LOGGED

ABOVE THIS LINE FOR DIVISION USE ONLY

### NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1472

<b>ADMINISTRA</b>	TIVE APPLICA	TION CO	VERSHEET
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THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

	THIS COVERSHE	ET 15 MARDATORY FOR ALE ADMINISTRATIVE AFFEIGRATIONS FOR EAGE. HORS TO DIVISION NOTES AND NEGOTIANISTRATIVE AFFEIGRATIONS FOR EAGE.
Applic	[PC-Pc	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [nhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [DIS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [Iffied Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF AI	PPLICATION - Check Those Which Apply for [A]  Location - Spacing Unit - Directional Drilling  NSL NSP DD SD  FEB 2 0 1997
	Check [B]	One Only for [B] and [C]  Commingling - Storage - Measurement  DHC CTB PC CONSERVATION DIVISION  OL CONSERVATION DIVISION
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  ☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR
[2]	NOTIFICAT [A]	TION REQUIRED TO: - Check Those Which Apply, or ☐ Does Not Apply ☐ Working, Royalty or Overriding Royalty Interest Owners
	[B]	☐ Offset Operators, Leaseholders or Surface Owner
	[C]	☐ Application is One Which Requires Published Legal Notice
	[D]	Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E]	☐ For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F]	☐ Waivers are Attached
[3]	INFORMAT	ION / DATA SUBMITTED IS COMPLETE - Statement of Understanding
here	by certify that I	, or personnel under my supervision, have read and complied with all applicable Ru

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

Peggy Bradfield		Segue	Stud p	aild
Drint or Type Nor	~~	<del>/ - / / - /</del>	Cianatura	

Regulatory/Compliance Administrator

2-18-97

Print or Type Name

Signature

Title

Date

### BURLINGTON RESOURCES

SAN JUAN DIVISION February 18, 1997

### SENT FEDERAL EXPRESS

Mr. William LeMay New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Re:

San Juan 29-7 Unit #140

790'FNL, 1480'FWL Section 8, T-29-N, R-7-W, Rio Arriba County, NM

API #30-039-24142

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota in the subject well. This is well was originally drilled as a Dakota; it is intended to add the Mesa Verde and commingle.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas is submitting the following for your approval of this commingling:

- 1. Form C107A Application for Downhole Commingling;
- 2. C-102 plat for each zone showing its spacing unit and acreage dedication;
- 3. Production curve for Dakota for at least one year and expected production curve for Mesa Verde;
- Notification list of offset operators Burlington is the offset operator;
- 5. Shut in wellhead pressure and calculated down hole pressure;
- 6. Nine-section plats for the Dakota and Mesa Verde

Notification of Mesa Verde and Dakota interest owners is covered under Reference Order #R-10697 issued November 8, 1996 attached.

We will consult with the Supervisor of the Aztec District Office of the New Mexico Oil Conservation Division to establish an allocation formula.

Please let me know if you require additional data.

Sincerely.

Peggy Bradfield

Regulatory/Compliance Administrator

Lagy Shaafueld

encs.

xc: Burea

**Bureau of Land Management** 

### <u>DISTRICT I</u>

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

<u>DISTRICT II</u>

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

**Burlington Resources Oil & Gas Company** 

DISTRICT III 1000 Rio Brazos Rd, Aztec, NM 87410-1693 State of New Mexico Energy, Minerals and Natural Resources Department **OIL CONSERVATION DIVISION** 

