DISTRICT I
1625 N. French Dr., Hobbs, NM 88240
DISTRICT II
811 South First St., Artesia, NM 88210
DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410
DISTRICT IV
2040 S. Pacneco, Santa Fe, NM 87505

Operator

BURLINGTON RESOURCES OIL & GAS COMPANY

TYPE OR PRINT NAME B. WAYNE FLETCHER

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 S. Pacheco Santa Fe, New Mexico 87505-6429 Form C-107-A Revised August 1999 APPROVAL PROCESS:

___ Administrative ___Hearing

EXISTING WELLBORE

__X_ YES ___ NO

APPLICATION FOR DOWNHOLE COMMINGLING

Address

PO BOX 4289, FARMINGTON, NM 87499

San Juan 28-6 Unit		-28N-06W r, - Sec - Twp - Rge	RIO ARRIBA		
Cease OGRID NO14538 Property (cing Unit Lease Types: (check 1 or more) ralX , State , (and/or) Fee		
The following facts are submitted in support of downhole commingling: 1. Pool Name and Pool Code	Upper Zone BLANCO MESAVERDE – 72319	Intermediate Zone	Lower Zone BASIN DAKOTA - 71599		
Top and Bottom of Pay Section (Perforations)	WILL BE SUPPLIED UPON COMPLETION		WILL BE SUPPLIED UPON COMPLETION		
3. Type of production (Oil or Gas)	GAS		GAS		
Method of Production (Flowing or Artificial Lift)	FLOWING	11.9 K9A 3 C (535)	FLOWING		
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing:	a. ^(Current) 714 psi (see attachment)	a. (Current)	(Current) 1127 psi (see attachment)		
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	b. ^(Oriiginal) 1285 psi (see attachment)	b. (Oriiginal)	b. ^(Oriiginal) 3235 psi (see attachment)		
6. Oil Gravity (EAPI) or Gas BTU Content	BTU 1132		BTU 1132		
7. Producing or Shut-In?	SHUT-IN		SHUT-IN		
Production Marginal? (yes or no) * If Shut-In, give date and oil/gas/ water rates of last production	NO Date: N/A Rates:	Date: N/A 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 date andoil/gas/water rates of recent test (within 60 days)	Date: N/A Rates:	Date: N/A Rates:	Date: N/A Rates:		
8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: % WILL BE SUPPLIED UPON COMPLETION	Oil: Gas: % WILL BE SUPPLIED UPON COMPLETION	Oil: Gas: % WILL BE SUPPLIED UPON COMPLETION		
 If allocation formula is based submit attachments with supp Are all working, overriding, and If not, have all working, overrid 	upon something other than cu orting data and/or explaining r d royalty interests identical in a	rrent or past production, or is b nethod and providing rate project all commingled zones?	ased upon some other method, ctions or other required data. — Yes — X No		
14 Mill group flow occur?	Vec. No. If yes are fluid	s compatible, will the formations	not be damaged, will any cross- No (If No, attach explanation)		
12. Are all produced fluids from all	commingled zones compatible	e with each other?X_ Ye	s No		
13. Will the value of production be					
14. If this well is on, or communiti United States Bureau of Land	zed with, state or federal lands Management has been notified	s, either the Commissioner of Pu I in writing of this application.	blic Lands or the X_Yes No		
15. NMOCD Reference Cases for R	ule 303(D) Exceptions:	ORDER NO(S). R-10696 atta	ched		
* Production curve fo * For zones with no p	r each zone for at least one ye production history, estimated pro- position method or formula	s spacing unit and acreage dedicar. (If not available, attach exploreduction rates and supporting coursed to support commingling.	cation. lanation.) lata.		
I hereby certify that the information	on above is true and complete	to the best of my knowledge and	d belief.		
SIGNATURE Wayne -	Hotcher TITE	E PRODUCTION ENGINEER	DATE: 11/29/99		

TELEPHONE NO. 505-326-9700

District I PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV

State of New Mexico Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

Certificate Number

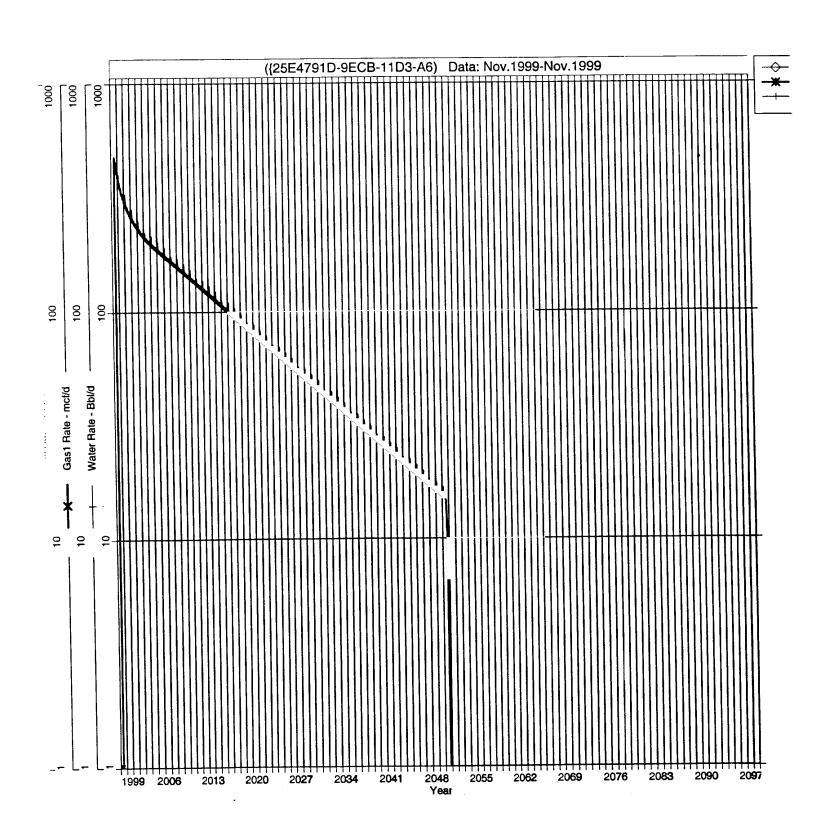
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

