DISTRICT I

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

State of New Mexico
Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION

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

DISTRICT II

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

DISTRICT III

SIGNATURE

TYPE OR PRINT NAME Dan T. Voecks

1000 Rio Brazos Rd, Aztec, NM 87410-1693

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

APPROVAL PROCESS: _X_ Administrative ___Hearing **EXISTING WELLBORE**

2-16-99

DATE:

(505) 326-9700

APPLICATION FOR DOWNHOLE COMMINGLING __ YES __x_ NO PO Box 4289, Farmington, NM 87499 **Burlington Resources Oil & Gas Company** P 28-28N-06W Rio Arriba 148M San Juan 28-6 Unit County Well No. Unit Ltr. - Sec - Twp - Rge 91111 API NO. 30-039-not assigned OGRID NO. 14538 **Property Code** The following facts are submitted in support of downhole commingling: Intermediate Zone Upper 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 will be supplied upon completion 3. Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) flowing flowing (Current) a. 557 psi (see attachment) a. 816 psi (see attachment) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: 7 1000 (Original) . 1295 psi (see attachment) b. 3103 psi (see attachment) All Gas Zones: Estimated or Measured Original CONL DIV BTU 1239 BTU 1093 6. Oil Gravity (API) or Gas BTU Content 7. Producing or Shut-In? shut in shut in Production Marginal? (yes or no) yes Date: n/a If Shut-In and oil/gas/water rates of Date: n/a Date: last production Rates: Rates: Rates: If Producing, give data and oil/gas/water water of recent test (within 60 days) Date: n/a Date: n/a Date: Rates: Rates: Rates: Gas: % Gas: % 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) Oil: will be supplied upon completion If allocation formula is based upon something other than current or past production, or is based upon some other method, submit attachments with supporting data and/or explaining method and providing rate projections or other required data. 10. Are all working, overriding, and royalty interests identical in all commingled zones? If not, have all working, overriding, and royalty interests been notified by certified mail? Have all offset operators been given written notice of the proposed downhole commingling? Will cross-flow occur? _x__ Yes __ No _ If yes, are fluids compatible, will the formations not be damaged, will any cross-flowed production be recovered, and will the allocation formula be reliable. _x__ Yes _____No (If No, attach explanation) 11. Will cross-flow occur? 12. Are all produced fluids from all commingled zones compatible with each other? __x_ Yes ___ No 13. Will the value of production be decreased by commingling? ___ Yes _X_ No (If Yes, attach explanation) 14. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United States Bureau of Land Management has been notified in writing of this application. _X_Yes ___ No 15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). ___Reference Order _ R-10696 16. ATTACHMENTS: * C-102 for each zone to be commingled showing its spacing unit and acreage dedication. * Production curve for each zone for at least one year. (If not available, attach explanation.) * For zones with no production history, estimated production rates and supporting data. * Data to support allocation method or formula. * Notification list of all offset operators. * Notification list of working, overriding, and royalty interests for uncommon interest cases. * Any additional statements, data, or documents required to support commingling.

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

TITLE:

Production Engineer

TELEPHONE NO.

District I PO Box 1980, Hobbs, NM 88241-1980

District II PO Drawer DD, Antesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

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

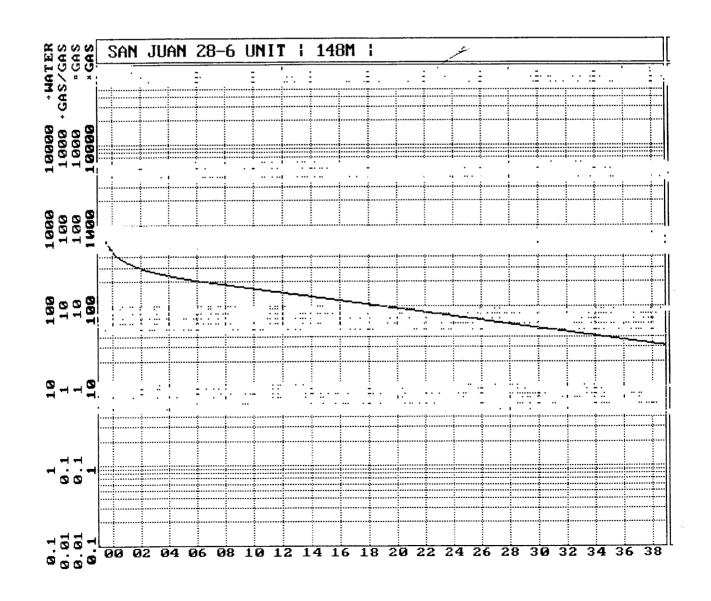
Form C-102 Revised February 21, 1992 Instructions on back

Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

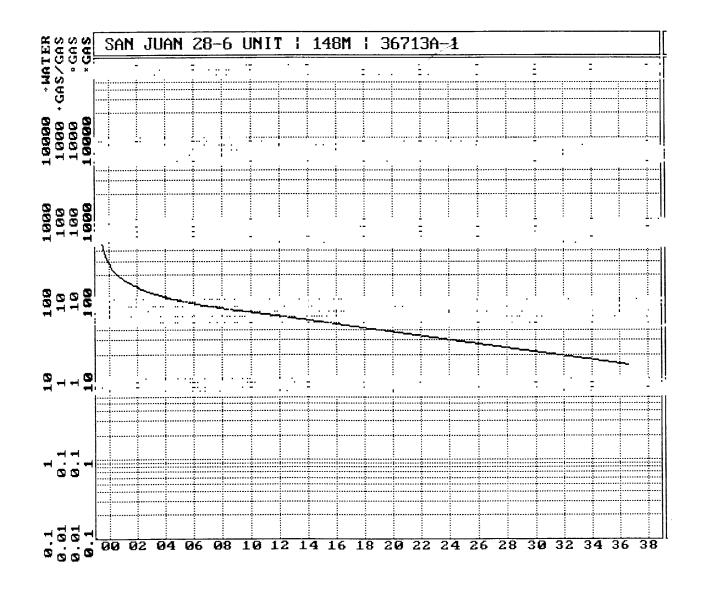
AMENDED REPORT

			WELL	LOCATI	ON AN	D AC	REAGE	DED1	[CAT	ION PL	.AT		
14	Pool Code				'Pool Name								
30-039							lanco Mesaverde/Basin Dakota						
Property 7462	Code	³Property Name SAN JUAN 28-6 UNIT								Well Number 148M			
'OGRID	No.	*Operator Name								*Elevation			
14538		BURLINGTON RESOURCES OIL & GAS COMPANY								E	5577		
¹⁰ Surface Location													
U. or lot no.	Section 28	28N					Feet from the 6		East/We EA		County RIO ARRIBA		
			Bottom Hole Locatio		on If	If Different		From Surface		ace			
UL or lot no.	Section	Township	Range	Lot Idn	Feet from	n the	North/Sout	th line	Fee	it from the	East/He	est line	County
	<u> </u>	10			15 Order		<u> </u>		<u> </u>				
MV-E/32		¹³ Joint or In	fili Lone	solidation Code	- Urber	NO.							
DK-E/32		<u> </u>											
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San Juan 28-6 Unit #148M Expected Production Curve Mesaverde Formation



San Juan 28-6 Unit #148M Expected Production Curve Dakota Formation



SJ 28-6 Unit #148M

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

Mesaverd e	Dakota
<u>MV-Current</u>	<u>DK-Current</u>
GAS GRAVITY COND. OR MISC. (C/M) C %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) SURFACE PSIA GOVERNMENT 10.728 0.728 0.728 60 60 60 60 60 60 60 60 60 6	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.14 %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) 816.3
MV-Original	<u>DK-Original</u>
GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 1094 BOTTOMHOLE PRESSURE (PSIA) 1295.2	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.14 %CO2 1.31 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 0.64 0.64 0.64 0.64 0.64 0.65 0.64 0.64 0.64 0.65 0.60 0.64 0.64 0.64 0.64 0.64 0.64 0.64

Page No.: 1

Print Time: Tue Feb 09 15:23:46 1999

Property ID: 1833

Property Name: SAN JUAN 28-6 UNIT | 30 | 49404A-1 Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

