•	CATE IN	2/24/97	SUSPENSE 3/17/97	ENGINEER B_S		TYPE DHC			
ABOVE THIS LINE FOR DIVISION USE ONLY									
		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau -							
		ADMINISTRATIVE APPLICATION COVERSHEET							
				MINISTRATIVE APPLICATIO	S FOR EXCEPTIONS TO DIVISION RU	LES AND REGULATIONS			
	Application Acronyms: [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]								
	[1]	TYPE OF A	PPLICATION - Che	eck Those Which	Apply for [A]				
		[A]	Location - Spacing		Drilling SD FE	B 2 4 1997			
		Chec	k One Only for [B] an	nd [C]	CHL CONSI	RVATION DIV(2133)			
		[B]	Commingling - Sto	-		OLM			
		[C]	Injection - Disposal		se - Enhanced Oil Reco	very ☐ PPR			
	[2]	NOTIFICA [A]			e Which Apply, or 🖵 D Royalty Interest Owners	oes Not Apply			
		[B]	Gifset Operators	s, Leaseholders or	Surface Owner				
		[C]	Application is O	one Which Require	es Published Legal Noti	ce			
		[D]			pproval by BLM or SLC er of Public Lands, State Land Office)			
		[E]	Given Bor all of the abo	ove, Proof of Noti	fication or Publication i	s Attached, and/or,			
		[F]	U Waivers are Atta	ached					

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

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.

\bigcirc –	Note: Statement must be co	mpleted by an individual with supervisory capacity.	
Peggy Bradfield	Cappied	Regulatory/Compliance Administrator	2.20.97
Print or Type Name	Signature	Title	Date



SAN JUAN DIVISION

February 20, 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 #75A 1450'FSL, 1845'FEL Section 23, T-29-N, R-07-W, Rio Arriba County, NM API #30-039-25616

Dear Mr. LeMay:

This is a request for administrative approval for downhole commingling the Blanco Mesa Verde and Basin Dakota pools in the subject well. This is a new drill Mesa Verde/Dakota well for the 1997 Program.

To comply with the New Mexico Oil Conservation Division rules, Burlington Resources Oil & Gas Company 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. Expected production curve for both Mesa Verde and Dakota;
- Notification list of offset operators Burlington is the operator of the unit;
- 5. Shut in wellhead pressure and calculated down hole pressure of surrounding wells;
- 6. Nine-section plats for the Mesa Verde and Dakota.

Notification of Mesa Verde and Dakota interest owners is covered under Order R-10697 dated November 7, 1996.

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, Spannied

Peggy Bradfield Regulatory/Compliance Administrator

xc: Bureau of Land Management

DISTRICT I P.Q. Box 1980, Hobbs, NM 88241-1980 <u>DISTRICT II</u> 811 South First St., Artesia, NM 88210-2835 **DISTRICT III** 1000 Rio Brazos Rd, Aztec, NM 87410-1693

State of New Mexico Energy, Minerals and Natural Resources Department **OIL CONSERVATION DIVISION**

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

Form C-107-A New 3-12-96 APPROVAL PROCESS : _X_ Administrative ____Hearing **EXISTING WELLBORE** __YES __x_NO

APPLICATION FOR DOWNHOLE COMMINGLING

PO Box 4289, Farmington, NM 87499 **Burlington Resources Oil & Gas Company** Address Operator San Juan 29-7 Unit 75A J 23-29-7 **Rio Arriba** Unit Ltr. - Sec - Twp - Rge County Lease Well No.

Spacing Unit Lease Types: (check 1 or more)

OGRID NO14538	Property Code	7465	_ AF

_, (and/or) Fee ____X_ API NO. _30-039-25616__Federal ___x___, State _

The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone
1. Pool Name and Pool Code	Blanco Mesaverde - 72319		Basin Dakota - 71599
2. Top and Bottom of Pay Section (Perforations)	will be supplied upon completion		will be supplied upon completion
3. Type of production (Oil or Gas)	gas		gas
4. Method of Production (Flowing or Artificial Lift)	flowing	na na serie de la composición de la com La composición de la c	flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	(Current) a. 523 psi (see attachment)	a.	a. 953 psi (see attachment)
Gas & Oil - Flowing: Massured Current All Gas Zones: Estimated or Measured Original	(Original) b. 1280 psi (see attachment)	b.	b. 1479 psi (see attachment)
6. Oil Gravity ([°] API) or Gas BTU Content	BTU 1189		BTU 1053
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: 6as: % % will be supplied upon completion	Oil: % Gas: %	Oil: Gas: %

