BURLINGTON RESOURCES

SAN JUAN DIVISION

February 10, 1997

SENT FEDERAL EXPRESS
Mr. William LeMay
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe. New Mexico 87505



ON COM. DIV.

Re:

San Juan 28-5 Unit #76

1610'FNL, 1460'FEL Section 21, T-28-N, R-5-W, Rio Arriba County, NM

API #30-039-20107

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota in the subject well. This is well was originally drilled as a Dakota; it is intended to add the Mesa Verde and commingle.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas is submitting the following for your approval of this commingling:

- 1. Form C107A Application for Downhole Commingling;
- 2. C-102 plat for each zone showing its spacing unit and acreage dedication;
- 3. Production curve for the Dakota for at least one year;
- 4. Notification list of offset operators Burlington is the offset operator;
- 5. Shut in wellhead pressure and calculated down hole pressure;
- 6. Nine-section plats for the Dakota and Mesa Verde

Notification of Mesa Verde and Dakota interest owners is covered under Reference Order #R-10695 issued November 12, 1996 attached.

We will consult with the Supervisor of the Aztec District Office of the New Mexico Oil Conservation Division to establish an allocation formula.

Please let me know if you require additional data.

Sincerely,

Peggy Bradfield

Regulatory/Compliance Administrator

encs.

XC:

Bureau of Land Management

<u>DISTRICT II</u>

State of New Mexico Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

APPROVAL PROCESS:

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

X Administrative ___Hearing

EXISTING WELLBORE

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

1000 Rio Brazos Rd, Aztec, NM 87410-1693

APPLICATION FOR DOWNHOLE COMMINGLING

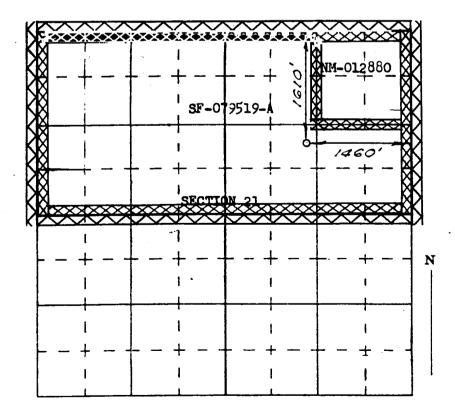
_X YES ___ NO PO Box 4289, Farmington, NM 87499

rlington Resources Oil & Ga		iress	ox 4289, Farmington, NM 87499
_{rator} :n Juan 28-5 Unit		21-28-5	Rio Arriba
RID NO14538 Property Co		•	County sacing Unit Lease Types: (check 1 or more) State, (and/or) Fee
ne following facts are submitted support of downhole omningling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and	Blanco Mesaverde - 72319		Basın Dakota - 71599
Top and Bottom of Pay Section (Perforations)	will be supplied upon completion (5392-5935'est)		7898-8048
Type of production (Oil or Gas)	gas		gas
Method of Production (Flowing or Artificial Lift)	flowing		flowing
Bottomhole Pressure	(Current) a. 1086 psi (est)	a.	a. 1135 psi
Dil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current Il Gas Zones:	(Original) b. 1225 psi (est)	b.	b. 3287 psi
stimated or Measured Original Oil Gravity (°API) or Gas BTU Content	1187		1062
'. Producing or Shut-In?	not yet completed		producing
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:
ots: For new zones with no production history, pplicant shall be required to attach production stimates and supporting data			Date: 12-29-96
If Producing, give data and pil/gas/water water of recent test within 60 days)	Date: Rates:	Date: Rates:	Rates: 1 mcfd; 0.12 bopd; 0 bwpd
B. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: % will be supplied upon completion	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
O. Are all working, overriding, and If not, have all working, overrid	d royalty interests identical in a ding, and royalty interests bee given written notice of the pro	all commingled zones? n notified by certified mail? pposed downhole commingling	based upon some other method, sulter of other required data. Yesx_NoYesx_No ?x_yesNo as not be damaged, will any cross-flowed the company of the com
Are all produced fluids from all	commingled zones compatible	e with each other?x_ Ye	es No
3. Will the value of production be 4. If this well is on, or communities	zed with, state or federal land	s, either the Commissioner of t cationXYes No	Public Lands or the United States Do
5. NMOCD Reference Cases for F	Rule 303(D) Exceptions: ORD	ER NO(S) Reference Order N	(-10095 attached
6. ATTACHMENTS: * C-102 for each zond * Production curve for * For zones with no p * Data to support allo * Notification list of a * Not additional state	e to be commingled showing it or each zone for at least one ye roduction history, estimated p cation method or formula. Ill offset operators. vorking, overriding, and royalt ements, data, or documents re	s spacing unit and acreage deter. (If not available, attach exproduction rates and supporting interests for uncommon interequired to support commingling	dication. planation.) g data. est cases. g.
hereby certify that the infor	/ 1: .		knowledge and belief. DATE02-10-97
SIGNATURE	(
TYPE OR PRINT NAME _Lori	L. Lantz T	ELEPHONE NO. (505) 326-9700

