DISTRICT I

DISTRICT II

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

State of New Mexico Energy, Minerals and Natural Resources Department

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

OIL CONSERVATION DIVISION

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

APPROVAL PROCESS:

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

__ YES __x_ NO

Burlington Resources Oil & G	• •		Box 4289, Farmington, NM 8749
San Juan 28-6 Unit		26-28-6	Rio Arriba
0250	Well No. U	Init Ltr Sec - Twp - Rge	County
OGRID NO14538 Property Co	ode7462 API NO3(Spacing Unit Lease Types: (check 1 or more) x
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	will be supplied upon completion	DECEMENT	will be supplied upon completion
3. Type of production (Oil or Gas)	gas	MEGRICO	gas
Method of Production (Flowing or Artificial Lift)	flowing	APR - 1 1997	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 716 psi (see attachment)	OUL GOM. D	a. 1106 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1292 psi (see attachment	**** ***** **** **** **** **** **** ****	b. 3168 psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1175		BTU 1112
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 Note: For new zones with no production history,	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	Oil: Gas: %	Oil: Gas: %	Oil: Gas:
(total of %'s to equal 100%)	will be supplied upon completion		will be supplied upon completion
O. Are all working, overriding, and If not, have all working, overriding Have all offset operators been go will cross-flow occur? production be recovered, and working the second seco	royalty interests identical in a ng, and royalty interests beer jiven written notice of the pro Yes No If yes, are fluid vill the allocation formula be r	all commingled zones? n notified by certified mail? posed downhole commingling? Is compatible, will the formati reliablex YesNo (If	is based upon some other method, sor other required data. Yesx_NoYesNoX_YesNo ons not be damaged, will any cross-f No, attach explanation)
2. Are all produced fluids from all c	•		s No
Will the value of production be d If this well is on, or communitize	, ,	· · ·	, ,
_			of Public Lands or the United States E
	le 303(D) Exceptions: ORDE	R NO(S)Reference Order f	R-10696 attached
6. ATTACHMENTS: * C-102 for each zone t * Production curve for * For zones with no pro * Data to support alloce * Notification list of all * Notification list of wo * Any additional statem	o be commingled showing its each zone for at least one yer duction history, estimated pr ation method or formula. offset operators. rking, overriding, and royalty tents, data, or documents rec	spacing unit and acreage dedi ar. (If not available, attach exp roduction rates and supporting interests for uncommon intere quired to support commingling.	cation. lanation.) data. st cases.
hereby certify that the inform		•	•
SIGNATURE 1 3 S	·		

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State of New Mexico Energy, Miserus & Natural Resources Department

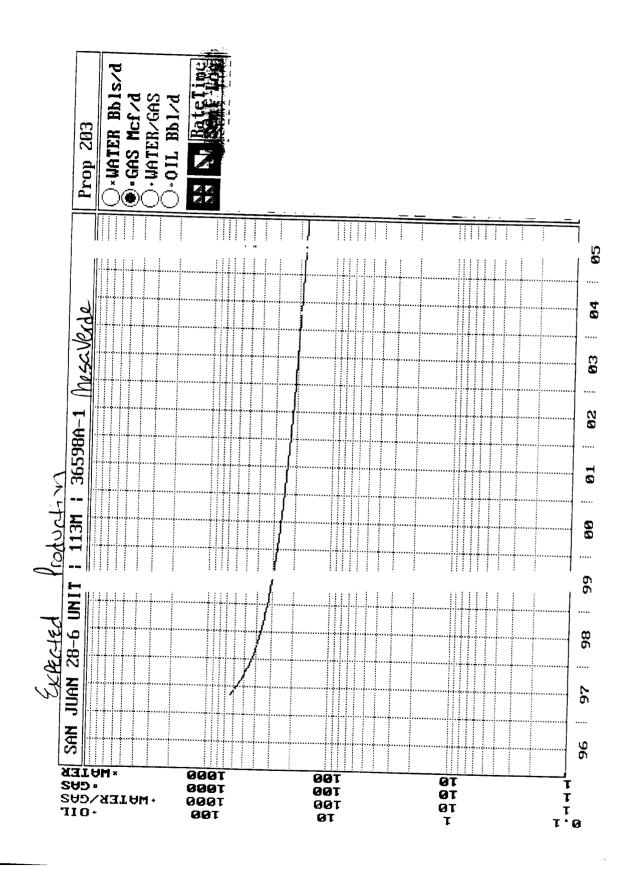
Form C-102 Revised February 21, 1994 Instructions on back