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? ___Yes __x__No ___Yes __x__No _x_Yes ___No

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 other? __x_ Yes ___ No

13. Will the value of production be decreased by commingling? ____ Yes _X_ 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). ____Reference Order R-10697 attached_ 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 working, overriding, and royalty interests for uncommon interest cases.
 * Any additional statements, data, or documents required to support commingling.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATUREDATE2/20/97
TYPE OR PRINT NAMEJames A. Smith TELEPHONE NO. (505) 326-9700

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

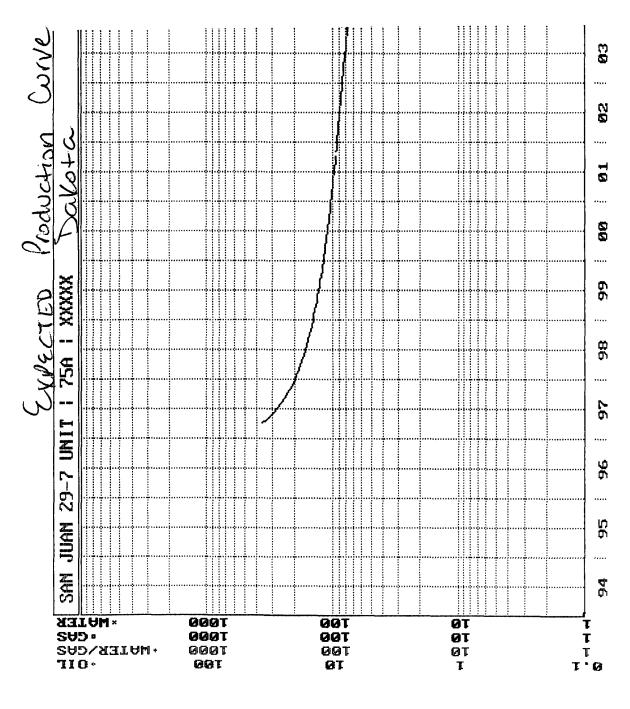
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State of New Mexico Energy, Minerals & Natural Resources Department

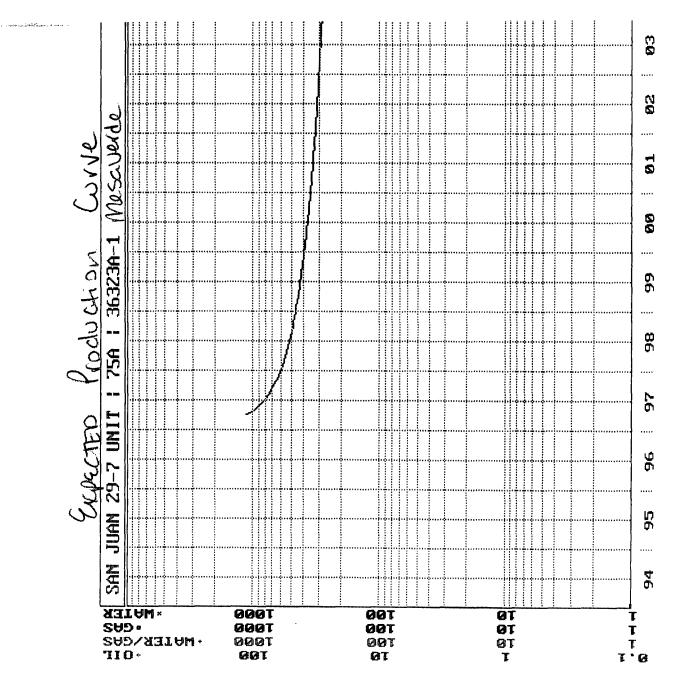
OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Form C-102 Revised February 21, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Comes Fee Lease - 3 Comes

AMENDED REPORT

		WE	LL LOO	CAT	ION ANE) ACR	RE.	AGE DEDIC	CAT	TON PL	AT		
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30-039- 72319/7								co Mesave	rde	/Basin	Dakot	<u>a</u>	
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'OGRID	No.					Operator							* Elevation
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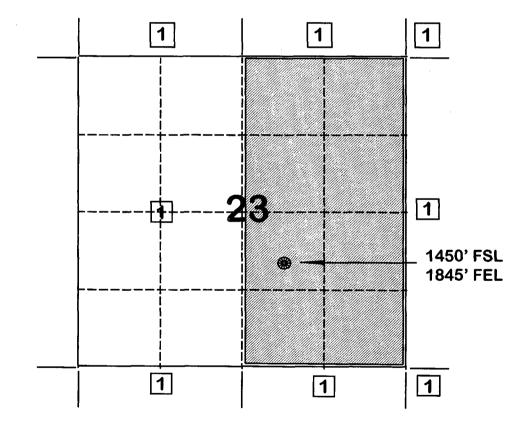
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BURLINGTON RESOURCES OIL AND GAS COMPANY

