DISTRICT I

P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II

811 South First St., Artesia, NM 88210-2835

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410-1693

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 S. Pacheco Santa Fe, New Mexico 87505-6429

APPLICATION FOR DOWNHOLE COMMINGLING

Form C-107-A New 3-12-96

APPROVAL PROCESS:

X Administrative ___Hearing

EXISTING WELLBORE

__YES __x_NO

Burlington Resources Oil & Gas		O Box 4289, Farmington, NM 8749	9
Operator San Juan 27-5 Unit		Address 35-27N-05W	Rio Arriba
Lease		Jnit Ltr Sec - Twp - Rge	County
OGRID NO14538 Property Co	ode7454 API NO30->	Spaci (XXFederalx, State,	ng Unit Lease Types: (check 1 or more) (and/or) F00
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and Pool Code	Blanco Mesaverde - 72319	a the complete such a subject of	Basin Dakota - 71599
Top and Bottom of Pay Section (Perforations)	will be supplied upon complet		will be supplied upon completion
3. Type of production (Oil or Gas)	gas	the state of the s	gas
Method of Production (Flowing or Artificial Lift)	flowing	DEGETARD	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 590 psi (see attachment)	JAN 2 6 1999	a. 898 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1346 psi (see attachment)		b. 3069 psi (see attachment)
6. Oil Gravity (API) or Gas BTU Content	BTU 1243	e. Janu	BTU 1111
7. Producing or Shut-In?	shut in	* * * * * * * * * * * * * * * * * * * *	shut in
Production Marginal? (yes or no)	no		yes
If Shut-in and oil/gas/water rates of last production	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data			
* If Producing, give data and oil/gas/water water of recent test (within 60 days)	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: %	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
 10. Are all working, overriding, and roll foot, have all working, overriding Have all offset operators been given. 11. Will cross-flow occur? _x_ production be recovered, and wing. 	oyalty interests identical in all ones, and royalty interests been nowen written notice of the propour Yes No If yes, are fluids all the allocation formula be reli	rrent or past production, or is based d providing rate projections or other recommingled zones? commingled zones? commingled zones? yes cotified by certified mail? sed downhole commingling? x_Yes compatible, will the formations not lable. yesNo (If No, attawith each other? x_YesNo	s _x_No s _x_No s _x_No sNo be damaged, will any cross-flowed ch explanation)
13. Will the value of production be de	creased by commingling?	_ Yes _X_ No (If Yes, attach explai	nation)
Land Management has been notifi	ied in writing of this application		
16. ATTACHMENTS: * C-102 for each zone to * Production curve for e * For zones with no pro * Data to support alloca * Notification list of all o	be commingled showing its seach zone for at least one year. duction history, estimated proision method or formula.	NO(S)Reference OrderR-1069 pacing unit and acreage dedication. (If not available, attach explanation.) duction rates and supporting data. Interests for uncommon interest cases. Irred to support commingling.	
I hereby certify that the informa	tion above is true and con	nplete to the best of my knowled	ge and belief.
SIGNATURE: ///	TITLE: P	roduction Engineer DATE: 1	-25-99
TYPE OR PRINT NAME: Dan	Voecks TELEPHO	ONE NO.: (505)326-9700	

District I PO Box 1980. Hoobs, NM 88241-1980

District II PO Drawer OD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Ad., Aztec, NM 87410

District IV PO Box 2088, Santa Fe, NM 87504-2088

Section

UL or lot no

State of New Mexico Energy, Minerals & Natural Resources Department

Revised February 21, 19 Instructions on b Submit to Appropriate District Off State Lease - 4 Cop Fee Lease - 3 Coc

East/West line

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

AMENDED REPO!

