DISTRICT

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

DISTRICT II

DISTRICT III

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

1000 Rio Brazos Rd, Aztec, NM 87410-1693

OIL CONSERVATION DIVISION

State of New Mexico
Energy, Minerals and Natural Resources Department

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

PO Box 4289, Farmington, NM 87499 **Burlington Resources Oil & Gas Company** Operator Address Rio Arriba **SAN JUAN 28-5 UNIT** 70M D 34-28N-5W County Well No. Unit Ltr. - Sec - Twp - Rge Lease Spacing Unit Lease Types: (check 1 or more) OGRID NO. _14538 _____ Property Code __7460 _____ API NO.30-039-25655 _Federal __X___ , State _____(and/or) Fee ___

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
Top and Bottom of Pay Section (Perforations)	will be supplied upon completion		will be supplied upon completion
Type of production (Oil or Gas)	gas		gas
Method of Production (Flowing or Artificial Lift)	flowing	NEGEIVEN	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 588 psi (see attachment)	1° JUN - 3 1997	a. 731 psi (see attachment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1346 psi (see attachment)	oil con. Div	b. 3325psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1182	DIE 110 G	BTU 1132
7. Producing or Shut-In?	shut-in		shut-in
Production Marginal? (yes or no)	по		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			

District i PO Box 1980, Hobbs, NM 88241-1980 District II PO Drawer DD. Artesia, NM 88211-0719

State of New Mexico Energy, Minerals & Natural Resources Department

Form C-10. Revised February 21, 199-

Instructions on bac:

Submit to Appropriate District Offic.

OIL CONSERVATION DIVISION

District (II 1 000 Kio Brazos (Rd Azee.	NM 87410		Sa	PO Box nta Fe. NM	20 88 87 50 4-2088			•		Lease - 4 Copie Lease - 3 Copie
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7460)			S	an Juan 2	28-5 Unit					70M
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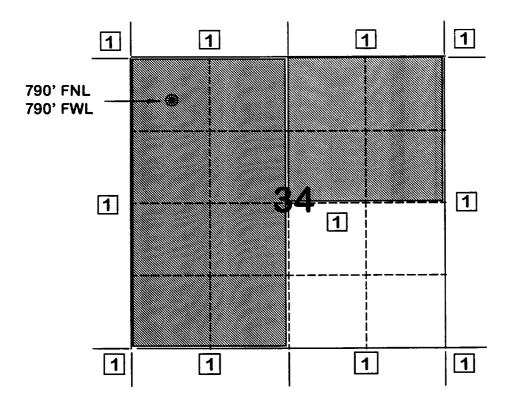
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-5 Unit #70M OFFSET OPERATOR \ OWNER PLAT

Mesaverde (N/2)/Dakota (W/2) Formations Commingle Well

Township 28 North, Range 5 West



1) Burlington Resources Oil and Gas Company

REQUESTED RECORD NOT FOUND (NEXT RECORD DISPLAYED) OPR008M1 S000 O008 CHROMATOGRAPH TEST MAIN SCREEN 15:07:46.1 05/18/97

	OPROGENI SCCC	ooo ciiiciiii	_	
	FUNCTION (A,C,D,I) MP NUMBER ERRECTIVE DATE	i 7 27 26 [\] 19951201	** DAT	TA AT TEST PRESSURE UNLESS NOTED ** UAN 28-5 UNIT 44
	REGION CD	10	GAS ME	JAN CTER - WELLHEAD SALES
-	SAMPLE LINE TEMPER	(GAS,LIQ,BTU) URE (PSIG)	GAS 199512	BTU/CF 201 (AT 14.73 PSIG) WET 1099.545 DRY 1119.000
	TEST DATE TEST PRESSURE (PS: TEST TEMPERATURE	IG) (DEG F)	60	WET _1099.545 DRY _1119.000 VAPOR FACTOR
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_	OPR008M2 S000			GAS SAMPLE DETAIL 15:07:51.9 05/18/9
	HYDROGEN	GPM MOL % (AT 14		** DATA AT 14.730 PSIG UNLESS NOTED ** MP NUMBER 72726
	HELIUM NITROGEN	0.17		EFFECTIVE DATE 19951201
				GASOLINE CONTENT (GPM) 26/70 GASOLINE 100% PROPANE
	ETHANE PROPANE	-7.12 1.9	1823	EXCESS BUTANES
	N-BUTANE		L276 L356 D659	SPECIFIC GRAVITY
	ISO-PENTANE N-PENTANE HEXANE	0.12	0435	CALCULATED0.6470 MEASURED
	HEXANE PLUS HEPTANE PLUS TOTALS		1265 3860	SULPHER GRAINS / 100 CU FT
В	03=MAIN SCREE MY JOB	EN NUM	LU #	24=HELP PA1=TERMINATE

