

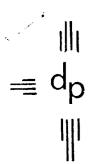
## STATE OF NEW MEXICO

## ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE

1000 RIO BRAZOS ROAD AZTEC, NEW MEXICO 87410 (505) 334-6178

OIL CONSERVATION DIVISION BOX 2088 SANTA FE, NEW MEXICO 87501	15051 334-61
DATE Gant 78, 1982	
RE: Proposed MC Proposed DHC & Proposed NSL Proposed SWD Proposed WFX Proposed PMX	
Gentlemen:	
for the Dyntrol. Con, July Julie #2	
	D-29-29N-9W
Kease and Well No.	Unit, S-T-R
and my recommendations are as follows:  Approve	
	}
Yours truly,	
3rd 7 Day	•
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## dugan production corp.

March 31, 1982

Joe D. Ramey New Mexico Oil Conservation Commission P.O. Box 2088 Santa Fe, NM 87501

Re: Application for Downhole Commingling
July Jubilee #2 Well
Basin Dakota Pool and Undesignated Gallup Pool
T-24-N, R-9-W, NMPM
Sec. 29: NW/4 NW/4
San Juan County, New Mexico

Dear Mr. Ramey:

Enclosed please find duplicate copies of the above referenced Application for Downhole Commingling which we would like to have administratively approved under Rule 303-C.

The criterion for commingling under Rule 303-C would require the well to be completed dually and each zone tested separately. However, we feel that we can forego this requirement on the basis of data collected from nearby wells. This would serve in the interest of saving the costs of a dual completion, the additional separator and meter, and the pump which would be required. Our experience in the area indicates that the production from both the Basin Dakota and the Undesignated Gallup formations in this well would be marginal. Gas chromatograph analyses of the Sixteen G's #1 Well, (Unit letter E, Sec. 7, T24N, R9W) (Undesignated Gallup formation) and the MF #1 Well, (Unit letter L, Sec. 18, T24N, R9W) (Basin Dakota formation) indicate that these flow streams will be miscible.

Also, our successful commingling of these zones in nearby wellbores shows that the liquid flowstreams are compatible and mutually non-damaging to their counterpart zones. This experience also serves to show that, in this area, there is not enough pressure disparity at the flowing conditions to create a crossflow problem. The commingling of the zones further will facilitate the production of the Undesignated Gallup zone by the device of gas lift. The mixture of the Dakota gas and Gallup effluent will be lighter than the Gallup fluids alone. This will allow production from the Gallup without the need for a pump, lower operating costs, extend the production until abandonment and prevent waste.

New Mexico Oil Conservation Commission March 31, 1982 Page Two

In this case, the price for which the production will be sold is not the same for the two zones. The Basin Dakota formation has been designated a Tight Gas Sand in this area, and the price for the Dakota gas will be twice that of the Gallup gas. By the use of an appropriate allocation formula, we can be sure that the valve of the commingled production will not be less than the sum of the valves of the individual streams.

There is a common ownership of the two zones, and the distribution of royalties is the same for both zones. For this reason, there is no danger to correlative rights which would arise from the commingling of the zones in this wellbore.

We have notified all off-set operators and/or lessees of surrounding federal leases of the proposed downhole commingling application.

We trust that all is in order for this application. If there are any questions concerning this matter, please feel free to contact either of

Sincerely,

Jerome McHugh Jr

Landman

Engineer

JM/EE:nw

Frank Chavez New Mexico Oil Conservation Commission 1000 Rio Brazos Rd.