Form C-

County

WELL LOCATION AND ACREAGE DEDICATION PLAT Pool Name 'API Number 'Pool Code 30-039-|72319/71599 Blanco Mesaverde/Basin Dakota *Property Code Property Name Well Number SAN JUAN 27-5 UNIT 7454 144M 'OGRID No. *Operator Name *Elevation BURLINGTON RESOURCES OIL & GAS COMPANY 7264 14538 ¹⁰ Surface Location UL or lot no. Lot Idn Feet from the North/South line County East/West line Feet from the RIO 27N 5W Ι 35 SOUTH 995 **EAST** 1685 ARRIE ¹¹Bottom Hole Location If Different From Surface

WV-E/304.54 DK-S/320 NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATE OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

North/South line

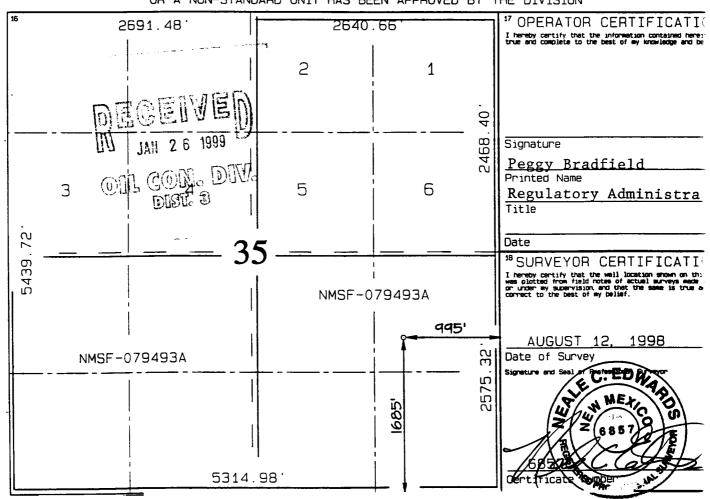
Feet from the

Feet from the

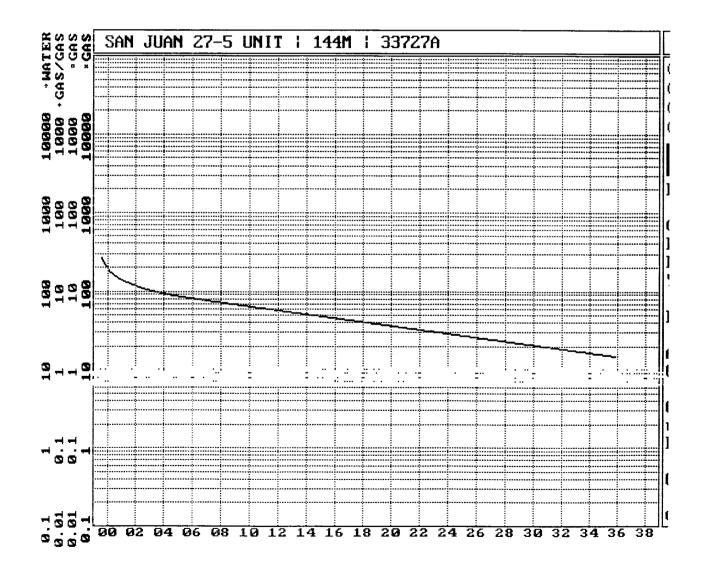
⁹⁵ Direter No.

Lot Idn

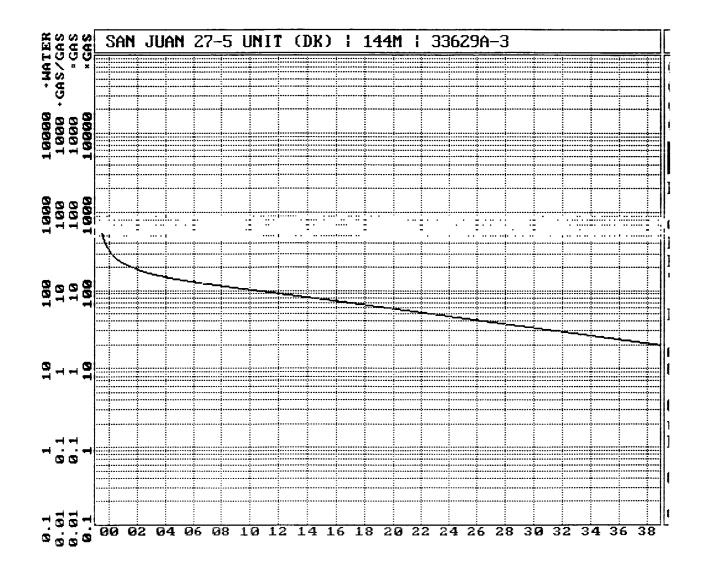
¹³ Joint or Infill | ¹⁴ Consolidation Code



