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

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

APPROVAL PROCESS: _X_ Administrative ___Hearing

DISTRICT III

1000 Rio Brazos Rd, Aztec, NM 87410-1693

APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE YES _x_NO

Wall No. Unit Lit Sac Top Rige	
Specing unit Less Types: (check to Specing Unit Les	 Juan
Company Comp	
The following facts are submitted in support of downhole commingling: 1. Pool Name and Pool Code 2. Top and Bottom of Pool Code 2. Top and Bottom of Pool Code 3. Type of production (Perforations) 3. Type of production (Perforations) 4. Method of Production (Polor Code) 5. Bottomhole Pressure 6. Bottomhole Pressure 6. Bottomhole Pressure 6. Bottomhole Pressure 6. Current (Polor Code) 7. Production of Measured Current Gas & Oil - Flowing 7. Production of Wessured Current 7. Production Marginal? (yes or no) 8. Fixed Polor (Polor Code) 8. Fixed Polor (Polor Code) 8. Fixed Percentage Allocation formula is based upon something other than current or past production, or is based upon some other match and production for that supporting data and/or explaint ing mich and or production, or is based upon some other match and production formula is based upon something other than current or past production, or is based upon some other match match with supporting data and/or explaint ing mich and or production or other required formula is based upon something other than current or past production, or is based upon some other match match with supporting data and/or explaint ing mich and or production or other required and off in the production of the supplied upon completion of the supplie	•
2. Pop Name and Production	
1. Pool Name and Pool Code 2. Top and Bottom of Prey Section (Perforations) 3. Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current All Gas Zones: Setimated Current All Gas Zones: Massured Current All Gas Zones: Missured Current All Gas Zones: Setimated or Measured Original 5. Oil Gravity (API) or Gas BTU Content 7. Production Marginal? (yes or no) 18 If Shut-in and oil/gas/water rates of last production 19 If Shut-in and oil/gas/water rates of last production 19 If Shut-in and oil/gas/water rates of last production 19 If Shut-in and oil/gas/water rates of last production 19 If Shut-in and oil/gas/water rates of last production 19 If Shut-in and oil/gas/water rates of last production 10 If Production 11 If Production 12 If Production 13 If Production 14 If Production 15 If Production 16 If Production 17 If Production 18 If Production 18 If Production 19 If If Production 20 If Production 21 If Production 22 If Production 23 If Production 24 If Production 25 If Production 26 If Production 26 If Production 26 If Production 27 If Production 28 If Production 28 If Production 29 If If Production 20 If Production 21 If Production 21 If Production 22 If Production 23 If Production 24 If Production 25 If Production 26 If Production 26 If Production 27 If Production 27 If Production 28 If Production 29 If Production 20 If Production 20 If Producti	
Pool Code 2. Top and Bottom of Pay Section (Perforations) 3. Type of production (Perforations) 3. Type of production (Perforations) 4. Method of Production (Flowing or Artificial Lift) 5. Bottomhole Pressure 6. All Gas Zones 7. Producing or Artificial Lift: 8. Bottomhole Pressure 9. Current 1. A 459 psi (see attachment) 1. Coriginal 1. Lift: 9. Corig	
Pay Section (Perforations) 3. Type of production (Oil or Gas) 4. Method of Production (Flowing or Artificial Lift) 5. Bottomhole Presume (Current) 6. Gil Graving (Current) 8. 489 psi (see attachment) 8. 1235 psi (see attachment) 9. 1235 psi (
4. Method of Production (Flowing or Artificial Lift) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: All Gas Zones: Estimated Or Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Or Messured Current Corrent Gas & Oil - Flowing: All Gas Zones: Estimated of Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: Estimated of Messured Current Corrent Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Or Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Or Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Or Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Or Messured Current Bottomhole Pressure Oil Zones - Artificial Lift: (Original) Di 2 4 1998 Inowing Inow	completion
4. Method of Production (Flowing or Artificial Lift) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Gas & Oil - Flowing: a. 469 psi (see attachment) b. 20 psi (see attachment) b. 224 psi (see attachment) consumer of the set of the see attachment) consumer of the see attachment of the see attachme	
(Flowing or Artificial Lift) 5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current Estimated or Measured Original b. 1235 psi (see attachment) District BTU 987 BTU 1082 BTU 1082 BTU 1082 T. Producting or Shut-In? Production Marginal? (yes or no) If Shut-In and oil/gas/water rates of last production history. If Shut-In and oil/gas/water rates of last production bitsory. If Producing, give data and oil/gas/water history. If Producing, give data and oil/gas/water water of recent test (within 60 days) Fix of Producing of Shut-In? Bette: Obte: n/a Rates: Rates: Date: n/a Rates: Coli: ¼ Gas: ¼ will be supplied upon completion Formula -% for each zone (total of %'s to equal 100%) If allocation formula is based upon something other than current or past productions or other required data. O. Are all working, overriding, and royalty interests been notified by certified mail? The produced fluids from all commingled zones? Will to cross-flow occur? _ X - Yes _ No (if No, attach explanation) Will the value of production be decreased by commingling? _ Yes _ X No (if No, attach explanation) Will the value of production be decreased by commingling? _ Yes _ X No (if Yes, attach explanation)	·
Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Old Gas Zones: Stimated or Measured Current All Gas Zones: Stimated or Measured Original b. 1235 psi (see attachment) b. 1236 psi (see attachments) psi (see attachments) b. 1236 psi (se	
Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Messured Original b. 1235 psi (see attachment) b. 1236 psi (see attachment) b. 1237 psi (see attachment) b. 1236 psi (see attachment) psi (see attachment) b. 1236 psi (see attachment) b. 1236 psi (see attachment) b. 1236 psi (see attachment) psi (see attachment) b. 1236 psi (see attachment) psi (see attachment) b. 1236 psi (see attachment) psi (see attachment) psi (see attachment) psi (see attachment) psi (see attachments psi (see attachment) psi (se	ment)
Gas & Oil - Flowing: Measured Current All Gas Zones: Measured Original b. 1235 psi (see attachment) b. 1236 psi (see attachment) b. 1032 psi (see attachments b. 1035 psi (see attachments b. 1035 psi (see attachments b. 1035 psi (see attachments b. 1032 psi (see attachments pattachments contachments contachments contachme	,
All Gas Zones: Estimated or Measured Original 6. Oil Gravity (API) or Gas BTU Content 7. Producting or Shut-in? shut in Production Marginal? (yes or no) no yes If Shut-in and oil/gas/water rates of last production history. If Shut-in and oil/gas/water rates of last production history. If Producting, give data and oil/gas/water of recent test (within 60 days) If Producing, give data and oil/gas/water of recent test (within 60 days) B. Fixed Porcentage Allocation Formula % for each zone (total of % s to equal 100%) If allocation formula is based upon something other than current or past production, or is based upon some other matatachments with supporting data and/or explaining method and providing rate projections or other required data. O. 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? YesNo Have all offset operators been given written notice of the proposed downhole commingling? YesNo No (If No, attach explanation) Will the value of production be decreased by commingling?yesNo (If Yes, attach explanation)	hment)
8. Fixed Percentage Allocation Formula % for each zone (total of % s to equal 100%) 9. If allocation formula is based upon something other than current or past production, or is based upon some other matatachments with supporting data and/or explaining method and providing rate projections or other required data. 9. If allocation formula is based upon something other than current or past production, or is based upon some other matatachments with supporting data and/or explaining method and providing rate projections or other required data. 9. If allocation formula is based upon something other than current or past production, or is based upon some other matatachments 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? 11. Will cross-flow occur? _x_ yes _ No If yes, are fluids compatible, will the formations not be damaged, will any production be recovered, and will the allocation formula be reliablex_ yes _ No (If No, attach explanation) 12. Are all produced fluids from all commingled zones compatible with each other? _x_ yes _ No (If Yes, attach explanation)	
Production Marginal? (yes or no) If Shut-In and oil/gas/water rates of last production Note: For new some with ne production production passes with ne production distory, applicant shall product distant production distant production states in a supporting state. Note: For new some with ne production bistory, applicant shall product of states production distant production distant production distant production distant production distant production and oil/gas/water water of recent test (within 60 days) Date: n/a Rates: Date: n/a Rates: Rates: B. Fixed Percentage Allocation Formula % for each zone (total of %'s to equal 100%) Oil: % Gas: % will be supplied upon completion Oil: % Gas: % will be supplied upon completion Oil: % Gas: % will be supplied upon completion or other required data. O. 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? Yes No Have all offset operators been given written notice of the proposed downhole commingling? Yes No Will cross-flow occur? x_ Yes No If yes, are fluids compatible, will the formations not be damaged, will any production be recovered, and will the allocation formula be reliable x_ Yes No Will the value of production be decreased by commingling? Yes No Will the value of production be decreased by commingling? Yes No (If Yes, attach explanation)	