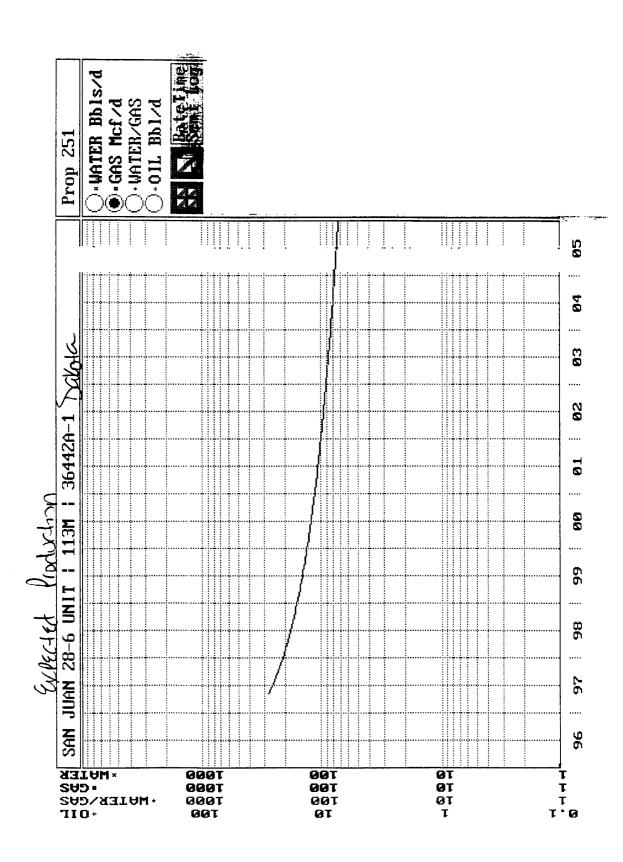
Submit to Appropriate District Office

State Lease - 4 Copies

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

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7462							28-6 Unit					113M
OGRID	No.		BURL	INGTON	RESOUR	RCES	Neme: S OIL & GAS	COMPA	NY			6575'
14538							Location					0373
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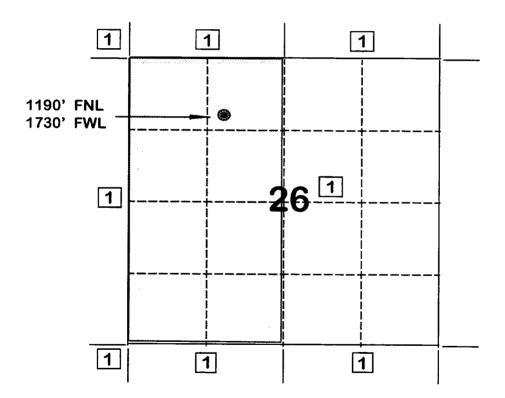


BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-6 Unit #113M OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingle Well

Township 28 North, Range 6 West



1) Burlington Resources Oil and Gas Company

GAS GRAVITY	0.686
COND. OR MISC. (C/M)	С
%N2	0.27
%CO2	0.73
%H2S	0
DIAMETER (IN)	2
DEPTH (FT)	5693
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	620
BOTTOMHOLE PRESSURE (PSIA)	716.3

GAS GRAVITY	0.686
COND. OR MISC. (C/M)	C
%N2	0.27
%CO2	0.73
%H2S	0
DIAMETER (IN)	2
DEPTH (FT)	5693
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1105
BOTTOMHOLE PRESSURE (PSIA)	1292.2

GAS GRAVITY	0.601
COND. OR MISC. (C/M)	C
%N2	0.42
%CO2	1.06
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	7616
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	940
BOTTOMHOLE PRESSURE (PSIA)	1106.1
DO LIOMHOFE LICESSONE (LOW)	1100.1

GAS GRAVITY	0.601
COND. OR MISC. (C/M)	С
%N2	0.42
%CO2	1.06
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	7616
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	2667
BOTTOMHOLE PRESSURE (PSIA)	3168.2