San Juan 27-5 Unit #144M Expected Production Mesaverde Formation



San Juan 27-5 Unit #144M Expected Production Dakota Formation



San Juan 27-5 Unit #144M

Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method Version 1.0 3/13/94

Mesaverde	Dakota DK-Current DK-Current GAS GRAVITY 0.649 COND. OR MISC. (C/M) C %N2 0.21 %CO2 1.08 %H2S 0 DIAMETER (IN) 1.5 DEPTH (FT) 7385 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 198 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 758 BOTTOMHOLE PRESSURE (PSIA) 898.2	
MV-Current		
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %CO2 MH2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 590.3		
MV-Original	<u>DK-Original</u>	
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %CO2 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1346.0	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA)	0.649 C 0.21 1.08 0 1.5 7385 60 198 0 2548

Page No.: 2
Print Time: Wed Jan 20 08:05:13 1999
Property ID: 30
Property Name: SAN JUAN 27-5 UNIT | 12 | 49623A-1
Table Name: C:\ARIES\CMMNGLS\TEST.DBF

		CUM_GAS Mcf	DATE
	1133.0	0	12/06/55
San Juan 27-5 Unit #14	590.0	433124	08/28/70
San Juan 21-5 Onit # 14	587.0	453994	04/08/71
Mesaverde Offset	517.0	494135	08/09/72
	472.0	602674	07/12/76
	642.0	634073	01/07/78
	642.0	647407	11/07/78
	666.0		04/18/86
	507.0		12/08/88

Page No.: 1
Print Time: Wed Jan 20 08:05:13 1999

Property ID: 29

Property Name: SAN JUAN 27-5 UNIT | 145 | 44059A-1 Table Name: C:\ARIES\CMMNGLS\TEST.DBF

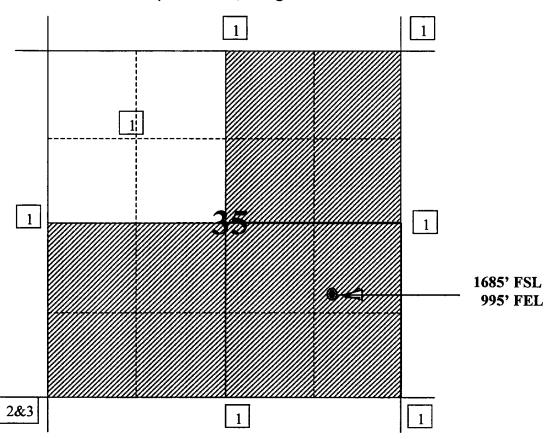
		CUM_GAS	DATE
San Juan 27-5 Unit #14 Dakota Offset	2548.0 1938.0 1140.0 1129.0 944.0 879.0 802.0 926.0 917.0 818.0	329259 403252 485562 556468 613038	05/15/72 07/07/72 08/20/73 07/15/74 09/04/75 08/08/77 05/02/79 11/02/81 09/21/83 06/05/85
	982.0 830.0 758.0	770404	10/11/88 05/29/90 07/02/92

BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 27-5 Unit #144M OFFSET OPERATOR/OWNER PLAT Down-hole Commingle