District III 1 000 R io Brazos Rd	l., Aztec, N	M 87410		Sa	inta Fe. I	NM 8	37504-2088				Fee i	Lease - 3 Copies
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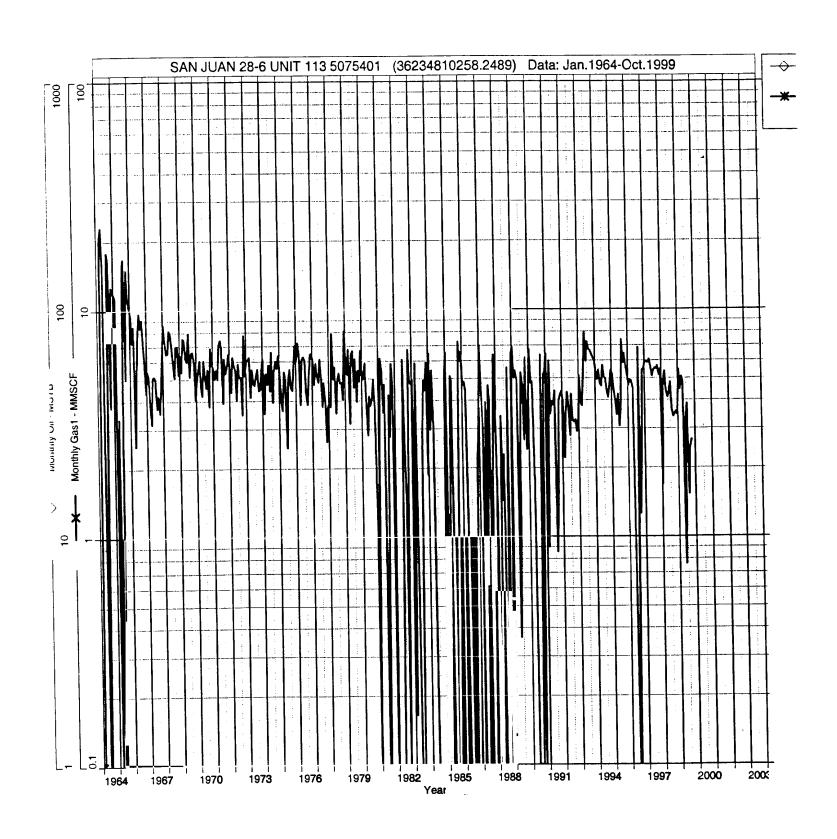
San Juan 28-6 Unit #113

Expected Production

Mesaverde Formation



San Juan 28-6 Unit #113
Actual Production
Dakota Formation



San Juan 28-6 Unit #113

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

Mesaverde	Dakota			
MV-Current	DK-Current			
GAS GRAVITY COND. OR MISC. (C/M) C %N2 %CO2 1.33 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) C 0.656 C 0.43 1.33 0 2.375 60 137 FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 620	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.41 %CO2 1.31 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1127.0			
MV-Original	DK-Original			
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.33 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1285.4	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 1.31 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 3235.3			

Page No.: 1

Print Time: Fri Nov 19 15:11:11 1999

Property ID: 1843

Property Name: SAN JUAN 28-6 UNIT | 4 | 51855A Table Name: R:\RESERVES\GDPNOS\TEST.DBF

		CUM_GAS	DATE
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			09/04/91 05/09/95

Page No.: 5

Print Time: Fri Nov 19 15:11:13 1999

Property ID: 1708

Property Name: SAN JUAN 28-6 UNIT | 113 | 50754A Table Name: R:\RESERVES\GDPNOS\TEST.DBF

DATE	CUM_GAS		
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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. 11628 ORDER NO. R-10696

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 28-6 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 28-6 Unit, San Juan County, New Mexico.
- (3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

- 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 28-6 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 28-6 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 28-6 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 449 MMCFG and 186 MMCFG, respectively;
 - the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 254 MCFGD and 216 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 28-6 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 28-6 Unit, the applicant presented engineering evidence and testimony which indicates that:

- c) providing notice to each interest owner within the San Juan 28-6 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 28-6 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 28-6 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 28-6 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 28-6 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 28-6 Unit, San Juan County, New Mexico, is hereby approved.