

Mid-Continent Region Exploration/Production

April 16, 1998

Mr. David Catanach New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87504-2088

Re: Application for Downhole Commingling Jackson #2E API # 30-045-24931 Section 33, T-29-N, R-9-W, B San Juan County, New Mexico

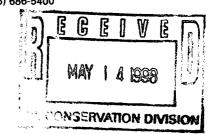
Dear Mr. Catanach,

Reference is made to your letter dated March 20, 1998 (see attached) requesting additional information in support of our application to downhole commingle the subject well. When our application dated February 16, 1998, was prepared, we did not have access to all well records and were unaware that Amoco's Chacra/Dakota commingle was not only approved, but the work was completed in May, 1996. After further review of well records and the most recent production data, we feel it appropriate to modify baseline production as attached, but we still feel that the fixed allocation between the Chacra and Dakota should be changed. The attached well history details reason for the change in allocation.

If there are any additional questions concerning this application please call me at (915) 686-5798.

Sincerely yours,

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



Brief Well History

The well was dually completed in the Chacra and Dakota zones in June, 1981 and first produced November, 1981. The Chacra zone had 1-1/4" tubing landed at 2687' (569' above the top perf). The Dakota was produced (2-3/8" tubing) from under a production packer at 6650' (16' above top perf). While this original wellbore configuration was far less than ideal for unloading liquids from the wellbore, the Chacra was less affected since it produces essentially liquid free. However, the Dakota produces at a high liquid ratio (0.022 bbl/MCF cumulative oil yield) and has been plagued by loading problems, particularly since 1989.

Inspection of the attached production curves shows that production was most stable from 1984-1989. During this time, production from the two zones was approximately equal (50% Chacra and 50% Dakota). After 1989, the Chacra produced consistently while Dakota production was very erratic, likely due to liquid loading.

Packer leakage test records indicate that sometime between 5/92 and 5/96, communication developed between the two zones. Production records indicate that the packer/tubing leak developed in 1994 as follows:

- 1) Prior to 10/94, the Chacra zone produced no oil (cumulative oil yield 0.000 bbl/mcf from 1981-10/94).
- 2) From 10/94 to 4/96 reported Chacra oil yield was 0.006 bbl/mcf, a significant increase.
- 3) Early in 1994, production from the Dakota dropped rapidly.

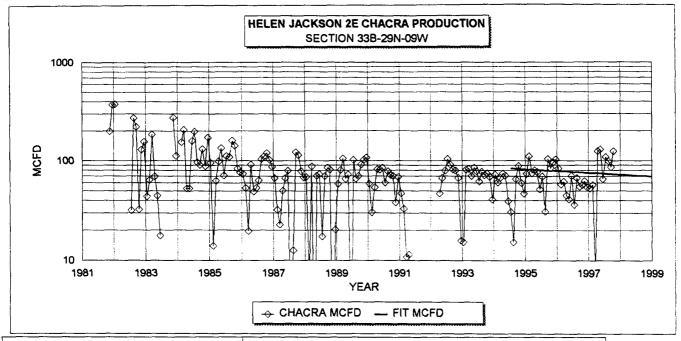
To correct the packer leakage test failure, Amoco sought and was granted approval to downhole commingle the well (Administrative Order DHC-1208 approved 4/4/96). Production was allocated based on a recent well test with the majority of the production allocated to the Chacra (57-43% split for oil and 63-37% split for gas). While Amoco followed the rules by allocating production based on a well test less than 30 days old, the test is suspect since communication between the two zones existed at the time of the test.

Since the production allocation for DHC-1208 was based on suspect test data, we consider it more appropriate to use the earlier production history of the well to allocate production. Certainly no oil production should be allocated to the Chacra since the zone yielded no oil prior to communication with the Dakota and offset Chacra wells also produce no oil. We recommend that gas allocation be based on the data from 1984-1989, when production from both zones was relatively stable. The following allocation factors are obtained from this data:

Otero Chacra Pool Basin Dakota Pool Oil 0% Oil 100%

Gas 50%

Gas 50%



CHACRA HISTORICAL DATA:

1ST PROD: 11/81

0.39 MBO

OIL CUM: GAS CUM:

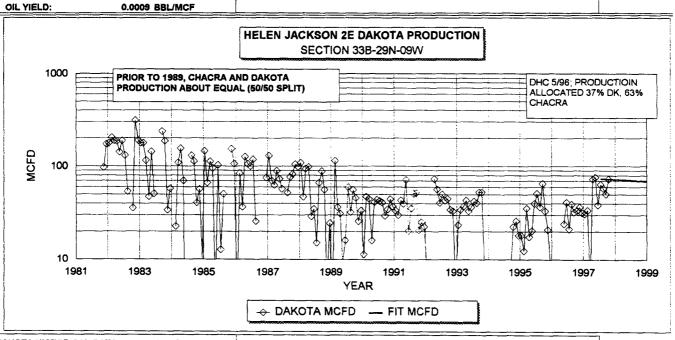
421.0 MMCF

CHACRA PROJECTED DATA

1/1/98 QI: DECLINE RATE: 4.0

73 MCFD

4.0% (EXPONENTIAL)



DAKOTA HISTORICAL DATA 1ST PROD: 11/81 OIL CUM: 7.1 MBO GAS CUM: 318.9 MMCF OIL YIELD: 0.0222 BBL/MCF FIXED COMMINGLE ALLOCATION FACTORS: GAS OIL CHACRA 50% 0% DAKOTA 50% 100%

DAKOTA PROJECTED DATA

1/1/**9**8 Qi:

73 MCFD

DECLINE RATE:

4.0% (EXPONENTIAL)

GAS ALLOCATION BASED ON PROJECTED 1997 RATES

OIL ALLOCATION BASED ON WEIGHTED CUM OIL YIELDS

NOTE: ALL PRODUCTION DATA FROM DWIGHTS ENERGYDATA

HELEN JACKSON 2E 33B-29N-09W

CHACRA AND DAKOTA FORECAST FOR SUBTRACTION COMMINGLE WITH MESAVERDE

(6-12/98 AVG)

	CHACRA	DAKOTA	TOTAL	CHACRA	DAKOTA
YEAR	MCFD	MCFD	MCFD	OIL; BOPD	OIL; BOPD
1998	71	71	143	0.00	1.58
1999	70	70	140	0.00	1.55
2000	67	67	134	0.00	1.49
2001	64	64	129	0.00	1.43
2002	62	62	124	0.00	1.37
2003	59	59	119	0.00	1.31
2004	57	57	114	0.00	1.26
2005	55	55	109	0.00	1.21
2006	52	52	105	0.00	1.16
2007	50	50	101	0.00	1.12
2008	48	48	97	0.00	1.07
2009	46	46	93	0.00	1.03
2010	45	45	89	0.00	0.99
2011	43	43	86	0.00	0.95
2012	41	41	82	0.00	0.91
2013	39	39	79	0.00	0.87
2014	38	38	76	0.00	0.84
2015	36	36	73	0.00	0.81
2016	35	35	70	0.00	0.77
2017	33	33	67	0.00	0.74
2018	32	32	64	0.00	0.71
2019	31	31	62	0.00	0.68
2020	30	30	59	0.00	0.66
2021	28	28	57	0.00	0.63
2022	27	27	55	0.00	0.61
2023	26	26	52	0.00	0.58
2024	25	25	50	0.00	0.56
2025	24	24	48	0.00	0.54
2026	23	23	46	0.00	0.51
2027	22	22	45	0.00	0.49
2028	21	21	43	0.00	0.47
2029	21	21	41	0.00	0.45
2030	20	20	39	0.00	0.44
2031	19	19	38	0.00	0.42