* If Shut-in and oil/gas/water rates of last production Note: For new zones with no production history, applicant shall be required to stack production * If Producing, give data and oil/gas/water water of recent test (within 60 days) * If Producing, give data and oil/gas/water water of recent test (within 60 days) * If Producing, give data and oil/gas/water water of recent test (within 60 days) * If allocation formula is based upon something other than current or past production, or is based upon some other mattachments with supporting data and/or explaining method and providing rate projections or other required data. * If allocation formula is based upon something other than current or past production, or is based upon some other mattachments with supporting data and/or explaining method and providing rate projections or other required data. * O. 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? Yes No	
Rates: R	
Rates: R	
* If Producing, give data and oil/gas/water water of recent test (within 60 days) * If Producing, give data and oil/gas/water water of recent test (within 60 days) * Pate: n/a Rates: * Rates: * Rates: * Rates: * Rates: * Rates: * Poli: 'A Gas: 'A Will be supplied upon completion * A gas: 'A Will be supplied upon completion * A gas: 'A Will be supplied upon completion * Will be supplied upon completion * Yes _ X No If not, have all working, overriding, and royalty interests identical in all commingled zones?	
Oil: gas/water water of recent test (within 60 days) 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%) 9. If allocation formula is based upon something other than current or past production, or is based upon some other mattachments 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? 11. Will cross-flow occur? 12. Yes 13. No 14. Will cross-flow occur? 14. Yes 15. No 16. No 16. Yes 16. Gas: 16. Will cross-flow occur? 17. Yes 18. Rates: 18. Rates: 19. Gas: 10. Will complete upon completion 10. Will cross-flow occur? 10. Are all working, overriding, and royalty interests been notified by certified mail? 16. Yes 17. Yes 18. Gas: 19. Will complete upon completion 19. Will complete upon completion 10. Will cross-flow occur? 10. Are all working, overriding, and royalty interests identical in all commingled zones? 10. Are all working, overriding, and royalty interests been notified by certified mail? 18. Yes 19. No 19. If allocation formula is based upon something other than current or past production, or is based upon some other mattachments with supplied upon completion 19. If allocation formula is based upon something will be supplied upon completion 10. Will complete upon complete upon complete upon completion 19. If allocation formula is based upon something upon complete upon complete upon complete upon complete upon complete upo	
(within 60 days) Rates: Plan Rates: Rates: Plan Rates: Plan Rates: Plan Rates: Plan	
Formula -% for each zone (total of %'s to equal 100%) Solution Solution	
Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone (total of %'s to equal 100%) Formula -% for each zone zone (total of x = x = x = x = x = x = x = x = x = x	
9. If allocation formula is based upon something other than current or past production, or is based upon some other mattachments 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? 11. If not, have all working, overriding, and royalty interests been notified by certified mail? 12. Are all offset operators been given written notice of the proposed downhole commingling? 13. Will cross-flow occur? 14. Yes No If yes, are fluids compatible, will the formations not be damaged, will any production be recovered, and will the allocation formula be reliablex Yes No (If No, attach explanation) 13. Will the value of production be decreased by commingling? YesX_ No (If Yes, attach explanation)	
O. 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? 1. Will cross-flow occur? If yes in the proposed downhole commingling? If yes in the proposed downhole commingli	pletion
O. 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? 1. Will cross-flow occur? _xYes No	ethod, subm
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? 1. Will cross-flow occur? _x_ Yes No	
1. Will cross-flow occur? _x_ Yes _ No If yes, are fluids compatible, will the formations not be damaged, will any production be recovered, and will the allocation formula be reliablex_ YesNo (If No, attach explanation) 2. Are all produced fluids from all commingled zones compatible with each other?x_YesNo 3. Will the value of production be decreased by commingling?Yes _X_No (If Yes, attach explanation)	
Are all produced fluids from all commingled zones compatible with each other?x_Yes No Will the value of production be decreased by commingling?Yes _X_No (If Yes, attach explanation)	cross-flowe
3. Will the value of production be decreased by commingling?Yes _X_ No (If Yes, attach explanation)	
· · · · · · · · · · · · · · · ·	
4. If this well is on, or communitized with, state or federal lands, either the Commissioner of Public Lands or the United State Land Management has been notified in writing of this applicationXYes No	ites Bureau e
5. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S)Reference Order R-9918 attached	
6 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 of the standard or formula.	
* 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.	
hereby certify that the information above is true and complete to the best of my knowledge and belief.	
SIGNATURE San Workerton TITLE: Reservoir Engineer DATE: 06-23-98	