Aztec, NM 87410

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DUGAN PRODUCTION CORP. July Jubilee #2 NW/4 NW/4 Sec 29 T24N R9W San Juan County, NM Proration Unit: N/2 Sec 29 T24N R9W APPLICATION FOR DOWNHOLE COMMINGLING

Offset Operators

## RULE 303-C (§ 2e and § 2i)

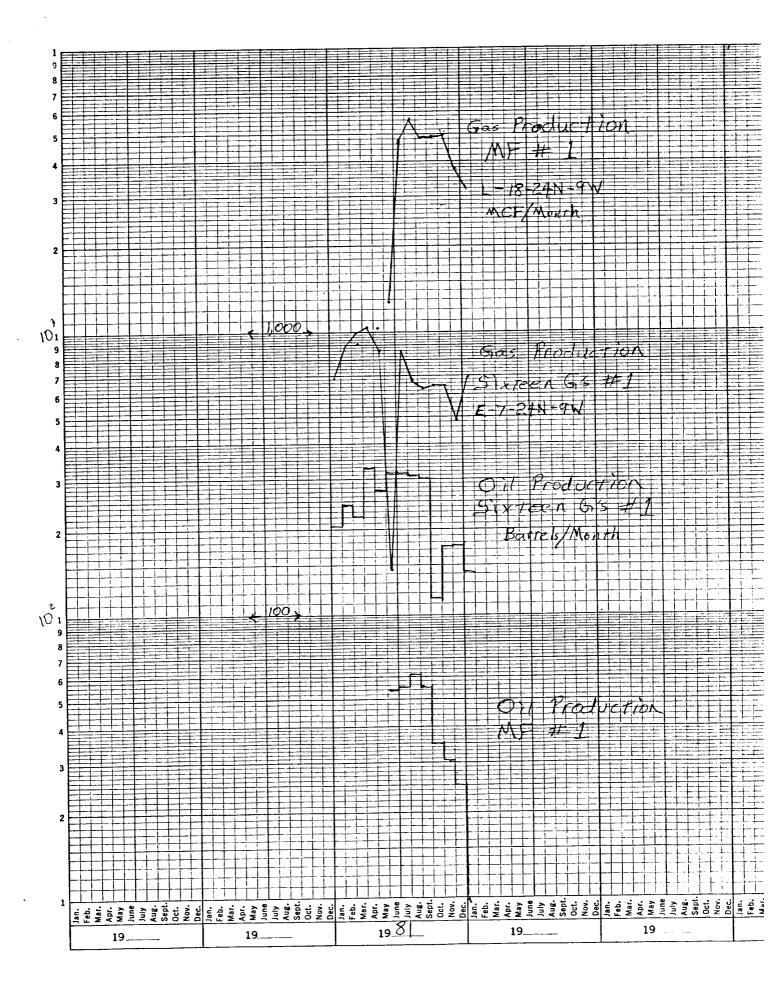
The following information shows a segment of the decline curves from the MF #1 Well, Unit letter L, Sec. 18, T24N, R9W, a Dakota producer, and the Sixteen G's #1 Well, Unit letter E, Sec. 7, T24N, R9W, an Undesignated Gallup producer. This will serve as a prognostication of future production from these zones in this area, and as an example of their relative productions, for use in arriving at an allocation formula.

For eight months, from June, 1981 until January, 1982, both the Sixteen G's and the MF #1 Wells were producing. For this period the average contribution of the Gallup well to the total production of both wells was 85.66% of the oil and 12.47% of the gas.

Two other wells in the same area are producing the commingled fluids from these zones. The July Jubilee #1 Well, Unit letter G, Sec. 30, T24N, R9W, has the gas allocated 90% to the Dakota and 10% to the Gallup, while the oil is allocated 10% to the Dakota and 90% to the Gallup. The Merry May #1 Well, Unit letter I, Sec. 24, T24N, R10W, has the gas allocated 85% to the Dakota and 15% to the Gallup. The oil from this well is allocated 15% to the Dakota and 85% to the Gallup.

Using this data as a guideline, we feel it would be appropriate to allocate the gas production from the July Jubilee #2 Well 85% to the Dakota and 15% to the Gallup. Since the oil is all valued the same, its allocation here is not critical, and the allocation of 15% of the oil to the Dakota and 85% to the Gallup should be acceptable.

APR 2 1982 OIL COM. COM. DIST. 3



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