San Juan 29-7 Unit #75A OFFSET OPERATOR \ OWNER PLAT

Mesaverde/Dakota Formations Commingle Well

Township 29 North, Range 7 West



1) Burlington Resources Oil and Gas Company

Page No.: 1 Mesaverde

Print Time: Mon Feb 10 14:51:31 1997 Property Name: SAN JUAN 29-7 UNIT | 75 | 69675-1 55 29-7 #75A Table Name: K:\ARIES\RR97PDP\TEST.DBF Revent Well Property ID: 4467

--DATE-- ---CUM_GAS-- M_SIWHP

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06/05/60	0	1102.08-original
07/07/60	0	1101.0
11/06/60	58000	781.0
03/05/61	138000	773.0
03/13/62	263000	727.0
10/18/63	444000	648.0
02/07/64	476000	679.0
11/24/65	661000	662.0
02/28/66	702000	639.0
03/03/67	825000	650.0
03/05/68	937000	650.0
05/15/69	1060929	600.0
08/18/70	1194346	593.0
03/30/71	1267294	543.0
06/12/72	1427166	520.0
07/09/73	1566000	381.0
10/29/73	1610797	420.0
08/21/74	1710229	439.0
04/20/76	1902953	426.0
05/16/78	2131985	399.0
07/18/80	2297311	465.0
05/19/82	2420058	503.0
09/19/84	2525780	568.0
09/03/86	2637872	542.0
10/08/89	2807840	552.0
02/18/91	2871818	550.0
07/05/91	2885866	562.0
05/03/93	3066303	457.0 E- Wrient
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Dakota

Page No.: 1 Print Time: Mon Feb 10 14:56:19 1997 Property ID: 2099 Property Name: SAN JUAN 29-7 UNIT | 138 | 2554A-1 55 29-7 #75A Table Name: K:\ARIES\RR97PDP\TEST.DBF --DATE-- ---CUM GAS-- M SIMUP

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01/26/87	0	1232.0 Original
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04/09/90	124560	862.0
07/01/92	166875	592.0
06/18/94	197926	800.0 € wrient

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GAS GRAVITY	0.619
COND. OR MISC. (C/M)	C
%N2	0.24
%CO2	1.52
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	8015
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	800
BOTTOMHOLE PRESSURE (PSIA)	952.7

SAN JUAN 29-7 UNIT #138 DAKOTA - CURRENT

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GAS GRAVITY	0.619
COND. OR MISC. (C/M)	
%N2	0.24
%CO2	1.52
%H2S	0
DIAMETER (IN)	1.5
DEPTH (FT)	8015
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	200
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1232
BOTTOMHOLE PRESSURE (PSIA)	1479.0

SAN JUAN 29-7 UNIT #138 DAKOTA - ORIGINAL

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COND. OR MISC. (C/M)	_
0.40	3
%N2 0.13	
%CO2 0.97	7
%H2S 0	5
DIAMETER (IN) 2.375	5
DEPTH (FT) 5338	5
SURFACE TEMPERATURE (DEG F) 60	5
BOTTOMHOLE TEMPERATURE (DEG F) 150)
FLOWRATE (MCFPD)	5
SURFACE PRESSURE (PSIA) 457	7
	_
BOTTOMHOLE PRESSURE (PSIA) 522.6	5

SAN JUAN 29-7 UNIT #75 MESAVERDE - CURRENT

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GAS GRAVITY	0.698
COND. OR MISC. (C/M)	C
%N2	0.13
%CO2	0.97
%H2S	0
DIAMETER (IN)	2.375
DEPTH (FT)	5338
SURFACE TEMPERATURE (DEG F)	60
BOTTOMHOLE TEMPERATURE (DEG F)	150
FLOWRATE (MCFPD)	0
SURFACE PRESSURE (PSIA)	1102
BOTTOMHOLE PRESSURE (PSIA)	1280.4

SAN JUAN 29-7 UNIT #75 MESAVERDE - ORIGINAL

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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:

3

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.

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.