OATE IN 2/19/98 SUSPENSE 3/11/98 ENGINEER DC LOGGED BY W TYPE D#C

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

			- Engineering Bureau -	•		
		ADMINISTRATIV	E APPLICATI	ON COVEF	RSHEET	
	THIS COVERSHI	EET IS MANDATORY FOR ALL ADMIN	ISTRATIVE APPLICATIONS FO	R EXCEPTIONS TO DIVI	SION RULES AND REGULA	rions
Applicatio	[PC-F	wnhole Commingling] [C Pool Commingling] [OLS [WFX-Waterflood Expa]	Drilling] [SD-Simuli TB-Lease Comming - Off-Lease Storag nsion] [PMX-Pressu	aneous Dedicat gling] [PLC-Pool e] [OLM-Off-Lea re Maintenance	tion] I/Lease Commingl ase Measurement] Expansion]	
[1]	TYPE OF AP [A]	PLICATION - Check Location - Spacing U NSL NSP		rilling [] [] [] D	FEB 9 1998	
	Check [B]	One Only for [B] and Commingling - Stora ☑ DHC ☐ CTB	~ -		OLM	No.
	[C]	Injection - Disposal - □ w F X □ PMX		- Enhanced Oil	l Recovery	
[2]	NOTIFICAT [A]	ION REQUIRED TO Working, Royalty				pply
	[B]	☑ Offset Operators,	Leaseholders or Su	ırface Owner		
	[C]	☐ Application is One	e Which Requires	Published Lega	ıl Notice	
	[D]	☐ Notification and/o U.S. Bureau of Land Man.	r Concurrent Appr agement - Commissioner of I	•		
	[E]	☐ For all of the above	e, Proof of Notific	ation or Public	ation is Attached	l, and/or,
	[F]	☐ Waivers are Attac	hed			
[3]	INFORMAT	TION / DATA SUBM	ITTED IS COMP	LETE - Statem	nent of Understa	nding
and Reg adminis that all	gulations of the strative appro- interest (WI,	I, or personnel under new Oil Conservation Down val is accurate and control RI, ORRI) is commonto have the application	vivision. Further, I nplete to the best o I understand that	assert that the a f my knowledg any omission o	attached applicat ge and where app of data, informati	ion for licable, verify
		Note: Statement must	be completed by an individua	al with supervisory cap	acity.	
Print or T	Kay Maddox ype Name	Nay Signature	Maddex	Regi	ulatory Agent	2/13/97 Date



Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

February 16, 1998

Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87504-2088

RE: Application To Downhole Commingle
Jackson #2E Section 33, T-29-N, R-9-W, B
API # 30-045-24931
Otero Chacra (82329), Blanco Mesaverde (72319),
Basin Dakota (71599)
San Juan County, New Mexico

Dear Sir.

Please find enclosed what we are calling an amended C-107A. Amoco Production Co. Filed for and received approval to downhole commingle the Chacra & Dakota, Order # DHC-1208 (see attached). Conoco, Inc. Has recently purchased this well and would like to downhole commingle the Mesaverde with the Chacra & Dakota. Conoco believes that the fixed percentage allocations that were granted to Amoco in the Chacra will only cause discrepancies. This belief is based on the production data submitted with the enclosed C-107A application. Therefore, we would like to amend DHC Order #1208 to the percentages stated in our application.

If you have any additional questions concerning this application please call me @ (915) 686-5798. Thank you very much.

Sincerely,

Kay Maddox Boguleton, Ago

Regulatory Agent

Waddex

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

CORRECTED ADMINISTRATIVE ORDER DIIC-1208

Amoco Production Company P.O. Box 800 Denver, Colorado 80201-0800

Attention: Ms. Pamela Staley

Helen Jackson Well No.2E Unit B, Section 33, Township 29 North, Range 9 West, NMPM, San Juan County, New Mexico. Otero Chacra (Gas - 82329) and Basin Dakota (Prorated Gas - 71599) Pools

Dear Ms. Staley:

Reference is made to your recent application for an exception to Rule 303.A. of the Division Rules and Regulations to permit the above described well to commingle production from the subject pools in the wellbore.

It appearing that the subject well qualifies for approval for such exception pursuant to the provisions of Rule 303.C., and that reservoir damage or waste will not result from such downhole commingling, and correlative rights will not be violated thereby, you are hereby authorized to commingle the production as described above and any Division Order which authorized the dual completion and required separation of the zones is hereby placed in abeyance.

The maximum amount of gas which may be produced daily from the well shall be determined by Division Rules and Regulations or by the gas allowable for each respective prorated pool as printed in the Division's San Juan Basin Gas Proration Schedule.

Assignment of allowable to the well and allocation of production from the well shall be on the following basis:

Otero Chacra Pool	Oil 57%	Gas 63%
Basin Dakota Pool	Oil 43%	Gas 37%

REMARKS: The operator shall notify the Aztec District Office of the Division upon implementation of the commingling process.

Pursuant to Rule 303.H., the commingling authority granted herein may be rescinded by the Division Director if, in his opinion, conservation is not being best served by such commingling.

Approved at Santa Fe, New Mexico on this 4th day of April, 1996.

