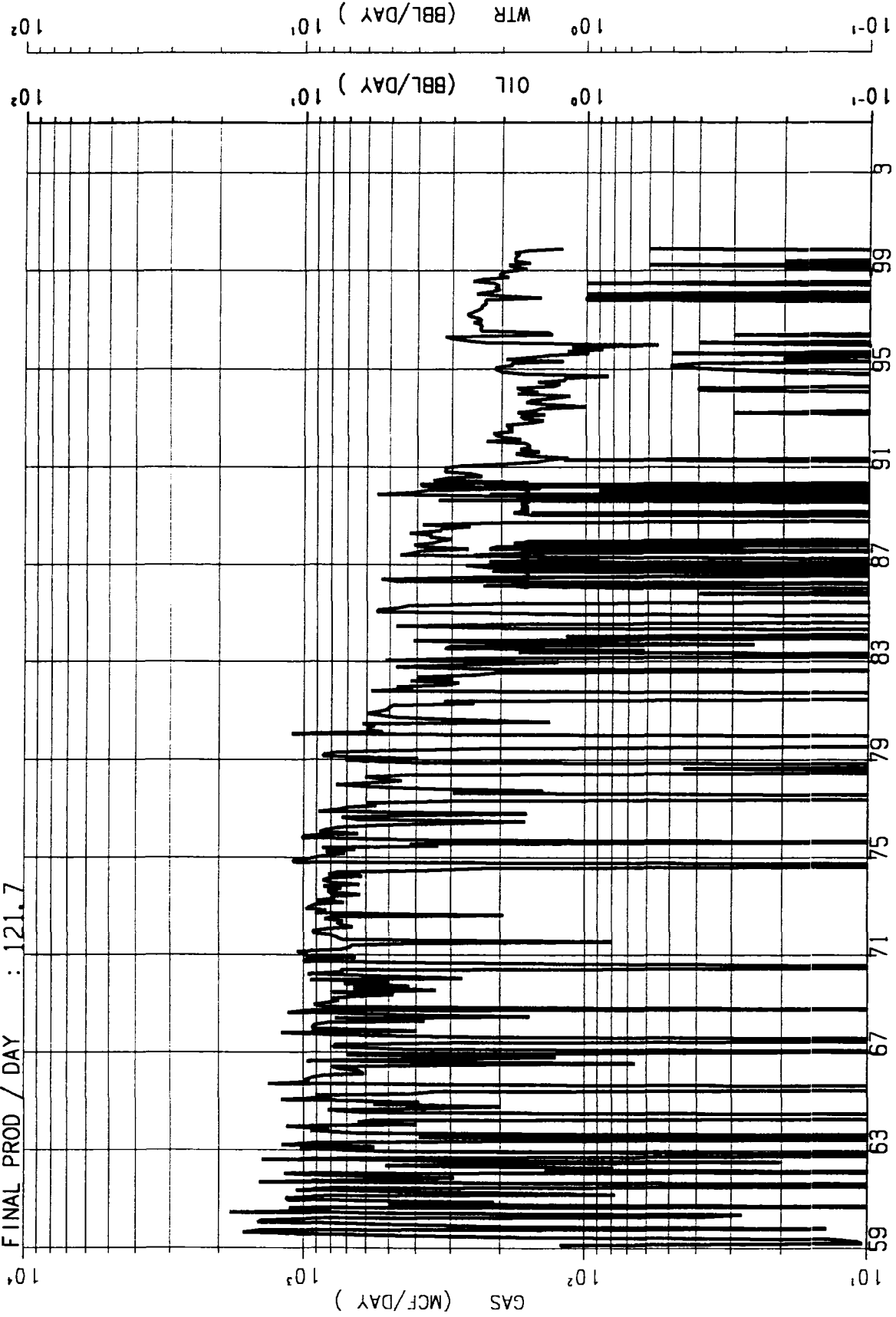


1/59-11/99

INITIAL PROD / DAY : 111.1  
REMAINING LIFE : 40.92  
CUM PRODUCTN-MUNITS : 5967.  
FINAL PROD / DAY : 121.7

50C.

Current Cums  
5967. MMCF GAS  
1075. BBL OIL  
2134. BBL WTR



LEASE- 650112 : SAN JUAN 29-6 MESA VERDE  
RESVR- 002 : BLANCO MESAVERDE  
WELL - 000053 CUM MMCF= 6166.

