DISTRICT I

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

State of New Mexico Energy, Minerals and Natural Resources Department

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

DISTRICT II

OIL CONSERVATION DIVISION

APPROVAL PROCESS:

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

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

X Administrative ___Hearing **EXISTING WELLBORE**

1000 Rio Brazos Rd, Aztec, NM 87410-1693

APPLICATION FOR DOWNHOLE COMMINGLING

__YES __x_ NO

Burlington Resources Oil & Gas	Company PO	Box 4289, Farmington, NM 8749	9
Operator Allison Unit		24-32N-07W	San Juan
.0250	Well No. Uni	it Ltr Sec - Twp - Rge	County
OGRID NO14538 Property Code	6784 API NO30-045		ng Unit Lease Types: (check 1 or more), State, (and/or) Fee _x
The following facts are submitted in support of downhole commingling: 1. Pool Name and Pool Code	Upper Zone Blanco Mesaverde - 72319	Intermediate Zone	Lower Zone Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	will be supplied upon completio	- DECEIVED	will be supplied upon completion
3. Type of production (Oil or Gas)	gas	JUN 2 4 1998	gas
4. Method of Production (Flowing or Artificial Lift)	flowing	OIL CON. DIV.	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing:	(Current) a. 526 psi (see attachment)	a. DISI. 3	a. 996 psi (see attachment)
Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1208 psi (see attachment)	b.	b. 3424 psi (see attachment)
6. Oil Gravity (API) or Gas BTÜ Content	BTU 982		BTU 949
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 Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
* 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 Formula -% for each zone (total of %'s to equal 100%)	Oil: Gas: % will be supplied upon completion	Oil: Gas: %	Oil: Gas: % will be supplied upon completion
O. Are all working, overriding, and rough foot, have all working, overriding Have all offset operators been given. Will cross-flow occur? _x very production be recovered, and will constant all constant all constant all constant all constant all the value of production be decovered.	oyalty interests identical in all cog, and royalty interests been not yen written notice of the propose Yes No If yes, are fluids old the allocation formula be reliable mmingled zones compatible with creased by commingling?	ified by cortified mail?	_Yes _xNo _Yes _xNo _Yes _xNo _YesNo be damaged, will any cross-flowe ch explanation) nation)
5. NMOCD Reference Cases for Rule			
		acing unit and acreage dedication. If not available, attach explanation.) Iction rates and supporting data. Prests for uncommon interest cases. It to support commingling.	
hereby certify that the informat	0 ,	elete to the best of my knowledg	_
TYPE OR PRINT NAME Sean V			<i>J</i> 0-23- <u>78</u>

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District I PO Box 1980. Hoobs, NM 88241-1980

District II PO Drawer CD. 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

Revised February 2:

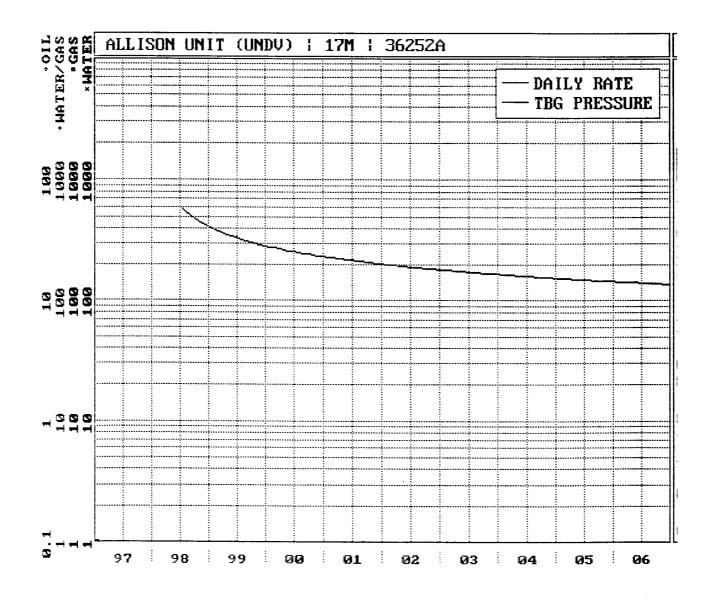
Instructions o
Submit to Appropriate District
State Lease - 4
Fee Lease - 3

AMENDED REE

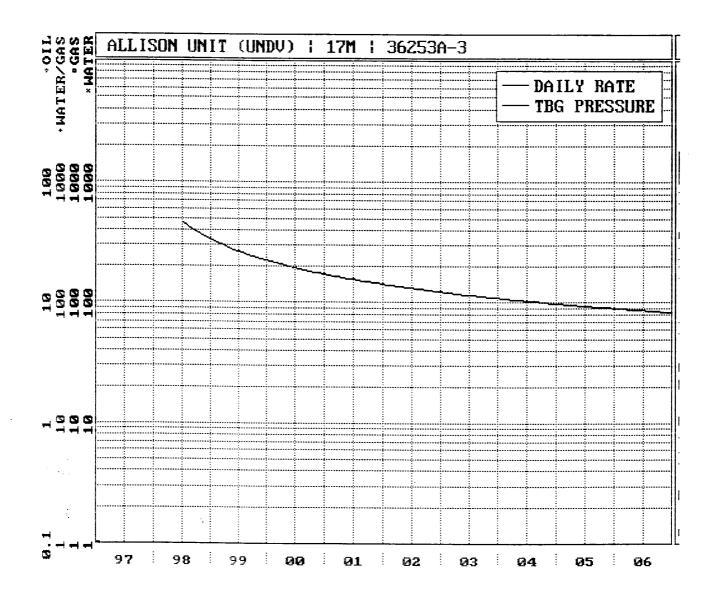
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Allison Unit #17M Expected Production Curve Blanco Mesaverde