STATE OF NEW MEXICO

(

OIL CONSERVATION DIVISION

WILLIAM J. LEMAY

Director

SEAL

WJL/BES

cc: Oil Conservation Division - Aztec

Bureau of Land Management - Farmington

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, Now Mexico 87505 (505) 827-7131

ADMINISTRATIVE ORDER DIIC-1208

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ited States Department of ti Interior

BUREAU OF LAND MANAGEMENT

Farmington District Office 1235 La Plata Highway Farmington, New Mexico 87401

March 12, 1996

IN REPLY REPER TO: SF-079947 (DH Comm) 3162.3-2 (07327)

Pamela W. Staley Amoco Production Company P.O. Box 800 1670 Broadway Denver, Colorado 80201

Dear Ms. Staley:

We have reviewed your application to commingle production downhole from the Basin Dakota and the Otero Chacra Pools in the following well:

Helen Jackson #2E 1010' FNL, 1660' FEL, Section 33, T-29N, R-9W San Juan County, New Mexico

Production profiles from both formations were analyzed to determine if future allocation based on percentages would be equitable. Both formations have been declining at similar rates for the past year. Your Application and allocation method, are hereby approved as submitted, effective the date that actual commingling of production occurs. Approved allocation factors are:

Formation	Gas	Condensate
Basin Dakota	37%	43%
Otero Chacra	63% ~	57% ~

Under provisions of 43 CFR 3165.3, you may request an Administrative Review of the order(s) described above. Such request, including all supporting documents, must be filed in writing within 20 business days of receipt of this notice and must be filed with the State Director, Bureau of Land Management, P. O. Box 27115, Santa Fe, New Mexico 87502-0115. Such request shall not result in a suspension of the order(s) unless the reviewing official so determines. Procedures governing appeals from instructions, orders or decisions are contained in 43 CFR 3165.4 and 43 CFR 4.400 et seq.

If you have any questions regarding this correspondence, please contact Ray Hager at (505) 599-6366.

Sincerely,

Duane Spencer

Thave m. Down

Team Leader, Petroleum Management

SITRICT II

DISTRICT III

PO Box 1980, Hobbs, NM 88241 1980

811 SouthI First St. Artesia NM 88210 2835

1000 Rio Brazos Rd. Aztec, NM 87410 1693

TYPE OR PRINT NAME Kay Maddox

State of New Mexico Energy, Minerals and Natural Rasources Department Form C-107-A New 3-12-96

