DISTRICT I

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

DISTRICT II

611 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

APPROVAL PROCESS :

X Administrative ___Hearing

OIL CONSERVATION DIVISION

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

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE YES x NO

perator an Juan 28-6 Unit	164 M	C 34-28N-6W	Rio Arriba
220	Well No.	Unit Ltr Sec - Twp - Rge	County
GRID NO14538 Property (0-4- 7460 ADI	NO 30-030-25732 Feder	Specing Unit Lease Types: (check 1 or more) alX , State , (and/or) Fee
GRID NO14538 Property C			
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Zone
Pool Name and Pool Code	Blanco Mesaverde - 723		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
4. Method of Production (Flowing or Artificial Lift)	flowing		278 (2) flowing
5. Bottomhole Pressure	(Current) a. 629 psi (see attachm		a. 951 psi (see attachment)
Oil Zones - Artificial Lift: Estimated Current			
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1242 psi (see attach	ment) b.	b. 3237 psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1209		BTU 1117
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	Date:	Date: n/a Rates:
•	Rates:	Rates:	Natos.
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:
8. Fixed Percentage Allocation	Oil: Gas:	Oil: Gas: %	Oil: Gas:
Formula -% for each zone (total of %'s to equal 100%)	will be supplied upon comple		will be supplied upon completion
O. Are all working, overriding, an If not, have all working, overridave all offset operators been the working of the court of the cour	d royalty interests ident ding, and royalty interes n given written notice of Yes No If yes, are fli i will the allocation form	ical in all commingled zones? its been notified by certified n the proposed downhole comm uids compatible, will the forma ula be reliablex Yes	ations not be damaged, will any cross-flow No (If No, attach explanation)
2. Are all produced fluids from al			
			es, attach explanation) sioner of Public Lands or the United Stat YesNo
5. NMOCD Reference Cases for F	Rule 303(D) Exceptions:	ORDER NO(S)R-1069	6
6. ATTACHMENTS: * C-102 for each zone * Production curve fo * For zones with no po * Data to support allo	e to be commingled show or each zone for at least roduction history, estim ocation method or formu	ving its spacing unit and acres one year. (If not available, at ated production rates and sup la. royalty interests for uncommo ents required to support comm	age dedication. tach explanation.) porting data.
<i>"</i>	mation above is true	and complete to the best	of my knowledge and belief.

District i PO Box 1980, Hobbs, NM \$2241-1980 District ii PO Drawer OD, Artena, NM \$2211-0719 District iii 1000 Rio Brano Rd., Aziec, NM \$7410

District IV

State of New Mexico Energy, Minerale & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form Revised February 21. Instructions or

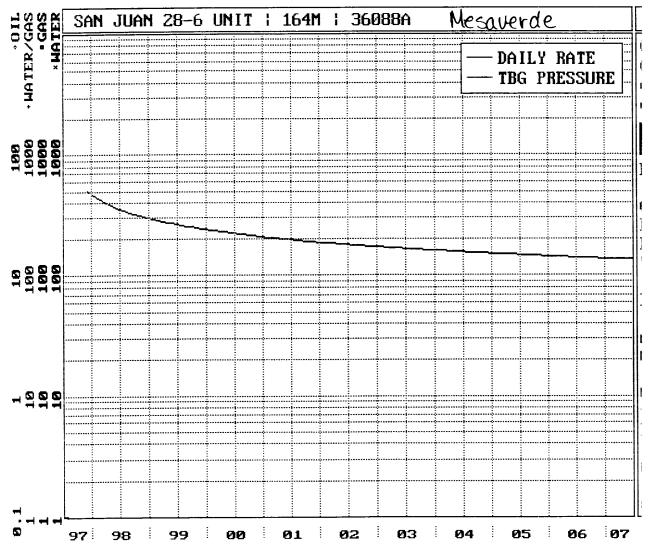
Submit to Appropriate District
State Lease - 4 (