Page No.: 2

Print Time: Thu Mar 27 07:16:40 1997

Property ID: 10537

SJ 78-6 # 113m Property Name: SAN JUAN 28-6 UNIT | 4 | 51855A-1 Mesaverde Offset

Table Name: K:\ARIES\RR97PDP\TEST.DBF

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--DATE-- ---CUM GAS-- M SIWHP
Mcf.....Psi
                       1105.0 < Original
10/14/53
10/26/53
                       1104.0
                     0
12/30/57
               177000
                        873.0
11/06/58
               232000
                         897.0
06/14/59
               284000
                        889.0
06/14/60
               349000
                         834.0
06/13/61
               405000
                         787.0
05/29/62
               448000
                         770.0
05/16/63
               498000
                         808.0
05/26/64
               547000
                        759.0
03/08/65
                        749.0
               595000
10/21/66
               692000
                        669.0
11/17/67
               759000
                        641.0
10/10/68
               809000
                        609.0
08/18/69
               855225
                        559.0
05/25/70
               899365
                        576.0
05/04/71
               950479
                        510.0
05/22/72
              1000628
                        533.0
08/21/73
              1061228
                        435.0
07/31/74
                        505.0
              1096721
07/12/76
              1170506
                        424.0
01/07/78
              1198538
                        453.0
11/07/78
              1207460
                        453.0
10/20/86
              1277003
                        423.0
01/24/91
              1310044
                        330.0
09/04/91
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                        620.0
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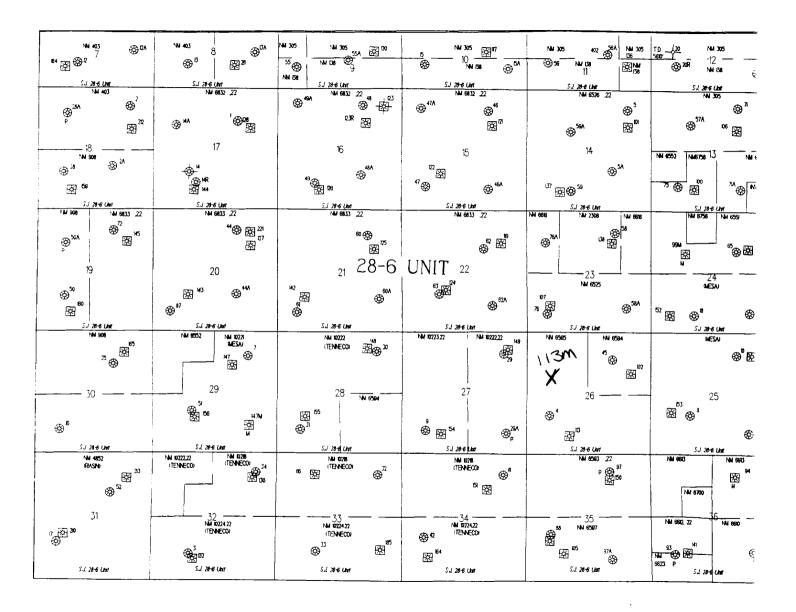
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Property ID: 1832

55 78-5= 113m 50754A-1 Dalcota Offset Property Name: SAN JUAN 28-6 UNIT | 113 |

Table Name: K:\ARIES\RR97PDP\TEST.DBF

```
--DATE-- ---CUM GAS-- M SIWHP
Mcf.....Psi
                      2667.0 Criginal
10/07/63
10/30/63
                    0
                      2666.0
10/01/64
               93000
                      1351.0
09/08/65
              178000
                      1182.0
04/12/66
              247000
                      1035.0
03/22/67
              319000
                      1250.0
04/01/68
              382000
                      1092.0
08/19/69
              494101
                        867.0
05/25/70
              542382
                        991.0
05/04/71
                      1015.0
              608545
05/22/72
              677963
                        933.0
08/21/73
              757073
                        911.0
06/24/75
              866668
                        992.0
08/08/77
             1008401
                        825.0
04/24/79
             1106719
                        890.0
09/29/81
             1226002
                        954.0
09/22/83
             1283949
                        976.0
11/07/85
             1344595
                      1004.0
01/07/86
                        920.0
             1361852
10/15/88
             1431430
                      1052.0
06/08/90
                      1002.0
             1505898
                        940.0 CUIRNY
03/29/92
             1576332
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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;
 - 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.