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

### **APPROVAL PROCESS:**

\_X\_ Administrative \_\_\_Hearing

PO Box 4289, Farmington, NM 87499

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

**EXISTING WELLBORE** 

### APPLICATION FOR DOWNHOLE COMMINGLING

\_x\_YES \_\_\_ NO

Operator	Addre		:- Aib -
San Juan 29-7 Unit	140 C 8-		io Arriba
Lease	Well No. Unit L	tr Sec - Twp - Rge Spacing	County Unit Lease Types: (check 1 or more)
OGRID NO14538 Property C	ode7465 API NO30-039-2	· -	• • • • • • • • • • • • • • • • • • • •
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
Pool Name and     Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
Top and Bottom of Pay Section (Perforations)	will be supplied upon completion		7195-7460'
3. Type of production (Oil or Gas)	gas		gas
Method of Production (Flowing or Artificial Lift)	flowing		flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 681psi (see attachment)	a.	a. 816 psi (see attachment
Gas & Oil - Flowing:  Measured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1228 psi (see attachment)	b.	b. 1603 psi (see attachment)
6. Oil Gravity (°API) or Gas BTU Content	BTU 1174		BTU 1015
7. Producing or Shut-In?	shut in		producing
Production Marginal? (yes or no)	no		yes
* If Shut-In and oil/gas/water rates of last production	Date: n/a Rates:	Date: Rates:	Date: n/a Rates:
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data			
* 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: %
9. If allocation formula is based un attachments with supporting data.  10. Are all working, overriding, and If not, have all working, overriding Have all offset operators been gate.			
<ol> <li>Will cross-flow occur? _x_ Y production be recovered, and v</li> </ol>	es No _lf yes, are fluids com will the allocation formula be relia	patible, will the formations not liblex YesNo(If No, a	be damaged, will any cross-flowe attach explanation)
12. Are all produced fluids from all o			
13. Will the value of production be d 14. If this well is on, or communitize		•	-
<ol> <li>If this well is on, or communitize of Land Management has been n</li> <li>NMOCD Reference Cases for Ru</li> </ol>			
40 ATTAOLIMENTO	to be commingled showing its spa each zone for at least one year, o duction history, estimated produ ation method or formula. offset operators. rking, overriding, and royalty inte nents, data, or documents require		
I hereby certify that the inform	ation above is true and com	plete to the best of my know	ledge and belief.
SIGNATURE Loam Work	TITLE_Produ	iction EngineerDAT	E02-18-97
TYPE OR PRINT NAME _Sean	Woolverton TELEPHO	NE NO. ( 505 ) 326-970(	)