Mesaverde (E/2) / Dakota (S/2) Formations Well

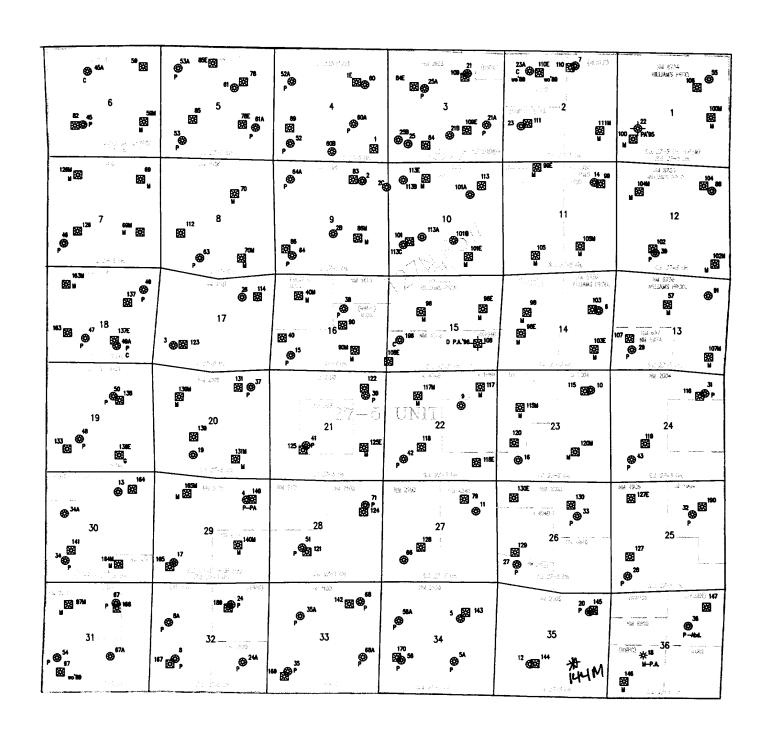
Township 27 North, Range 5 West



- 1) Burlington Resources
- 2) Amoco Production Company Attention: Steve TrefzPO Box 800Denver, Colorado 80201
- 2) Conoco, Inc.Attention: Lori Thorpe10 Dest Drive, Suite 100WMidland, Texas 79705

San Juan 27-5 Unit #144M Blanco Mesaverde / Basin Dakota

27N - 5W - 35



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. 11626 ORDER NO. R-10694

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 THEREFOR.
SAN JUAN COUNTY, NEW MEXICO.

PIO ARRIBA

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 downnoise comminging "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 downnoise commingling of Dakota. Mesaverde, Fruitland Coal and Pictures Cliffs gas production within existing or future drilled wells within the San Juan 27-5 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, ere., 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 27-5 Unit which encompasses some 23,043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.
- (5) Within the San Juan 27-5 Unit, the applicant currently operates one immired and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacito-Pictured Cliffs Gas Pool wells, and four (4) 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 27-5 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 27-5 Unit:

- 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 27-5 Unit; and.
 - d) establish a "reference case" or an administrative procedure for authorizing the downhole commingting of existing or fumre drilled wells within the San Juan 27-5 Unix without additional nonce 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 27-5 Unit:
 - 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 583 MMCFG and 426 MMCFG, respectively;
 - c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 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 27-5 Unit should be properly classified as "marginai".
 - (9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 27-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- a) the average shut-in bottominole pressure within the Dakota and Pictured Cliffs formations at the time of initial development were approximately 3.141 psi and 1.118 psi, respectively; and.
- b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations are approximately 1.032 ps; and 441 psi, respectively.
- (10) There is sufficient pressure data available within the San Juan 27-5 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 commingied wells within the San Juan 27-5 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-Fruitiand Coai Gas Poot 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 ailocation methods proposed by the applicant are routinely utilized by industry and approved by the Division and therefore the proposal to except ailocation 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 27-5 Unit the applicant presented evidence and testimony which indicates that:
 - a) the interest ownership between two zones within a given weilbore in the San Juan 27-5 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 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit:

- c) providing notice to each interest owner within the San Juan 27-5
 Unit of subsequent downhole communitings is unnecessary and is
 an excessive burden on the applicant:
- d) the downhole commingling of wells within the San Juan 27-5 Unit.

 Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 27-5 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 27-5
 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.
- 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 downtole comminging approvals within the San Juan 27-5 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 downhold commingling of Dakota. Mesaverde. Fruitiand Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 27-5 Unit. San Juan County New Mexico, is hereby approved.

CASE NO. 11626 Order No. R-10694 Page -6-

- downhole communitied within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictures Cliffs and Dakota formations as "marginal", supporting data to verify the Pictures 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 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 27-5 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 27-5 Unit of such proposed commingling.
 - (4) Juristiction 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