and the second second

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

District II PO Drawer DD, Artesia, 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, 1994 Instructions on back Submit to Appropriate District Office

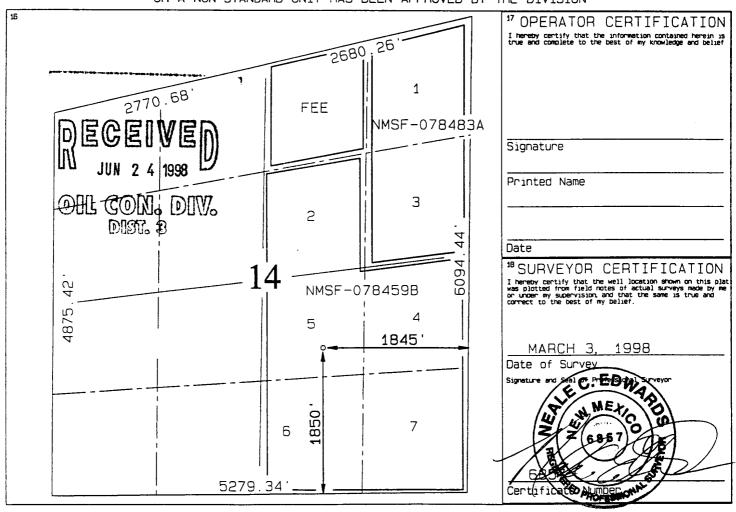
Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