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

### State of New Mexico Energy, Minerals & Natural Resources Department

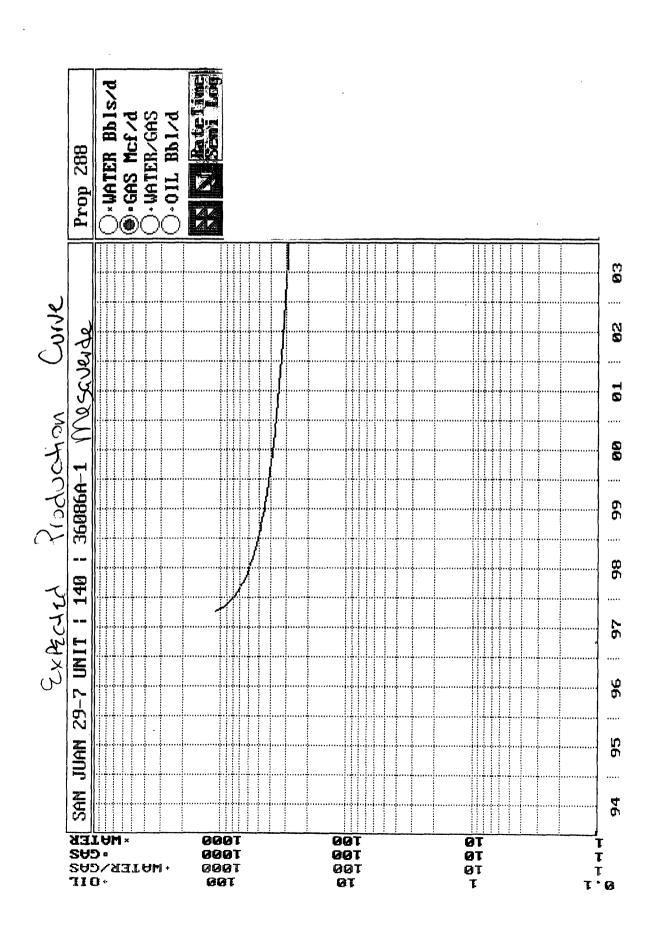
# OIL CONSERVATION DIVISION PO Box 2088

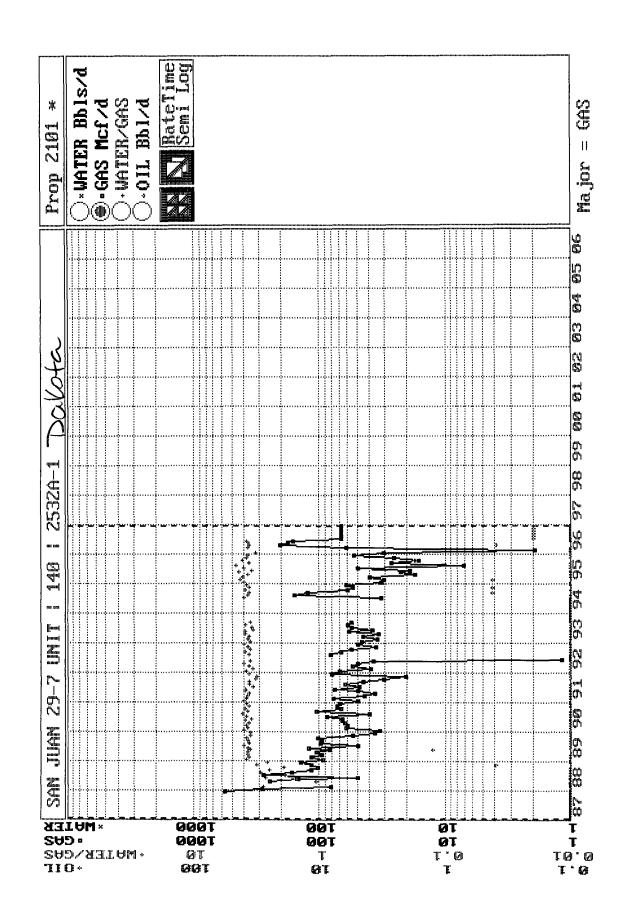
Form C-102 Revised February 21, 1994 Instructions on back

Submit to Appropriate District Office

State Lease - 4 Copies Fee Lease - 3 Copies

### Santa Fe. NM 87504-2088 District IV PO Box 2088, Santa Fe, NM 87504-2088 AMENDED REPORT WELL LOCATION AND ACREAGE DEDICATION PLAT <sup>1</sup> Pool Code <sup>3</sup> Pool Name API Number 30-039-24142 72319/71599 Blanco Mesaverde/Basin Dakota · Well Number Property Code 140 San Juan 29-7 Unit 7465 Operator Name · Elevation 'OGRID No. 6145' BURLINGTON RESOURCES OIL & GAS COMPANY 14538 10 Surface Location Section Township Lot ida Feet from the North/South line Feet from the East/West line Range County UL or lot no. 29-N 8 7-W 790 C North 1480 West R.A. 11 Bottom Hole Location If Different From Surface Township Lot ida Feet from the North/South line Feet from the Section Range East/West tipe UL or lot no. Connty <sup>13</sup> Dedicated Acres W/320 13 Joint or Infill 14 Consolidation Code 15 Order No. W/320NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION 17 OPERATOR CERTIFICATION I hereby certify that the information conti Not resurveyed, prepared true and complete to the best of my incordaige and belief from a plat by Fred B. Kerr, Jr. datted 9-17-85.0 1480' Peggy Bradfield Printed Name Regulatory Administrator Tille 2-7-97 18SURVEYOR CERTIFICATION I hereby certify that the well location was plotted from field notes of actual surveys made by m or under my supervision, and that the same is true and correct to the best of my belief. 2/04/97 Date of Survey WH ME.