OIL CONSERVATION DIVISION

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

Administrative ☐ Hearing

EXISTING WELL ROPE

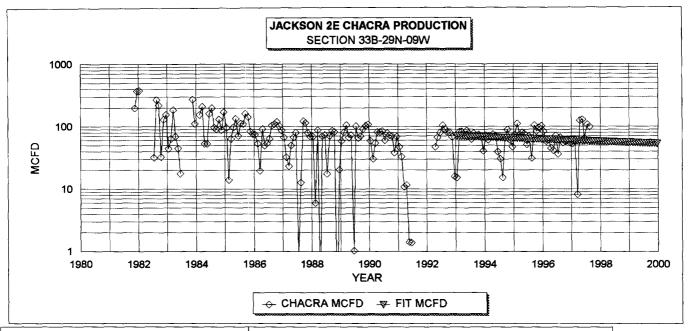
APPLICATION FOR DOWNHOLE COMMINGLING

EXISTING WELLBORE YES NO

Conoco Inc.	10 Addres	Desta Dr. Ste 100W, Midland,	Tx. 79705-4500				
Jackson	2E	Section 33, T-29-N, R-9-W, B	San Juan				
OGRID NO. 005073 Property Code	00	· ·	init Lease Types: (check 1 or more)				
The following facts ate submitted in support of downhole commingilng:	Upper Zone	intermediate Zone	Lower Zone				
Pool Name and Pool Code	Otero Chacra 82329	Blanco Mesaverde 72319	Basin Dakota 71599				
2. TOP and Bottom of Pay Section (Perforations)	3256-3392'	4130-4916'	6666-6832'				
3. Type of production (Oil or Gas)	Gas	Gas	Gas				
4. Method of Production {Flowing or Artificial Lilt}	Flowing	To Flow	Flowing				
5. Bottomhole Pressure Oil Zones - Artilicial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones:	a (Current) 563 b(Original)	a. 475	а. 715 b.				
Estimated Or Measured Original	868	1175	2423				
6. Oil Gravity (°API) or Gas BT Content	1185	1335	1268				
7. Producing or Shut-In?	Producing	To Be Completed	Producing				
Production Marginal? (yes or no)	Yes	Yes	Yes				
If Shut-In give date and oil/gas/ water rates of lsst production	Date Rates	Date Rates:	Date Rates				
Note For new zones with no production history applicant shad be required to attach production estimates and supporting dara If Producing, date and oil/gas/ water rates of recent test (within 60 days)	Est 1/98 Rates 57 MCFD, .05 BOPD, 0 BWPD	Production by Subtraction See Attached table	Est 1/98 Rates 98 MCFD, 1.29 BOPD, 0 BWPD				
Fixed Percentage Allocation Formula -% or each zone	oil: Gas %	eil: Gas %	0 ii:				
9. 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? 11. 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) 12. Are all produced fluids from all commingled zones compatible with each others X Yes No 13. Will the value of production be decreased by commingling? Yes 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). DHC 1208 Chacro DK 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 slotset operators. * Any additional statements, data, or documents required to support commingling.							
I hereby certify that the information		•					
SIGNATURE Tay	y Maddex	TITLE Regulatory Agent	DATE February 13, 1998				

_TELEPHONE NO. (915)

686-5798

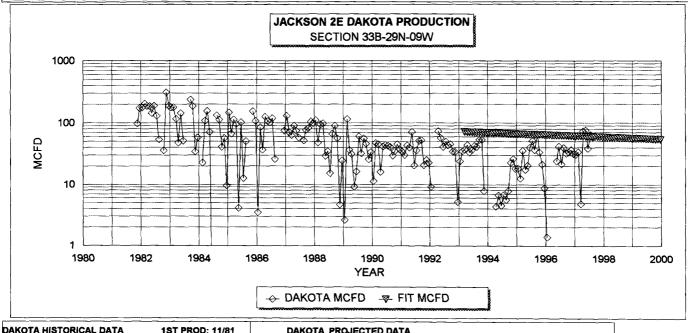


 CHACRA HISTORICAL DATA:
 1ST PROD: 11/81
 CHACRA PROJECTED DATA

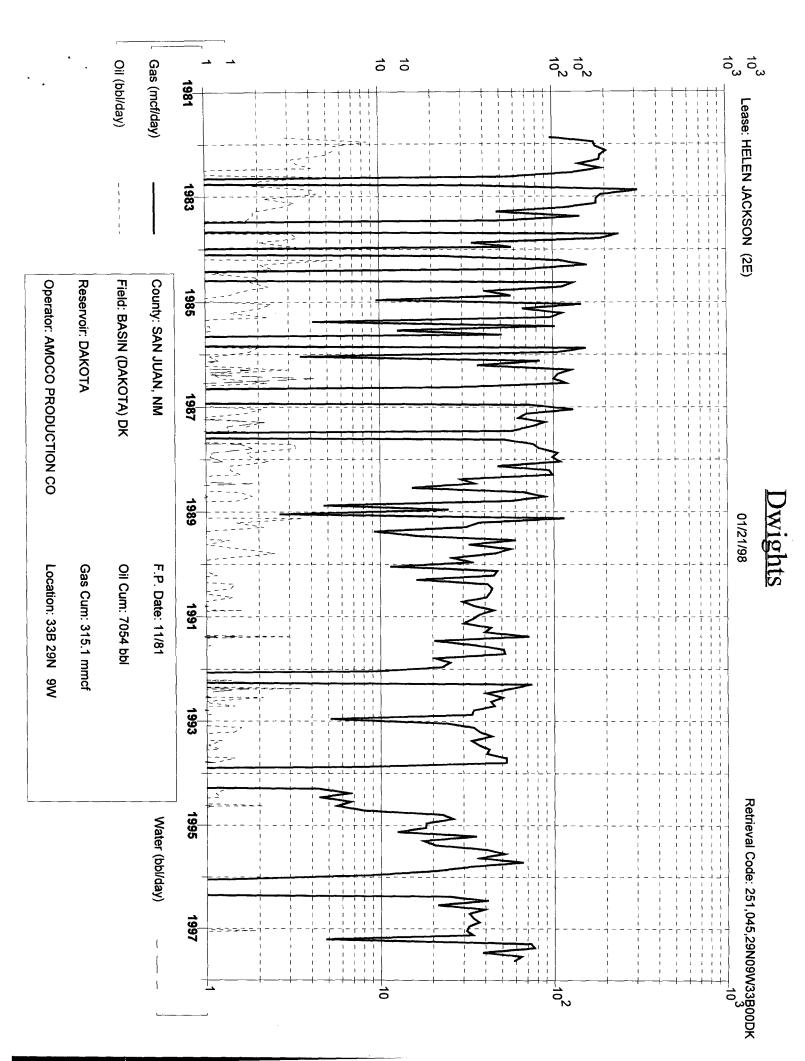
 OIL CUM:
 0.37 MBO
 1/1/98 Qi:
 57 MCFD