REQUESTED RECORD NOT FOUND (NEXT RECORD DISPLAYED) OPR008M1 S001 0008 CHROMATOGRAPH TEST MAIN SCREEN 20:00:03.4 05/20/9

F F F	MP TYPE CODE	10	** DATA A SAN JUAN SAN JUAN GAS METER	AT TEST PRESSURE UNLESS NOTED ** 28-5 UNIT 24 R - WELLHEAD SALES
	SAMPLE LINE TEMPE FEST DATE FEST PRESSURE (PS FEST TEMPERATURE FEST LIFE (MONTHS FESTER SOURCE BA FEST PURPOSE CODE	(GAS,LIQ,BTU) SURE (PSIG) ERATURE (DEG F SIG) (DEG F) S) NUMBER	14.730	BTU/CF (AT 14.73 PSIG) WET 1182.084 DRY 1203.000 BTU/CF WET _1182.084 DRY _1203.000 VAPOR FACTOR
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(OPR008M2 S001			SAMPLE DETAIL 20:00:10.4 05/20/9
I I	HYDROGEN HELIUM NITROGEN	MOL % (AT 1 	4.73)	DATA AT 14.730 PSIG UNLESS NOTED ** MP NUMBER 86009 EFFECTIVE DATE 19951101
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1 1 1	ISO-BUTANE N-BUTANE ISO-PENTANE N-PENTANE HEXANE HEXANE PLUS	0.34	2322 3090 1244 0906	SPECIFIC GRAVITY CALCULATED _0.6940 MEASURED
	HEPTANE PLUS TOTALS		3894	SULPHER GRAINS / 100 CU FT
В	03=MAIN SCREE MY JOB	EN NUM	LU #3	24=HELP PA1=TERMINATE

San Juan 28-5 Unit #70M Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method

Version 1.0 3/13/94

DK-Current SAS GRAVITY COND. OR MISC. (C/M) CC 6N2 6CO2 1.43 6CO2 6H2S 0IAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) COTTOMHOLE PRESSURE (PSIA)
COND. OR MISC. (C/M) 602 6402 641
<u>DK-Original</u>
GAS GRAVITY 0.647 COND. OR MISC. (C/M) COND. OR MIS

Page No.: 1

Print Time: Tue May 20 10:44:05 1997

Property ID: 1768

Property Name: SAN JUAN 28-5 UNIT | 44 | 53421B-1 Table Name: K:\ARIES\RR98PDP\TEST.DBF

DATE	CUM_GAS	M SIWHP
09/10/60	0	2701.0 initial
10/10/60	0	2700.0
10/13/61	247000	2469.0
11/28/62	428000	2 397. 0
01/07/63	507000	2334.0
01/02/64	585000	2 347 .0
07/29/65	1109000	2034.0
08/01/66	1260000	2015.0
08/04/67	1604000	1860.0
05/10/68	1944000	1662.0
05/05/69	2322000	1443.0
06/09/70	2588760	1363.0
05/03/71	2816979	
05/30/72	3094074	
07/05/73	3344133	
01/16/76		
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04/21/90		·
0 7 /28/92	5155650	607.0 2 sures

Page No.: 1

Print Time: Tue May 20 09:45:36 1997

Property ID: 3932

Property Name: SAN JUAN 28-5 UNIT | 24 | 51853A-1 Table Name: K:\ARIES\RR98PDP\TEST.DBF

DATE	CUM_GAS		2
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06/14/60	195000		
06/13/61	249000	626.0	
07/31/62	298000	588.0	
01/07/63	312000	628.0	
01/02/64	352000	659.0	
01/26/65	391000	652.0	
08/01/66	450000	628.0	
08/04/67	489000	603.0	
05/10/68	517000	630.0	
06/09/70	591122	597.0	
05/03/71	624581	555.0	
05/30/72	664035	547.0	
04/19/74	724116	612.0	
08/02/78	820618	740.0	
05/31/82	947577	576.0	
11/02/84	999125	534.0	
11/04/86	1057169	639.0	
05/10/89	1131551	551.0	
02/18/91	1191155	525.0	
08/16/91	1208360	537.0	
08/30/93	1276889	512.0	E- unent

SAN JUAN 28-5 UNIT

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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 sixry-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:

1/2

- 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 weilbore 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;

- c) 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 J. LeMAY

Director