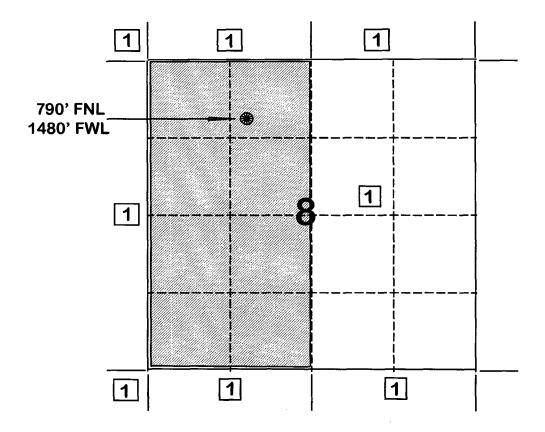


### **BURLINGTON RESOURCES OIL AND GAS COMPANY**

## San Juan 29-7 Unit #140 OFFSET OPERATOR \ OWNER PLAT

### Mesaverde/Dakota Formations Commingle Well

Township 29 North, Range 7 West



1) Burlington Resources Oil and Gas Company Successor to Meridian Oil Inc.

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Page No.: 11 Print Time: Thu Jan 02 14:42:15 1997

Property ID: 2101

Property Name: SAN JUAN 29-7 UNIT | 140 | 2532A-1 Dalota Table Name: K:\ARIES\RR97PDP\TEST.DBF

DATE	CUM_GAS	M SIWHP
01/26/87	0	1361.0 ← original
08/03/88	55967	522.0
10/07/89	100016	767.0
07/31/90	116107	771.0
09/29/92	160623	700.0 corrent

VERSION 1.0 3/13/94

GAS GRAVITY	0.599
COND. OR MISC. (C/M)	C
%N2	0.44
%CO2	1.71
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	7424
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1361
BOTTOMHOLE PRESSURE (PSIA)	1602.9

SAN JUAN 29-7 UNIT #140 DAKOTA - ORIGINAL

VERSION 1.0 3/13/94

GAS GRAVITY	0.599
COND. OR MISC. (C/M)	С
%N2	0.44
%CO2	1.71
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	7424
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	700
BOTTOMHOLE PRESSURE (PSIA)	816.4

SAN JUAN 29-7 UNIT #140 DAKOTA - CURRENT

Page No.: 10

Print Time: Fri Jan 03 13:44:00 1997

Property ID: 10563

Property Name: SAN JUAN 29-7 UNIT | 43 | 69638-1 29-7 ± 140 MV Off SE+
Table Name: K:\ARIES\RR97PDP\TEST.DBF

DATE	CUM_GAS	M SIWHP
06/29/55 07/21/55 10/15/56 10/16/57 03/30/58 03/29/59 09/06/60 10/05/61 03/13/62 07/22/63 02/07/64 02/25/65 08/23/66 03/03/67 03/05/68 05/15/69 03/03/70 03/30/71 06/12/72 07/09/73 08/21/74 04/20/76 05/16/78 07/18/80 05/19/82 09/19/84 09/03/86 10/07/89 07/17/91	0 0 116000 227000 265000 340000 447000 532000 563000 623000 656000 726000 845000 895000 989000 1111000 1192297 1283381 1414494 1533484 1641684 1807885 1994028 2127998 2242564 2332603 2419777 2528403	1058.0 CONGINA 1057.0 797.0 826.0 795.0 772.0 804.0 822.0 714.0 821.0 784.0 771.0 747.0 714.0 662.0 636.0 586.0 489.0 514.0 506.0 507.0 605.0 579.0 592.0 544.0 562.0
07/17/91 08/05/91 06/01/93 01/07/94	2565915 2579672 2630616 2673278	632.0 595.0 552.0 593.0 — Offset

VERSION 1.0 3/13/94

GAS GRAVITY	0.681
COND. OR MISC. (C/M)	C
%N2	0.37
%CO2	0.35
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	5518
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1058
BOTTOMHOLE PRESSURE (PSIA)	1228.3

SAN JUAN 29-7 UNIT #43 MESAVERDE - ORIGINAL

VERSION 1.0 3/13/94

GAS GRAVITY	0.681
COND. OR MISC. (C/M)	С
%N2	0.37
%CO2	0.35
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	5518
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	593
BOTTOMHOLE PRESSURE (PSIA)	680.8

SAN JUAN 29-7 UNIT #43 MESAVERDE - CURRENT

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# 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. 11629 ORDER NO. R-10697

APPLICATION OF BURLINGTON RESOURCES
OIL & GAS COMPANY FOR THE ESTABLISHMENT
OF A DOWNHOLE COMMINGLING "REFERENCE
CASE" FOR ITS SAN JUAN 29-7 UNIT PURSUANT
TO DIVISION RULE 303.E. AND THE ADOPTION
OF SPECIAL ADMINISTRATIVE RULES THEREFOR,
SAN JUAN COUNTY, NEW MEXICO.