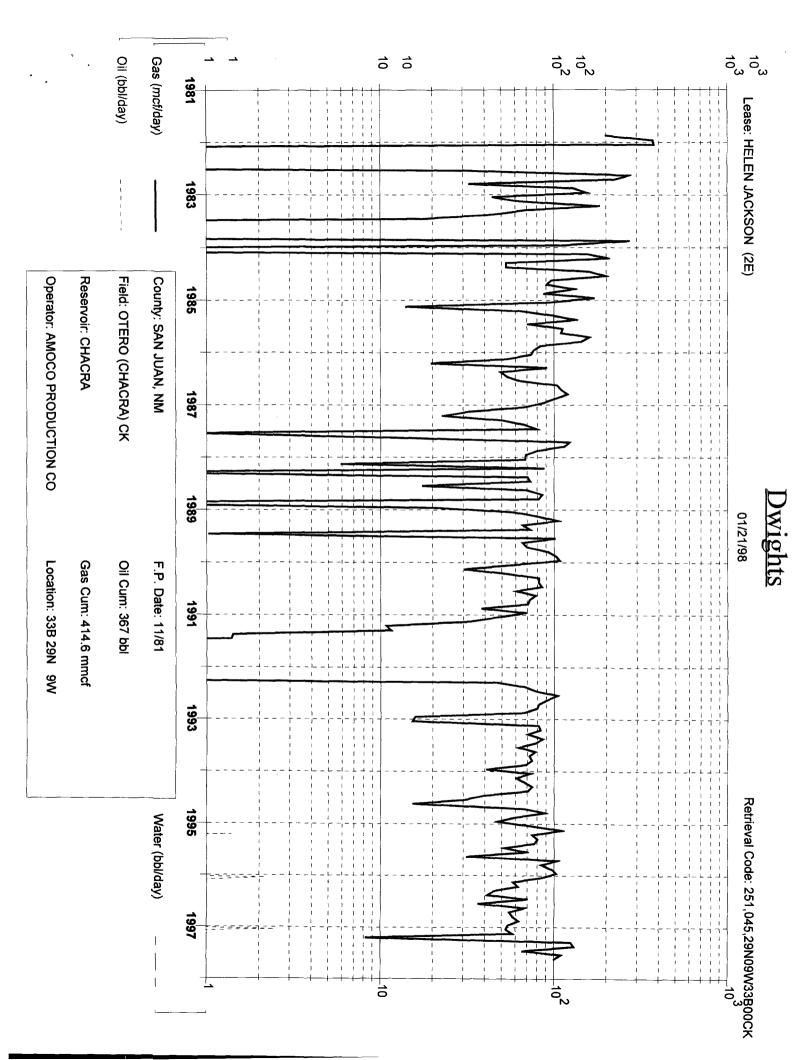
 GAS CUM:
 414.6 MMCF
 DECLINE RATE:
 4.0% (EXPONENTIAL)

 OIL YIELD:
 0.0009 BBL/MCF



DAROTA HISTORICAL DATA	151 PROL	: 11/61	DAKOTA PRO	DECTED DATA
OIL CUM:	7.1 MBO		1/1/98 Qi:	58 MCFD
GAS CUM:	315.1 MMCF		DECLINE RATE:	4.0% (EXPONENTIAL)
OIL YIELD:	0.0224 BBL/MCF			
FIXED COMMINGLE ALLOCA	TION FACTORS:			
	GAS	OIT	GAS ALLOCATION BA	ASED ON PROJECTED 1998 RATES
CHACRA	50%	4%	OIL ALLOCATION BA	SED ON WEIGHTED CUM OIL YIELDS
DAKOTA	50%	96%	NOTE	E: ALL PRODUCTION DATA FROM DWIGHTS ENERGYDATA