Fee Lease - 3 (

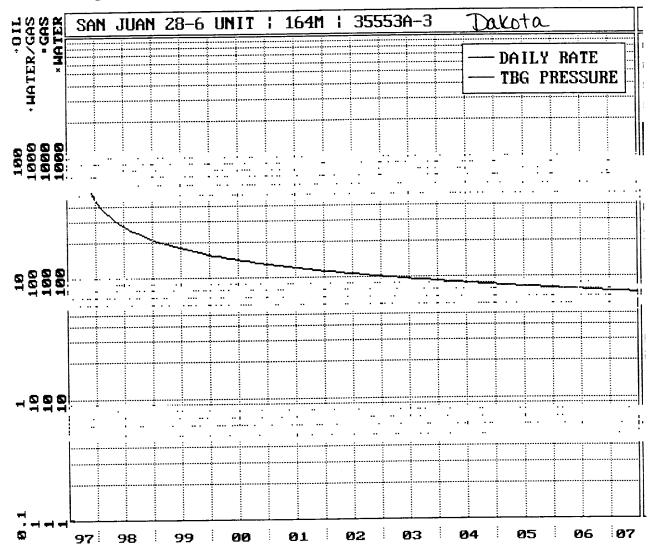
Number	WEI	LL LO	CATION						
Number				I AND ACI	REAGE DEDI	CATION PL	.AT		
					Poet Name Blanco Mesaverde/Basin Dakota				
de				' Property	Name			Well Number	
	San Juan 28-6 Unit							164M	
•	¹ Operator Name							'Elmono	
	BU	RLING	TON RE	SOURCES	OIL & GAS	COMPANY		6577'	
		-		10 Surtace	Location			-	
Section To	-	Range	Lot Ida	Fest from the	North/South line	Feet from the	East/West line	Cassay	
34 28	-N	6-W		790	North	1525	West	R.A.	
		11 Bot	tom Hole	Location	if Different Fr	om Surface			
Section To	reseip	Range	Lot Ida	Feet from the	North/South line	Fost from the	East/West tipe	County	
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BLE WIL	L BE A	SSIGNE	р то тн	IS COMPLET)NSOLID.	
	UK A			UNII INAS I	EEN APPROVEL				
5'	e	57	280.00			I hereby cert	ujy that the informana	n contained A	
	Section Tov. 34 28 Section Tov. 3 Joint or in	Section Township 34 28-N Section Township 3 Joint or Infill 1" C	BURLING Section Township Range 34 28-N 6-W 11 Bot Section Township Range 3 Joint or Infill "Consecutation 9 ABLE WILL BE ASSIGNE OR A NON-ST	BURLINGTON RE Section Township Range Lot Ida 34 28-N 6-W 12 Bottom Hole Section Township Range Lot Ida 39 Joint or Infill "Consocidation Code "Code 9 ABLE WILL BE ASSIGNED TO THE OR A NON-STANDARD 5 280.00	BURLINGTON RESOURCES 10 Surface Section Township Range Let Ida Fest from the 34 28-N 6-W 790 11 Bottom Hole Location Section Township Range Let Ida Fest from the 39 Joint or Infill 1" Consectidation Code 1" Order No. 39 ABLE WILL BE ASSIGNED TO THIS COMPLET OR A NON-STANDARD UNIT HAS E	BURLINGTON RESOURCES OIL & GAS Surface Location	BURLINGTON RESOURCES OIL & GAS COMPANY 10 Surface Location Section Township Range Lot Ida Feet from the North/South line Feet from the 34 28-N 6-W 790 North 1525 11 Bottom Hole Location if Different From Surface Section Township Range Lot Ida Feet from the North/South line Feet from the Section Township Range Lot Ida Feet from the North/South line Feet from the OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIV 17 OPE I hereby cert from shall be assigned to This Completion Unit Lall Interests in the Section Approved By The Div 17 OPE I hereby cert from shall be assigned to This Completion Unit Lall Interests in the Section Approved By The Div 18 OPE I hereby cert from shall be assigned to This Completion Unit Lall Interests in the Section Approved By The Div 18 OPE I hereby cert from shall be assigned to This Completion Unit Lall Interests and contains the Interest of the Inter	BURLINGTON RESOURCES OIL & GAS COMPANY Surface Location Section Township Range Lot ida Feat from the North/South line Feat from the East/West line 34 28-N 6-W 790 North 1525 West 11 Bottom Hole Location if Different From Surface Section Township Range Lot ida Feat from the North/South line Feat from the East/West line 12 Bottom Hole Location if Different From Surface Section Township Range Lot ida Feat from the North/South line Feat from the East/West line 34 28-N 6-W 790 North 1525 West 15 Bottom Hole Location if Different From Surface Section Township Range Lot ida Feat from the North/South line Feat from the East/West line 34 28-N 6-W 790 North 1525 West 16 Bottom Hole Location if Different From Surface Section Township Range Lot ida Feat from the North/South line Feat from the East/West line 17 OPERATOR CER 18 I hereby cerefy that the information between the location in the best of my	

Signature Peggy Bradfield Regulatory Administra Title 355.90 ∞ Date ∞ 1 5 3 5 correct to the best of my belief. 5/23/97 Date of Survey NMSF-079051 2 5280.00

EXPECTED PRODUCTION CURVE



EXPECTED PRODUCTION CURVE

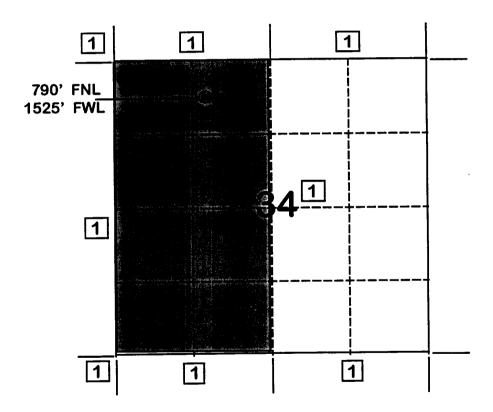


BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 28-6 Unit #164M OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingle Well