F028001  
ZONE-650112002000053 F028001  
API-30039075090000 THRU 99/11

### San Juan 29-6 #53 Pictured Cliffs Forecast

<i>Initial Production Rate</i>	=	275	MCFD
<i>Hyperbolic Exponent</i>	=	0.33	
<i>Decline Rate</i>	=	27.360	%

Month	Days	Cum. Days	Initial q MCFD	Final q MCFD	Average q MCFD	Cum. MCF	<i>Monthly MCF</i>
Dec-99	31	31	275	269	272	8,427	<b>8,427</b>
Jan-00	31	62	269	263	266	16,662	<b>8,235</b>
Feb-00	28	90	263	257	260	23,939	<b>7,278</b>
Mar-00	31	121	257	251	254	31,824	<b>7,885</b>
Apr-00	30	151	251	246	249	39,288	<b>7,463</b>
May-00	31	182	246	241	243	46,831	<b>7,544</b>
Jun-00	30	212	241	235	238	54,072	<b>7,241</b>
Jul-00	31	243	235	230	233	61,292	<b>7,220</b>
Aug-00	31	274	230	225	228	68,355	<b>7,063</b>
Sep-00	30	305	225	221	223	75,138	<b>6,783</b>
Oct-00	31	336	221	216	218	81,904	<b>6,766</b>
Nov-00	30	366	216	212	214	88,403	<b>6,499</b>
Dec-00	31	397	212	207	209	94,889	<b>6,486</b>
Jan-01	31	428	207	203	205	101,239	<b>6,350</b>
Feb-01	28	456	203	199	201	106,860	<b>5,622</b>
Mar-01	31	487	199	195	197	112,962	<b>6,102</b>
Apr-01	30	518	195	191	193	118,827	<b>5,865</b>
May-01	31	549	191	187	189	124,684	<b>5,857</b>



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

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

**ADMINISTRATIVE ORDER DHC-2624**

Phillips Petroleum Company  
5525 Hwy. 64  
Farmington, New Mexico 87401

Attention: Mr. Mark Stodola

*San Juan 29-6 Unit No. 53  
API No. 30-039-07509  
Unit B, Section 31, Township 29 North, Range 6 West, NMPM,  
Rio Arriba County, New Mexico.  
Blanco-Mesaverde (Prorated Gas - 72319), and  
South Blanco-Pictured Cliffs (Prorated Gas - 72439) Pools*

Dear Mr. Stodola:

Reference is made to your recent application for an exception to Rule 303.A. of the Division Rules and Regulations to permit the above described well to commingle production from the subject pools in the wellbore.

It appearing that the subject well qualifies for approval for such exception pursuant to the provisions of Rule 303.C., and that reservoir damage or waste will not result from such downhole commingling, and correlative rights will not be violated thereby, you are hereby authorized to commingle the production as described above and any Division Order which authorized the dual completion and required separation of the zones is hereby placed in abeyance.

The maximum amount of gas which may be produced daily from the well shall be determined by Division Rules and Regulations or by the gas allowable for each respective prorated pool as printed in the Division's San Juan Basin Gas Proration Schedule.

Production from the well shall be allocated as follows:

Oil and gas production from the South Blanco-Pictured Cliffs Gas Pool shall be determined by utilizing the production forecast submitted as an attachment to the downhole commingling application. Oil and gas production from the Blanco-Mesaverde Gas Pool shall be determined by subtracting South Blanco-Pictured Cliffs Gas Pool production from the well's total monthly oil and gas production.

*Administrative Order DHC-2624*  
*Phillips Petroleum Company*  
*February 7, 2000*  
*Page 2*

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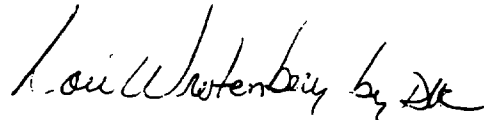
The applicant shall submit a proposed fixed allocation of production formula for the well within one year of commencing downhole commingling operations.

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

Pursuant to Rule 303.H., the commingling authority granted herein may be rescinded by the Division Director if conservation is not being best served by such commingling.

Approved at Santa Fe, New Mexico on this 7th day of February, 2000.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



LORI WROTENBERY  
Director

S E A L

LW/DRC

cc: Oil Conservation Division - Aztec  
Bureau of Land Management-Farmington