DATE	CUM_GAS Mcf	M SIWHP
11/21/55	0	1094.0
08/24/56	123000	734.0
05/24/57	197000	773.0
05/22/60	238000	741.0
12/22/61	349000	713.0
05/29/62	370000	719.0
05/16/63	428000	700.0
05/26/64	478000	692.0
03/25/65	0	0.0
09/08/65	556000	611.0
04/12/66	593000	608.0
03/22/67	651000	599.0
04/01/68	706000	588.0
05/25/70	820307	514.0
05/04/71	873728	493.0
05/22/72	927416	
07/31/74	1040334	428.0
07/12/76	1126294	
05/15/78	1187870	
04/18/80	1250745	472.0
05/18/82	1299729	
04/07/86	1352052 1405360	461.0 492.0
09/19/91	1405360	492.0
10/21/91	1408579	400.0

San Juan 28-6 Unit #148M

Mesaverde Offset

Page No.: 1

Print Time: Tue Feb 09 15:22:01 1999

Property ID: 1741

Property Name: SAN JUAN 28-6 UNIT | 148 | 52356A-1 Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

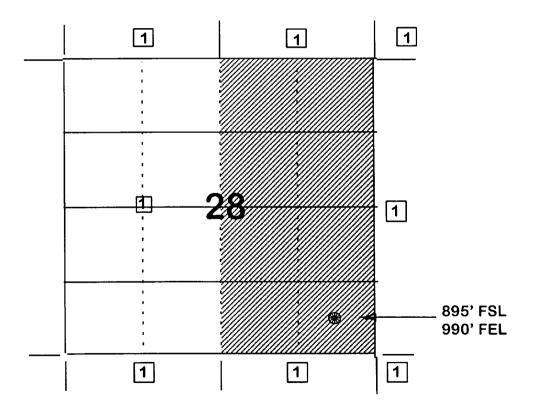
DATE	CUM_GAS		
04/29/70	0	2566.0	San Juan 28-6 Unit #148M
12/28/70	62751	1485.0	
05/04/71	130161	1088.0	Dakota Offset
05/22/72	242200	862.0	
08/21/73	344518	967.0	
06/24/75	480204	695.0	
07/12/76	555153	636.0	
08/08/77	616530	677.0	
10/01/79	737785	654.0	
10/14/81	831202	689.0	
09/22/83	908829	748.0	
11/07/85	989375	768.0	
06/03/90	1147438	822.0	
04/29/92	1231231	687.0	

BURLINGTON RESOURCES OIL AND GAS COMPANY

OFFSET OPERATOR \ OWNER PLAT San Juan 28-6 Unit #148M

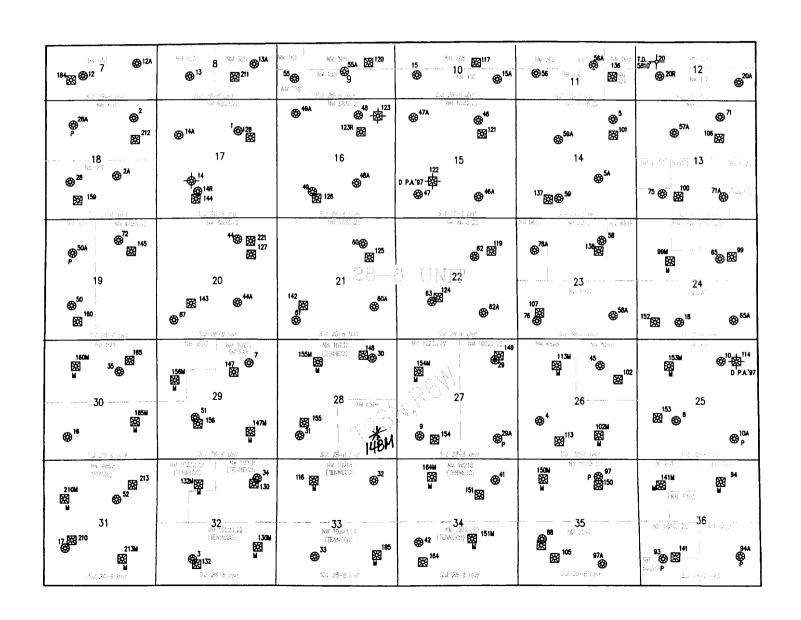
Mesaverde/Dakota Formations Commingled well

Township 28 North, Range 6 West



1) Burlington Resources

San Juan 28-6 Unit #148M Blanco Mesaverde / Basin Dakota 28N - 6W - 28



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.