Township 28 North, Range 6 West



1) Burlington Resources Oil and Gas Company

San Juan 28-6 Unit #164M

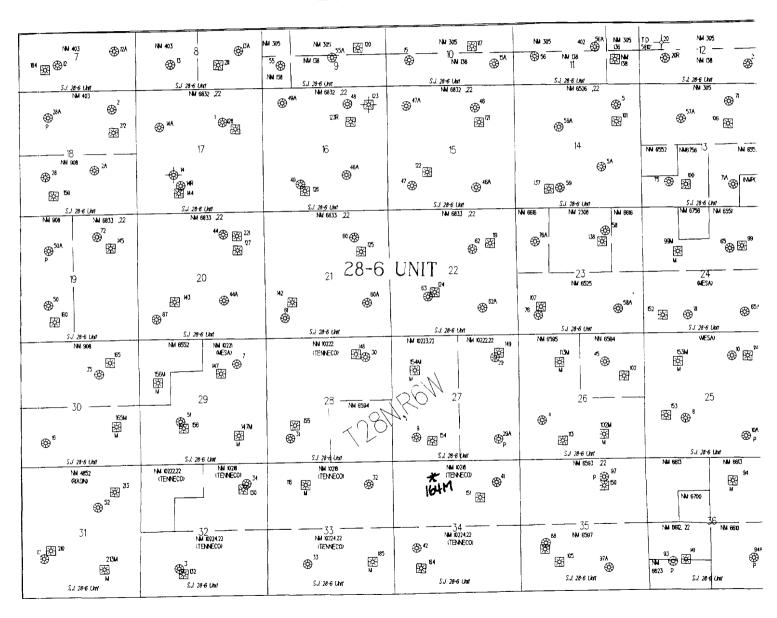
Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method Version 1.0 3/13/94

Mesaverde	Dakota			
MV-Current	<u>DK-Current</u>			
### COND. OR MISC. (C/M) ### COND. OR MISC. (C/M) ### CO2 #### CO31 ##### CO31 ###### CO31 ###### CO31 ###################################	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)	0.654 C 0.17 1.18 0 1.5 7878 60 198 0 791		
MV-Original	<u>DK-Original</u>			
GIAS 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) 1054	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)	0.654 C 0.17 1.18 0 1.5 7878 60 198 C 2652		

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Page No.: 7
   Print Time: Fri Oct 17 14:11:33 1997
  Property ID: 1873
Property Name: SAN JUAN 28-6 UNIT | 164 | 44098A-1
   Table Name: K:\ARIES\RR98PDP\TEST.DBF
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--DATE-- ---CUM GAS-- M SIWHP
Mcf.....Psi
                     2652.0- Original
08/02/72
                       1850.0
                29711
09/27/72
                       1132.0
               162814
08/21/73
                        910.0
07/31/74
               250935
                        988.0
09/04/75
               329888
                        781.0
08/08/77
               457692
               536175
                        844.0
04/17/79
                        834.0
               642500
09/29/81
                        863.0
               705160
09/22/83
                       1010.0
               749410
06/07/85
                        871.0
               855807
07/08/88
                        791.0 - Current
                        802.0
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06/08/90
              1033841
08/06/92
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   Print Time: Fri Oct 17 14:11:31 1997
 Property ID: 4017
Property Name: SAN JUAN 28-6 UNIT | 41 | 49161A-1
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         --- CUM GAS-- M SIWHP
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12/20/55
                                                  Mesaverde Cffset
                        712.0
                85000
08/24/56
                        694.0
               164000
10/30/57
                        635.0
               228000
11/06/58
                         718.0
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06/14/59
                        749.0
                285000
06/14/60
                         684.0
                336000
06/13/61
                         679.0
05/29/62
                373000
                         658.0
                414000
05/16/63
                         593.0
                461000
05/26/64
                         590.0
                501000
03/08/65
                         575.0
                554000
04/12/66
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03/22/67
                594000
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                634000
04/01/68
                         601.0
                722242
05/25/70
                         562.0
                768570
05/04/71
                812999
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05/22/72
                         577.0
                897982
07/31/74
                         596.0
07/12/76
                956696
                         630.0
               1014679
05/15/78
                         500.0
               1066149
10/13/80
                         632.0
               1118249
05/18/82
                         579.0
               1165244
06/06/84
                         593.0
               1211250
04/07/86
               1286936
                         582.0
09/18/89
                         612.0
               1322844
06/05/91
                         600.0
06/17/91
               1322969
                         542.0 - Curient
               1377653
05/03/93
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San Juan 28-6 Unit #164M Blanco Mesaverde / Basin Dakota 28N-06W-34C



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;
 - c) 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.