Conoco, Inc. 10 Desta Dr Ste 100W Midland, TX 79705

Re: Application to Downhole Commingle C-107A Jackson #2E, Section 33, T-29-N, R-9-W, B San Juan County, New Mexico

Notification Of Offset Operators:

Amoco PO Box 800 Denver, CO 80201

Burlington Resources PO Box 4289 Farmington, NM 87499

West Largo Corp. 6638 W. Ottawa Ave STE 100 Littleton, Co 80123

S&G Interests 811 Dallas STE 1505 Houston, TX 77002

D.J. Simmons PO Box 1469 Farmington, NM 87499

Koch Exploration Co. PO Box 2256 Wichita, KA 67201 District | PO Box 1980, Hobbs. NM 88241-1980

State of New Mexico Energy, Minerals & Natural Resources Department

Revised February 21, 1994 instructions on back

District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410

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

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

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

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AF	Pl Numbe	r		2 Pool C	Pool Code 3 Pool Name					
	045-2493	31		72319	72319 Blanco Mesaverde					
4 Property	Code				5 Propert	-		Ì	6 We	II Number
7 000ID No									#2E	
7 OGRID No.	1	Ca	noco Inc	10 Desta	•		. 70705. <i>4</i> 500	,		902!
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neil L es must be from the outer hormduries of the Sei Ali di Well He. Tenneco Oil Company Jackson ∄ ange County 15:11 Letter 29N San Juan Actual Fostage Location of Well: 1660 line and feet from the <u>North</u> Dedicated Acresper Ground Level Elev. Preducing Formation Dakota/hacra 5902' Dakota/Chacra Actes 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners heen consolidated by communitization, unitization, force-pooling, etc? Il answer is "yes," type of consolidation _ If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.)_ No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. CERTIFICATION I hereby certify that the information comtained herein is true and complete to the Less of my knowledge, and belief. 1660' Production Analyst Tenneco Oil Company Campuny 8/3/81 Date I hereby certify that the well location shown on this plat was platted from field notes of octual surveys made by me or ACCEPTED FOR RECORD under my supervision, and that the same is true and correct to the best of my knowledge and belief. AUG RA 1981 FARMINGTON-BISTRICT Date Surveyed Registered Professional Engineer and/or Land Surveyor Certificate No. € 40 1000 500

OPERATUR

Form C-107 kerised 10-1

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	I	g g	!		4	Сотрату	enneco Oil Co	mpany
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JACKSON 2E: CHACRA AND DAKOTA FORECAST FOR SUBTRACTION COMMINGLE WITH MESAVERDE

33B-29N-09W

	CHACRA	DAKOTA	TOTAL	CHACRA	DAKOTA
YEAR	MCFD	MCFD	MCFD	OIL; BOPD	OIL; BOPD
1998	56	57	114	0.0	1.3
1999	55	56	111	0.0	1.3
2000	53	54	107	0.0	1.2
2001	51	52	103	0.0	1.2
2002	49	50	98	0.0	1.1
2003	47	48	95	0.0	1.1
2004	45	46	91	0.0	1.0
2005	43	44	87	0.0	1.0
2006	41	42	84	0.0	0.9
2007	40	40	80	0.0	0.9
2008	38	39	77	0.0	0.9
2009	37	37	74	0.0	0.8
2010	35	36	71	0.0	0.8
2011	34	34	68	0.0	8.0
2012	32	33	65	0.0	0.7
2013	31	32	63	0.0	0.7
2014	30	30	60	0.0	0.7
2015	29	29	68	0.0	0.7
2016	28	28	56	0.0	0.6
2017	26	27	53	0.0	0.6
2018	25	26	51	0.0	0.6
2019	24	25	49	0.0	0.6
2020	23	24	47	0.0	0.5
2021	22	23	45	0.0	0.5
2022	22	22	44	0.0	0.5
2023	21	21	42	0.0	0.5
2024	20	20	40	0.0	0.5
2025	19	19	39	0.0	0.4
2026	18	19	37	0.0	0.4
2027	18	18	35	0.0	0.4
2028	17	17	34	0.0	0.4
2029	16	16	33	0.0	0.4
2030	16	16	31	0.0	0.4
2031	15	15	30	0.0	0.3