NEW MEXICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACERAGE DEDICATION PLAT

All distances must be from the outer boundaries of the Section

Operator	D4 G G				Lease			Well Nc	
			GAS COMPA	YY		28-5 UNIT	(SF-079519	-A) '	76
Unit Letter G	Section	²¹	Township	28-N	Kange 5-₩	County RIO A	RRIBA	The Assessment of the Control of the	-
Actual Footage 1610	'eet		NORTH	me and	1460	teet from the	 East	ine .	
Ground Level Ele 6722		Producing	DAKOTA		Pod! BAS	SIN DAKOTA	Ded	licete Avereage	Acres
1 Outline t	he acera	ge dedicat	ed to the subje	ect well by co	plored pencil or	hachure marks on	the plat below	·	
2. If more interest and	than one royalty)	e lease is i	dedicated to 1	the well, out!	line each and i	Jeruit, the owne	rship thereof	both as to	working
3. If more by communi	han one tization,	lease of a	different awne n force-poolii	ership is cedio og. etc?	cated to the we	ell, have the inter	euts of all cwr	ners boen cor	isolipated
Yes	N	o If	answer is "ye	es_" type cf (conscillation	Onitiontion	12000		
If answer is necessary.	"no," lis	t the own	ers and tract	descriptions v	which have acti	ually consoleafe.	Use reverse	t side of thi	s form if
No allowable	will be the rwise	assigned to) or until o	the well unti	l all interests i unit, elimino	shave been cor ating such inte	solidated by corests, has been as	ommunic zation oproved by the	unitization Commission	forced-



CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Original signed by Carl E. Matthews

Nome Folgolo	un änginger
Position St. Faces	Returns Can Company
Company June 10	, 1968
Date	

I hereby certify that the well location shown on this plat was platted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed

JANUARY 9, 1968

Registered Processional Engineer

- Registered Processional Engine - and/or Lary! Euryer r

Certificate No 1760

District i PO Bes 1980, Hobbs, NM 88241-1980 District II Pt) Drawer DD, Artesia, NM 88211-0719 1000 Min Brane Rd., Aztec, NM 87410 District IV PO Bez 2008, Santa Fe, NM 87504-2088

30-039-20107

State of New Mexico

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

Form C-102 Revised February 21, 1994 instructions on back

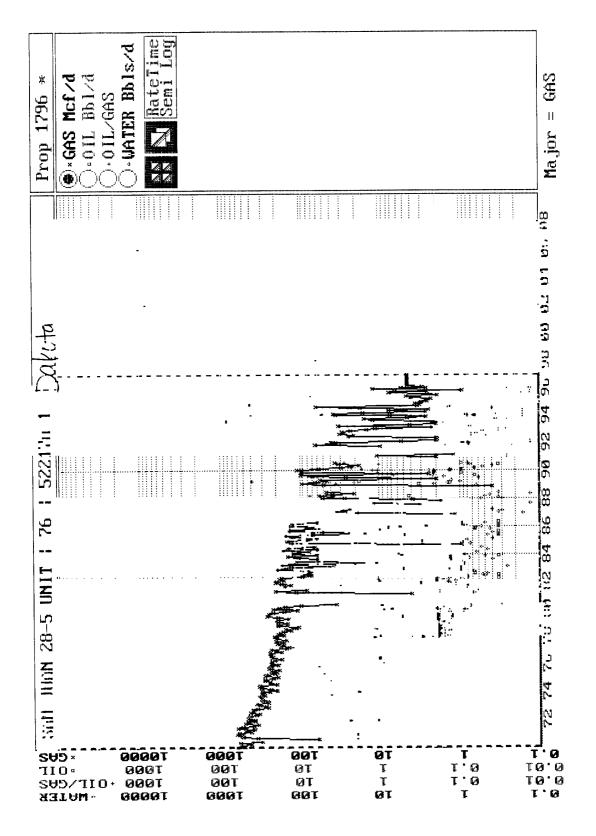
Submit to Appropriate District Office State Lease - 4 Copies

Fee Lease - 3 Copies

MENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT Pool Carie 72319 Blanco Mesa Verde · Well Number 1 Property Name 76 San Juan 28-5 Unit

· Property Code 7460° 'Elevetres 6722' * Operator Name OGRID No. BURLINGTON RESOURCES OIL & GAS COMPANY 14538 10 Surface Location Fact West line County Foot from the Nerth/South line Feet from the Range Section Township Lot Ida UL or lot me. R.A. East 1460 28-N 1610 North 5-W 21 G 11 Bottom Hole Location If Different From Surface North/South line Feet from the East West line County Feet from the Lot Ida Range UL or lot se. Section Townsip 12 Dedicates Acres 13 Joint or Infill 14 Constidetion Code | 15 Order No. NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION 17 OPERATOR CERTIFICATION 16 I hereby cerufy that the information of true and complete to the best of my in Peggy Bradfield 0 Printed Name 1460 Regulatory Admin. "SURVEYOR CERTIFICATION s from field notes of actu Not resurveyed, prepared or under my supervision, and shet the se 10/18/96 from a plat by David O. Vilvan dated 1-9-68.



