AZTEC DISTRICT OFFICE
1000 RIO SRAZDE ROAD
AZTEC NM 87419
(505) 334-6179 FAX: (505) 334-6170
http://www.rd.signin.nm.ue/cod/District HV3distric.htm

GARY E. JOHNSON Governor

Jennifer A. Salisbury
Cabinet Secretary

December 18, 1998

Ms. Kay Maddox Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500

Re: San Juan 28-7 Unit # 113M, O-18-27N-07W, API# 30-039-25886, DHC

Dear Ms Maddox:

Your recommended allocation of commingled production for the referenced well is hereby accepted as follows:

	Gas	Oil
Blanco Mesaverde	60%	83%
Basin Dakota	40%	17%

Yours truly,

Ernie Busch

District Geologist/Deputy O&G Inspector

EB/mk

cc:

Jim Lovato-Farmington BLM

David Catanach-NMOCD Santa Fe

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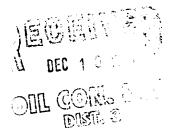
Mid-Continent Region Exploration/Production

December 8, 1998

Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

Mr. Frank Chavez Oil Conservation Division 1000 Ric Brazos Rd Aztec, New Mexico 87410

RE: Allocation For Downhole Commingling Blanco Mesaverde (72319) Basin Dakota (71599) San Juan 28-7 Unit Well # 113M API # 30-039-25886 Unit O, Section 18, T-27-N, R-7-W Rio Arriba County, NM



Dear Mr. Chavez,

The subject well was approved for downhole commingling by Administrative Order # DHC 2038 prior to being completed. This order provided for the allocation to be submitted and approved by the District supervisor of the Aztec office.

Extensive historical data and modeling of early time profiles from these two pools have shown that once a stabilized flow rate had been established in both of them, they exhibit essentially identical decline patterns and rates. Therefore, it is valid and prudently accurate to establish commingling allocation percentages in early time stabilized rates in newly drilled wells where both the Mesaverde and Dakota are sequentially completed and to expect these percentages to be reasonably accurate for the life of the well.

The well was initially completed and fracture stimulated in the Mesaverde and Dakota. Subject well was cleaned out and tested the Mesaverde on November 30, 1998, and the Dakota, December 2, 1998. The Mesaverde and Dakota 12-hour tests resulted in the following submitted data.

The stabilized gas and associated oil rates and the resulting percentage allocations for both completions are shown below:

	OIL RATE BOPD	STABILIZED GAS RATES		OIL	GAS	WATER
MV	5	594 MCFD	15 BWPD	83%	60%	75%
DK	1	396 MCFD	5 BWPD	17%	40%	25%

If there are any further questions regarding this request, please contact me at (915) 686-5798. Thank you.

Sincerely,

Kay Maddox - Regulatory Agent, Conoco, Inc.

cc: BLM-Farmington