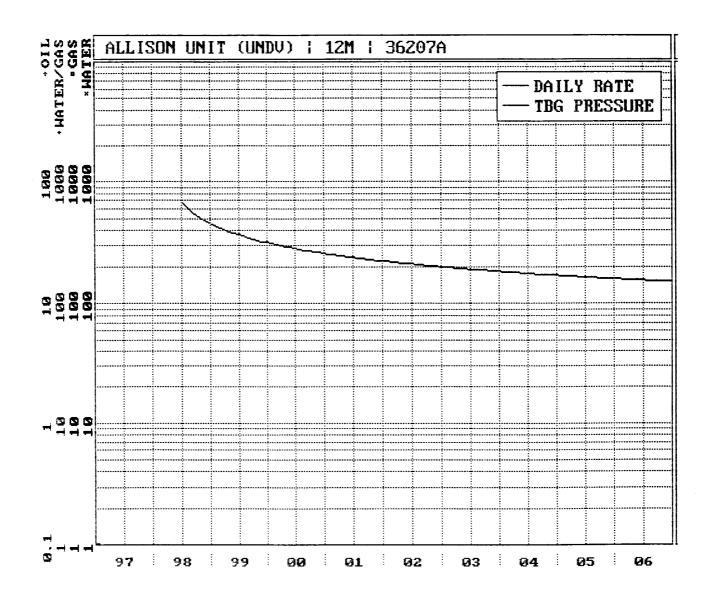
WFII	LOCATION	Δ N \Box	ACREAGE	DEDICATION	ΡΙΔΤ
, , , , , , , , , , , , , , , , , , ,		\neg		DETATOM	

3,	API Numbe	SL.		*Pool Coo	ie		Pool Nam	ne .	
*Property	Code				°Property ALLISON			• 6	Well Number
'OGRID	No.		BURLI	NGTON	Operator RESOURCES	Name S OIL & GAS	COMPANY	•	Elevation 6841
					¹⁰ Surface	Location			
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	14	32N	7W		1850	SOUTH	1845	EAST	SAN JUAN
		¹¹ E	Bottom	Hole L	ocation I	f Different	From Surf	ace	
UL or lat no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
12 Dedicated Acres		¹³ Joint or In	fill ¹⁴ Cons	olidation Code	¹⁵ Order No.	•		1	

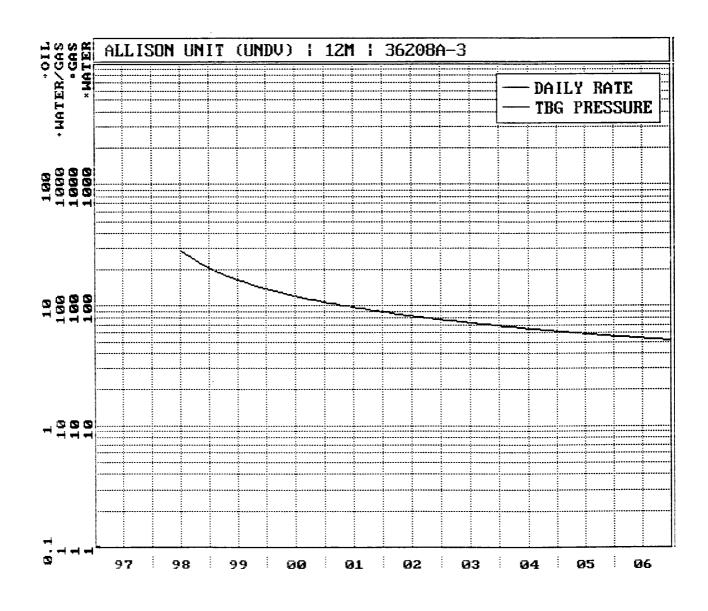
NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



Allison Unit #12M Expected Production Curve Blanco Mesaverde



Allison Unit #12M Expected Production Curve Basin Dakota



Allison Unit #12M

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

Mesaverde	Dakota
<u>MV-Current</u>	<u>DK-Current</u>
GAS GRAVITY 0.592 COND. OR MISC. (C/M) C %N2 1.46 %CO2 2.58 %H2S 0 DIAMETER (IN) 2.375 DEPTH (FT) 6077 SURFACE TEMPERATURE (DEG F) 60 BOTTOMHOLE TEMPERATURE (DEG F) 137 FLOWRATE (MCFPD) 0 SURFACE PRESSURE (PSIA) 413 BOTTOMHOLE PRESSURE (PSIA) 469.2	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) 691.7
MV-Original	DK-Original
GAS GRAVITY COND. OR MISC. (C/M) %N2 1.46 %CO2 2.58 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 0.592 C 0.592 C 0 1.46 60 60 60 60 60 60 60 60 60	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) 3224.1