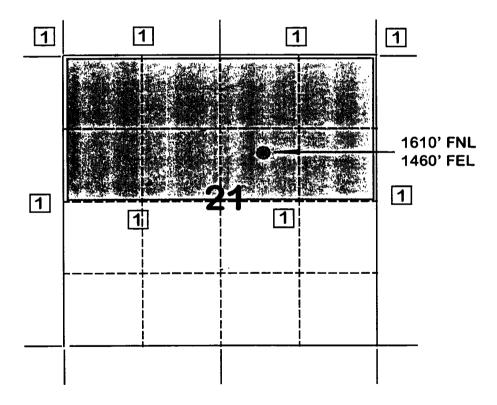
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-5 Unit #76 OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingle Well

Township 28 North, Range 5 West



1) Burlington Resources Oil and Gas Company Successor to Meridian Oil Inc.

VERSION 1.0 3/13/94

GAS GRAVITY	0.611
COND. OR MISC. (C/M)	M
%N2	0.12
%CO2	1.53
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	7973
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	190
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	2730
SOM NOCT MESSAGE	
BOTTOMHOLE PRESSURE (PSIA)	3287.4

San Juan 28-5 Unit #76 - Dakota Initial Bottomhole Pressure

VERSION 1.0 3/13/94

GAS GRAVITY	0.611
COND. OR MISC. (C/M)	М
%N2	0.12
%CO2	1.53
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	7973
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	190
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	952
BOTTOMHOLE PRESSURE (PSIA)	1134.9

San Juan 28-5 Unit #76 - Dakota Current Bottomhole Pressure

VERSION 1.0 3/13/94

GAS GRAVITY	0.684
COND. OR MISC. (C/M)	M
%N2	0.17
···-	1.04
%CO2	0
%H2S	2.5
DIAMETER (IN)	5664
DEPTH (FT)	60
SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F)	120
FLOWRATE (MCFPD)	1042
SURFACE PRESSURE (PSIA)	
BOTTOMHOLE PRESSURE (PSIA)	1225.2

San Juan 28-5 Unit #76 - Mesaverde Initial Bottomhole Pressure

VERSION 1.0 3/13/94

GAS GRAVITY	0.684
COND. OR MISC. (C/M)	M
%N2	0.17
%CO2	1.04
%H2S	0
DIAMETER (IN)	2.5
DEPTH (FT)	5664
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	120
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	927
BOTTOMHOLE PRESSURE (PSIA)	1086.1
	

San Juan 28-5 Unit #76 - Mesaverde Current Bottomhole Pressure

FDG055M4 G0		WELL	PRODUCTION	8/8'S VC	LUME	12/31/96 16:10:1				
START OF DA'DP NO: 5221 SAN JUAN 28	7A		76			(YYMMDD FORMAT) BY DATE:				
E DATE	HOURS					-WATER PROD				
L PRODUCED	ON	(BOPD	BOPM)	(MCFD	MCFM)	(BWPD	BWPM)			
12/29/96	24.0	0.12	3.48	1	29	0.00	0.00			
		0.12	3.36	1	28	0.00	0.00			
	24.0	0.12	3.24	1	27	0.00	0.00			
` ` `	24.0	0.12	3.12	1	26	0.00	0.00			
· · · · · · · · · · · · · · · · · ·	24.0	0.12	3.00	1	25	0.00	0.00			
	24.0	0.12	2.88	1	24	0.00	0.00			
	24.0	0.12	2.76	1	23	0.00	0.00			
	24.0	0.12	2.64	1	22	0.00	0.00			
_ '	24.0	0.12	2.52	1	21	0.00	0.00			
12/20/96		0.12	2.40	1	20	0.00	0.00			
	24.0	0.12	2.28	1	19	0.00	0.00			
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PF12=MAIN MENU ENTER=BACKWARDS LU #22 B MY JOB

PF11=INQ/UPDATE MENU PF24=HELP

SAN JUAN 28-5 UNIT #76 SECTION 21G, T28N, R5W RIO ARRIBA COUNTY, NM

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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. 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:
 - 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;

- 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;
 - 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;

- 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 / LeMAY

Director

S E A L

COMPLETED WELLS . FOREMAN & TYPE OF WORK

WAITING ON DELIVERY
AS OF 7 Feb 97

COMPA MILLIANME PIPE COMPA MAIL	E1 E31 31 30010	2/25/97 90810	2/25/97 87882	2/14/97 92451	2/15/97 74209	2/20/97	2/28/97 99351	2/22/97 99356	3/20/97 81984	2/25/96 95279	2/15/97 92096	2/25/97 81957	2/28/97 81900	2/25/97 81904	2/28/97 81901	3/15/97 99315	2/25/97 99322	3/25/97 99335	2/15/97 99358	2/16/97 91901145	STINATED (FLIVERY) (ATE METER #
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