### ORDER OF THE DIVISION

### BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on October 17, and November 7, 1996, at Santa Fe, New Mexico, before Examiners David R. Catanach and Michael E. Stogner, respectively.

NOW, on this 8th day of November, 1996, 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, Burlington Resources Oil & Gas Company (Burlington), pursuant to the provisions of Division Rule 303.E., seeks to establish a downhole commingling "reference case" to provide exceptions for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 29-7 Unit, San Juan County, New Mexico.
- (3) Division Rule No. 303.E., amended by Order No. R-10470-A, currently states:

"If sufficient data exists on a lease, pool, formation, geographic area, etc., so as to render it unnecessary to repeatedly provide such data on Form C-107-A, an operator may except any of the various criteria required under Paragraph 303.D. of this rule by establishing a "reference case". The Division, upon its own motion, or by application from an operator, may establish "reference cases" either administratively or by hearing. Upon Division approval of such "reference cases" for specific criteria, subsequent applications to downhole commingle (Form C-107-A) will be required only to cite the Division order number which established such exceptions and shall not be required to submit data for those criteria."

- (4) The applicant is the current operator of the San Juan 29-7 Unit which encompasses some 22,500 acres in Township 29 North, Range 7 West, NMPM, San Juan County, New Mexico.
- (5) Within the San Juan 29-7 Unit, the applicant currently operates fifty-five (55) Basin-Dakota Gas Pool wells, one hundred thirty-one (131) Blanco-Mesaverde Gas Pool wells, thirteen (13) Blanco-Pictured Cliffs and South Blanco-Pictured Cliffs Gas Pool wells, and forty-nine (49) Basin-Fruitland Coal Gas Pool wells.
  - (6) According to its evidence and testimony, Burlington seeks to:
    - a) establish a "reference case" for marginal economic criteria in the Dakota and Pictured Cliffs formations whereby these formations and/or pools may be identified as "marginal" on Form C-107-A's subsequently filed for wells within the San Juan 29-7 Unit. The applicant further proposes that the data provided in the immediate case serve as supplemental data or confirmation that these formations and/or pools should be classified as "marginal";
    - b) establish a "reference case" for pressure criteria in the Dakota and Pictured Cliffs formations whereby the Division may utilize data provided in the immediate case to verify the pressure data provided on Form C-107-A's subsequently filed for wells within the San Juan 29-7 Unit;
    - establish a "reference case" whereby the Division utilizes the data presented in the immediate case to endorse or approve certain methods of allocating production whereby the applicant need not submit additional data or justification when proposing a certain method of allocating production on Form C-107-A's subsequently filed for wells within the San Juan 29-7 Unit; and.

- d) establish a "reference case" or an administrative procedure for authorizing the downhole commingling of existing or future drilled wells within the San Juan 29-7 Unit without additional notice to each affected interest owner as required by Division Rule No. 303.D.
- (7) In support of its request to except marginal economic criteria, the applicant presented geologic and engineering evidence and testimony which indicates that within the San Juan 29-7 Unit:
  - a) the structure and thickness of the Dakota and Pictured Cliffs formations are very consistent;
  - b) the average recoverable Dakota and Pictured Cliffs gas reserves underlying an undeveloped drill block are approximately 245 MMCFG and 76 MMCFG, respectively;
  - c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 218 MCFGD and 238 MCFGD, respectively; and,
  - d) the estimated ultimate gas recoveries and initial producing rates from the Dakota and Pictured Cliffs formations are insufficient to justify drilling stand alone wells and/or dually completed wells to recover such gas reserves.
- (8) The evidence and testimony presented by the applicant indicates that the Dakota and Pictured Cliffs formations within the San Juan 29-7 Unit should be properly classified as "marginal".
- (9) In support of its request to except pressure criteria within the Dakota and Pictured Cliffs formations within the San Juan 29-7 Unit, the applicant presented engineering evidence and testimony which indicates that:
  - a) the average shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations at the time of initial development was approximately 3,209 psi and 1,148 psi, respectively; and,
  - b) the average current shut-in bottomhole pressure within the Dakota and Pictured Cliffs formations is approximately 952 psi and 655 psi, respectively.