Page No.: 3

Print Time: Tue Dec 30 07:32:12 1997

Property ID: 2414

Property Name: ALLISON UNIT | 28 | 51697A-1

Table Name: K:\ARIES\RR98PDP\TEST.DBF

Allison Unit #12M Mesaverde Offset Page No.: 1

Print Time: Tue Dec 30 07:32:09 1997

Property ID: 12

Property Name: ALLISON UNIT | 12 | 53186B-1 Table Name: K:\ARIES\RR98PDP\TEST.DBF

Allison Unit #12M

Dakota Offset

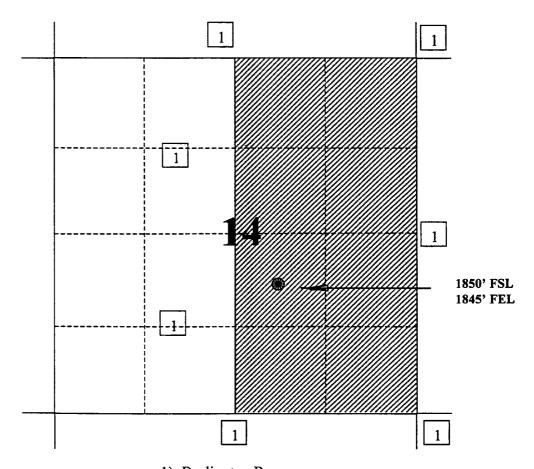
DATE	M SIWHP
07/24/58	2658.0
07/29/59	2177.0
02/22/60	1550.0
07/21/61	1401.0
12/26/61 04/25/62	1604.0 1521.0
05/06/63	1674.0
04/22/64	1620.0
05/03/65	1577.0
08/18/66	1497.0
03/06/67	1494.0
08/15/68	1349.0
04/16/69	1147.0
11/09/70 07/19/71	1249.0 1307.0
04/04/72	1155.0
08/10/72	1162.0
06/18/73	803.0
04/29/75	1171.0
08/08/77	1025.0
06/04/79	936.0
05/15/81 04/25/83	735.0
05/02/85	726.0 724.0
08/15/88	825.0
04/22/90	661.0
03/29/92	583.0
06/16/94	581.0

BURLINGTON RESOURCES OIL AND GAS COMPANY

Allison Unit #12M

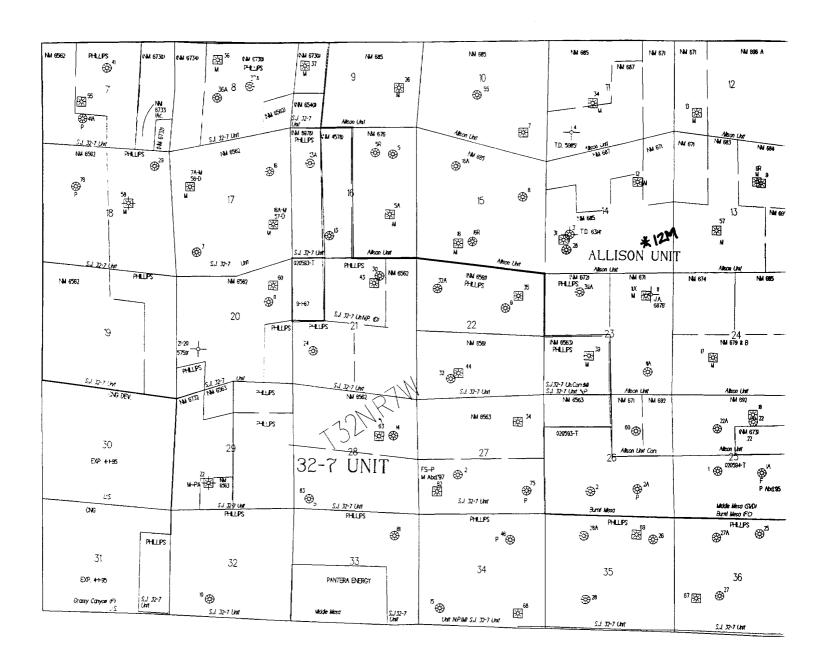
OFFSET OPERATOR/OWNER PLAT Mesaverde / Dakota Formations Commingle Well