Allison Unit #17M Expected Production Curve Basin Dakota



Allison Unit #17M

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>				
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) 0.587 C 0.74 0.74 0.74 0.74 0.74 0.75 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	GAS GRAVITY COND. OR MISC. (C/M) %N2 %CO2 4.66 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 995.8				
MV-Original	<u>DK-Original</u>				
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Page No.: 1

Print Time: Wed Feb 04 13:35:15 1998 Property ID: 2399

Property Name: ALLISON UNIT | 11A | 49921A-1

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

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06/02/81	644.0
05/18/82	583.0
07/02/84	574.0
03/18/86	545.0
09/31/89	493.0
09/31/89	493.0
09/31/89	493.0
02/14/91	520.0
06/08/91	532.0
07/05/93	462.0-CUVRENT

Allison Unit #17m mesaverde Offset

Page No.: 1 Print Time: Wed Feb 04 13:32:25 1998 Property ID: 28 Property Name: ALLISON UNIT | 9 | 49128A-1 Table Name: K:\ARIES\RR98PDP\TEST.DBF . Allison Unit + 17m
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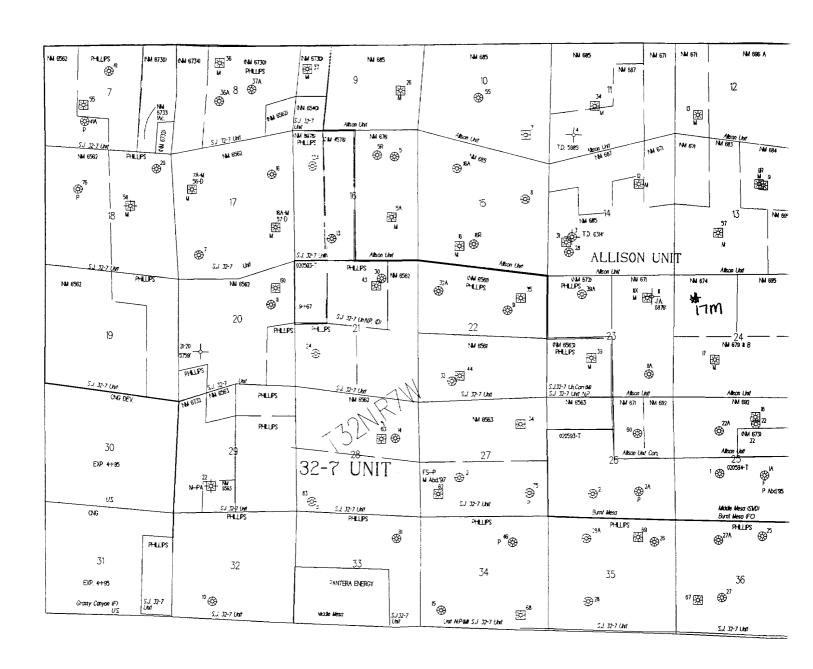
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Allison Unit #17M Blanco Mesaverde/ Basin Dakota 32N-7W-24D

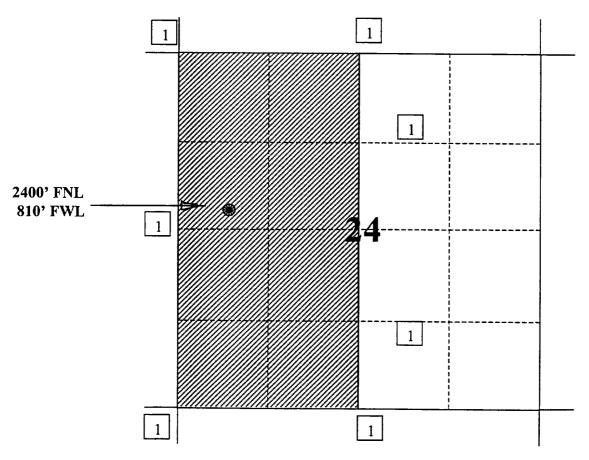


BURLINGTON RESOURCES OIL AND GAS COMPANY

Allison Unit #17M

OFFSET OPERATOR/OWNER PLAT Mesaverde / Dakota Formations Commingle Well

Township 32 North, Range 7 West



1) Burlington Resources

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, Nev Mexico, before Examiner David R. Catanach.

NOW, on this 6th day of July, 1993, the Division Director, having considere the testimony, the record, and the recommendations of the Examiner, and being full 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 gaproduction from the Blanco-Mesaverde and Basin-Dakota Pools within the Allison Un Well No. 9R located 1720 feet from the North line and 1655 feet from the East lir (Unit G) of Section 13, Township 32 North, Range 7 West, NMPM, San Juan Count New Mexico.
- (3) The applicant further seeks the adoption of an administrative procedure for authorizing the downhole commingling of Blanco-Mesaverde and Basin-Dakota Pox 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 owns within the Unit Area.

- (4) The Allison Unit Well No. 9R is to be drilled as a replacement well 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 Bianco-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 weils it proposes or will propose to commingle within the Unit Area:
 - a) there will be no crossflow between the two commingled 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 Divisio: approval to downhole commingle wells in the Allison Unit Area without hearing, and without the requirement that each interest owner in the Dakota and Mesaverd: 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