- (10) There is sufficient pressure data available within the San Juan 29-7 Unit so as to except pressure criteria as proposed by the applicant.
- (11) The applicant testified that various allocation methods will be utilized for downhole commingled wells within the San Juan 29-7 Unit depending on the circumstances. Some of the methods and circumstances are described as follows:
  - a) the subtraction method will likely be utilized in those instances involving the Basin-Fruitland Coal Gas Pool and in those instances where a zone with a well established decline rate is commingled with a newly completed zone;
  - b) a fixed allocation formula will be utilized in those instances where production history for both zones is available, or in those instances where newly completed zones are tested and stabilized flow rates obtained.
- (12) The allocation methods proposed by the applicant are routinely utilized by industry and approved by the Division and therefore, the proposal to except allocation formulas should be approved.
- (13) In support of its request to establish a "reference case" or administrative procedure for providing notice within the San Juan 29-7 Unit the applicant presented evidence and testimony which indicates that:
  - a) the interest ownership between two zones within a given wellbore in the San Juan 29-7 Unit is generally not common;
  - b) pursuant to Division Rule No. 303.D., applicant is currently required to notify all interest owners within the San Juan 29-7 Unit every time a Form C-107-A is submitted to the Division. There are a considerable number of such interest owners within the unit:
  - c) providing notice to each interest owner within the San Juan 29-7
    Unit of subsequent downhole comminglings is unnecessary and is an excessive burden on the applicant;
  - d) the downhole commingling of wells within the San Juan 29-7 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 29-7 Unit should not violate the correlative rights of any interest owner;

- e) no interest owner appeared at the hearing in opposition to the establishment of a "reference case" or administrative procedure for notice.
- (14) An administrative procedure should be established within the San Juan 29-7 Unit for obtaining approval for subsequent downhole commingled wells without notice to Unit interest owners, provided however that, all other provisions contained within Division Rule No. 303.C. are complied with.
- (15) Approval of the proposed "reference cases" for marginal economic criteria, pressure criteria, allocation formulas and notice will lessen the burden on the applicant insofar as providing the data required pursuant to Division Rule No. 303.D. and Form C-107-A, will provide the applicant a streamlined method for obtaining downhole commingling approvals within the San Juan 29-7 Unit, and will not violate correlative rights.

### IT IS THEREFORE ORDERED THAT:

- (1) The application of Burlington Resources Oil & Gas Company to establish a "reference case" for (a) marginal economic criteria, (b) pressure criteria, (c) allocation formulas and (d) modification of notification rules on a unit-wide basis for downhole commingling of Dakota, Mesaverde, Fruitland Coal and Pictured Cliffs gas production within existing or future drilled wells within the San Juan 29-7 Unit, San Juan County, New Mexico, is hereby approved.
- (2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 29-7 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify the Pictured Cliffs and Dakota pressure information provided, and support or justification for utilizing a given method or formula for allocation of production, provided however, in the event any of the data described above appearing on Form C-107-A appears to be beyond the data range provided in this case, the Division may require the submittal of additional supporting data.
- (3) In order to obtain Division authorization to downhole commingle wells within the San Juan 29-7 Unit, the applicant shall file a Form C-107-A with the Santa Fe and Aztec Offices of the Division. Such application shall contain all 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 San Juan 29-7 Unit of such proposed commingling.

(4) Jurisdiction of this cause is 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