Township 32 North, Range 7 West



1) Burlington Resources

Allison Unit #12M Blanco Mesaverde/Basin Dakota 32N-7W-14P



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. 10743 Order No. R-9918

APPLICATION OF MERIDIAN OIL INC.
FOR DOWNHOLE COMMINGLING AND FOR
AN ADMINISTRATIVE DOWNHOLE COMMINGLING
PROCEDURE WITHIN THE ALLISON UNIT
AREA, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on June 17, 1993, at Santa Fe, New Mexico, before Examiner David R. Catanach.

NOW, on this 6th day of July, 1993, 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, Meridian Oil Inc., seeks approval to commingle gas production from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison Unit Well No. 9R located 1720 feet from the North line and 1655 feet from the East line (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (3) The applicant further seeks the adoption of an administrative procedure for authorizing the downhole commingling of Blanco-Mesaverde and Basin-Dakota Pooi production within certain existing and subsequently drilled wells in its Allison Unit Area, San Juan County, New Mexico, without additional notice to each affected interest owner within the Unit Area.

- (4) The Allison Unit Well No. 9R is to be drilled as a replacement weil for the Allison Unit Well No. 9 which is located 1765 feet from the North line and 1500 feet from the East line (Unit G) of Section 13 and which is currently completed in and producing from the Basin-Dakota Pool.
- (5) The Allison Unit Well No. 9 was drilled in 1955 and has cumulatively recovered some 4.4 BCF of gas from the Basin-Dakota Pool.
- (6) Due to the age and mechanical condition of the Allison Unit Well No. 9, the applicant has estimated that it will not recover some 1.7 BCF of gas in the Basin-Dakota Pool underlying the E/2 of Section 13.
- (7) Applicant's testimony indicates that due to economics, the Allison Unit Well No. 9R cannot be drilled solely to recover gas reserves in the Basin-Dakota Pool.
- (8) The applicant expects to encounter marginal production only from the Blanco-Mesaverde Pool.
- (9) The proposed downhole commingling is necessary in order for the applicant to economically recover Basin-Dakota and Blanco-Mesaverde Pool reserves underlying the E/2 of Section 13.
- (10) The Allison Unit is a Federal exploratory unit initially comprising some 11,705 acres in New Mexico and some 2,069 acres in Colorado. Within New Mexico, the unit comprises portions of Township 32 North, Ranges 6 and 7 West, NMPM, San Juan County. The unit was formed in 1950 and is currently operated by Meridian Oil Inc.
- (11) The evidence and testimony presented indicates that the Basin-Dakota and Blanco-Mesaverde Pools have both been substantially developed within the Allison Unit.
- (12) The applicant has identified numerous Mesaverde and Dakota well locations within the Allison Unit which by virtue of marginal gas reserves and resulting poor economics cannot be economically drilled and produced as stand alone units.
- (13) The current well economics and projected Dakota and Mcsaverde gas reserves underlying these respective tracts virtually assure that these wells must be downhole commingled in order to meet the economic criteria for drilling.
- (14) The applicant expects initial producing rates from both the Mesaverde and Dakota formations to be fairly marginal in nature.

