## BURLINGTON RESOURCES

SAN JUAN DIVISION

August 25, 1997

SENT FEDERAL EXPRESS

Mr. David Catanach New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505 DECEMBER 20 12-7 FORL COSE, DIVINOUS S

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He:

Allen Com #1A

31560'FNL, 1140'FWL Section 16, T-31-N, R-09-W, San Juan County, NM

API #30-045-23572

Dear Mr. Catanach:

This is in reply to your concern of June 23, 1997 regarding the marginality of the Pictured Cliffs in our application for downhole commingling of the subject well. We have attached maps to show that this recompletion is moving away from economic production and heading southeast into the undeveloped marginal area of Township 31 North, Range 9 West.

We have also attached the economic analysis graph from Order R-10692 for the commingling of the San Juan 32-9 Unit for the Pictured Cliffs, which is analogous to this well. This graph will show that the subject well when superimposed on the graph indicates a marginal well for dual completion; therefore, an appropriate candidate for commingling.

We estimate that this recompletion will result in approximately 950 M<sup>2</sup>CFG (EUR) of reserves with an initial 195 MCFD of production. The four offsetting wells average approximately 610 M<sup>2</sup>CFG (the best of the offset wells has 1.11 MCF remaining) of remaining reserves, which compares favorably with the estimated 950 M<sup>2</sup>CFG of recoverable gas for this recompletion.

Please note also that we have made application on the Sunray G #1A (NW 21-31-9), to add the Pictured Cliffs and commingle with the existing Mesa Verde. This application is currently being reviewed by your office, and is in the same category as the Allen Com #1A.

We appreciate your reconsideration of this application. Please let me know if you require additional data.

Sincerely,

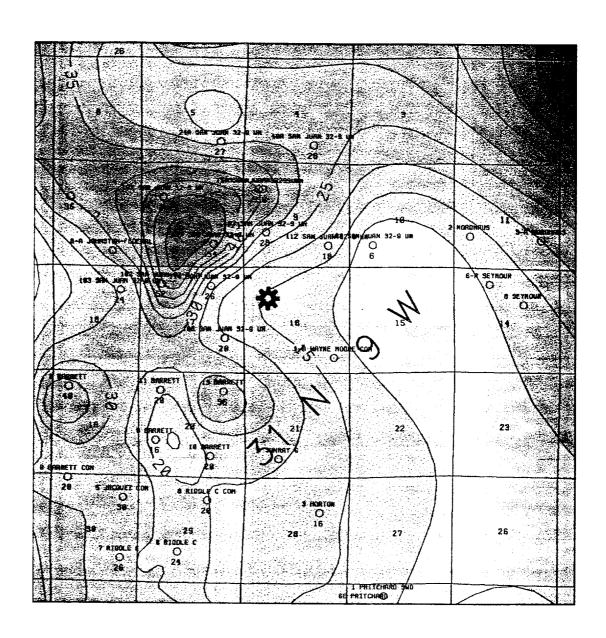
Peggy Bradfield

Regulatory/Compliance Administrator

xc:

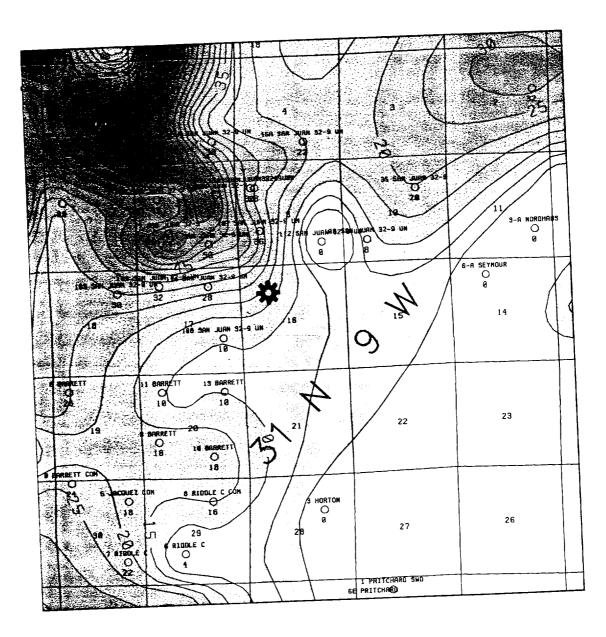
NMOCD - Aztec District

Bureau of Land Management - hand delivered



BURLINGTON RESOURCES D&G
SAN JUAN DIVISION

ALLEN COM #1-A (NW 16-31N-9WI PICTURED CLIFFS DENSITY ISOPACH CONTOUR INTERVAL = 5 FT. ISOPACH DENSITY POROSITY > 10 %



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ALLEN COM #1-A (NW 16-31N-9W) PICTURED CLIFFS NET PAY ISOPACH CONTOUR INTERVAL = 5 FT. NET PAY = RESISTIVITY > 20 OHM-M		
	are OEC	== 22-AUG-87
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## PC ECONOMIC LIMITS

**20% AFIT** 