- (15) The applicant further demonstrated through its evidence and testimony that within the wells it proposes or will propose to commingle within the Unit Area:
 - a) there will be no crossflow between the two commingied pools;
 - b) neither commingled zone exposes the other to damage by produced liquids;
 - c) the fluids from each zone are compatible with the other;
 - d) the bottomhole pressure of the lower pressure zone should not be less than 50 percent of the bottomhole pressure of the higher pressure zone adjusted to a common datum; and,
 - e) the value of the commingled production is not less than the sum of the values of the individual production.
- (16) The Dakota and Mesaverde Participating Areas within the Allison Unit are not common.
- (17) By virtue of different Participating Areas, the interest ownership between the Dakota and Mesaverde formations within any given wellbore is not common.
- (18) Applicant's Exhibit No. 2 in this case is a list of three hundred and fifty four (354) interest owners in the Dakota and Mesaverde Participating Areas within the Allison Unit. All such interest owners were notified of the application in this case.
- (19) Rule No. 303(C) of the Division Rules and Regulations provides tha administrative approval for downhole commingling may be granted provided that the interest ownership, including working, royalty and overriding royalty interest, is common among the commingled zones.
- (20) Applicant's proposed administrative procedure would provide for Division approval to downhole commingle wells in the Allison Unit Area without hearing, and without the requirement that each interest owner in the Dakota and Mesaverda Participating Areas be notified of such commingling.
- (21) The downhole commingling of wells within the Allison Unit Area will benefit working, royalty and overriding royalty interest owners. In addition, the downhole commingling of wells within the Allison Unit Area should not violate the correlative rights of any interest owner.

- (22) evidence in this case indicates that. to each interest owner within the Dakota an Assaverde Participating Areas of subsequent downhole comminglings within the Allison Unit is unnecessary and is an excessive burden on the applicant.
- (23) No interest owner and/or offset operator appeared at the hearing in opposition to the application.
- (24) An administrative procedure should be established within the Allison Unit for obtaining approval for subsequently downhole commingled wells without notice to Unit interest owners and hearing, provided however that, all provisions contained within Rule No. 303(C) of the Division Rules and Regulations, with the exception of Part 1 (b)(v), are fully complied with.
- (25) The proposed administrative procedure for obtaining approval for downhole commingling will allow the applicant the opportunity to recover additional gas reserves from the Allison Unit Area which may otherwise not be recovered, thereby preventing waste, and will not violate correlative rights.
- (26) In the interest of prevention of waste and protection of correlative rights, the proposed downhole commingling within the Allison Unit Well No. 9R should be approved.
- (27) The applicant should consult with the supervisor of the Aztec District Office of the Division subsequent to the completion of the subject well in order to determine a proper allocation of production.
- (28) The operator should immediately notify the supervisor of the Aztec district office of the Division any time the subject well has been shut-in for seven consecutive days and shall concurrently present, to the Division, a plan for remedial action.

IT IS THEREFORE ORDERED THAT:

- (1) The applicant, Meridian Oil Inc., is hereby authorized to commingle gas production from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison Unit Well No. 9R located 1720 feet from the North line and 1655 feet from the East line (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (2) The applicant shall consult with the supervisor of the Aztec district office of the Division subsequent to the completion of the subject well in order to determine a proper allocation of production.

- (3) The operator shall immediately notify the supervisor of the Aztec district office of the Division any time the subject well has been shut-in for seven consecutive days and shall concurrently present, to the Division, a plan for remedial action.
- (4) An administrative procedure for obtaining approval to downhole commingle wells within the Allison Unit, located in portions of Township 32 North, Ranges 6 and 7 West, NMPM, San Juan County, New Mexico, is hereby established.
- (5) In order to obtain Division authorization to downhole commingle wells within the Allison Unit, the applicant shall file an application with the Santa Fe and Aztec Offices of the Division. Such application shall contain all of 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 Dakota and Mesaverde Participating Areas in the Allison Unit of such proposed commingling. In addition, the application shall contain evidence that all offset operators and the United States Bureau of Land Management (BLM) have been notified of the proposed commingling.
- (6) Jurisdiction is hereby 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

SEAL