\$		DHC	- 2/23/98
DISTRICT I P.O. BOX 1980, HODDS, NM 88241-1980 DISTRICT II B11 South First St., Artesia, NM 88210-2835 DISTRICT III 1000 Rig Brazos Rd, Aztec, NM 87410(1893) ERVA	State of Ne Energy, Minerals and Natur OIL CONSERVA 2040 S. Santa Fe, New Me APPLICATION FOR DOW	w Mexico al Resources Department TION DIVISION Pacheco xico 87505-6429 /NHOLE COMMINGLING	Form C-107-A New 3-12-96 APPROVAL PROCESS: AdministrativeHearing EXISTING WELLBORE YESNO
Phillips Petroleum (Company, 5525 Hwy.	64, Farmington, NM	87401
San Juan 30-5 Unit	#27M C, Sec.	20, T30N, R5W R	io Arriba, NM
OGRID NO. 017654 Property Code		-039-25669 Federal	Mit Leese Types: (check 1 or more) X, State, (and/or) Fee
The following facts are submitted in support of downhole commingling:	Upper Zone	Intermediate Zone	Lower Zone statutes a factor of the state
1. Pool Name and Pool Code	72319 Blanco Mesaverde		71599 Basin Dakota
2. Top and Bottom of Pay Section (Perforations)			7778-7947'
3. Type of production (Oil or Gas)	Gas		Gas
4. Method of Production (Flowing or Artificial Lift)	Flowing		Flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current	a. (Current) 1000 RSi (est.)	a.	^{a.} 1246 (24 hr SI psi
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	b. ^(Original) 1294 psi (est.)	b.	^{b.} 3412 (est.)
6. Oil Gravity ([°] API) or Gas BTU Content	1030 BTU/ft ³		990 BTU/ft ³
7. Producing or Shut-In?			Producing
Production Marginal? (yes or no)	YES		YES
 If Shut-In, give date and oil/gas/ water rates of last production Note: For new zones with no production history, applicant shall be required to attach production 	Date: Rates:	Date: Rates:	Date: Rates:
estimates and supporting data If Producing, give date andoil/gas/ water rates of recent test (within 60 days) 	Date: Estimate Rates: (400 mcfd)	Date: Rates:	Date: 12/29/97 Rates: 280 mcfd 0 bwpd
8. Fixed Percentage Allocation Formula -% for each zone	Oil: Gas: %	Oil: Gas: %	Oil: Gas: %
 6. Oil Gravity ([°]API) or Gas BTU Content 7. Producing or Shut-In? Production Marginal? (yes or no) If Shut-In, give date 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 If Producing, give date andoil/gas/ water rates of recent test (within 60 days) 8. Fixed Percentage Allocation Formula -% for each zone 9. If allocation formula is based submit attachments with support 	1030 BTU/ft ³ YES Date: Rates: Date: Estimate Rates: (400 mcfd) Oil: % Gas: %	Date: Rates: Date: Rates: Oil: % Ges: % rrent or past production, or is t method and providing rate pro	990 BTU/ft ³ Producing YES Date: Retes: Date: 12/29/97 Rates: 280 mcfd 0 bwpd Oil: % Gas: %

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 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 crossflowed production be recovered, and will the allocation formula be reliable. X Yes No (If No, attach explanation)

<u>R-10771</u>

ORDER NO(S).

12. Are all produced fluids from all commingled zones compatible with each other? X Yes No

_Yes X_No 13. Will the value of production be decreased by commingling? (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. ___Yes ___ No

15. NMOCD Reference Cases for Rule 303(D) Exceptions:

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.

SIGNATURE March Stodala	TITLE Reservoir Engine ATE	1/29/98
TYPE OR PRINT NAME Mark W. Stodola		599-3455



4.454 345-5

State of New Mexico Energy, Minerals & Natural Resources Department Form C-102 District 1 PO Bak 1980, Italias, NM 88241-1980 Revised October 18, 1994 Instructions on back District II 811 South First, Artesia, NAI 88210 OIL CONSERVATION DIVISION Submit to Appropriate District Office 2040 South Pacheco State Lease - 4 Copies District III Fee Lease - 3 Copies Santa Fe, NM 87505 1000 Rio Bennis Rd., Antee, NM 87410 District IV AMENDED REPORT 2040 South Pacheco, Santa Fe, NAI 87505 WELL LOCATION AND ACREAGE DEDICATION PLAT ¹ Pool Name ¹ Paul Code All Number 71599 Basin Dakota "Property Carle 009258 ³ Projectly Name • Well Number SAN JUAN 30-5 UNIT 27-M * Elevativa Osweniue Name OCRID No. PHILLIPS PETROLEUM CO. 6382 017654 ¹⁰ Surface Location North/South line Int Ida Feet from the East/West line Township Feet from the County UI. or lat no. Section Range WEST RIO ARRIB รพ 790 NORTH 1730 20 30N ¹¹ Bottom Hole Location If Different From Surface . Lat Ida Feet from the North/South line Feet from the Fast/West line County Township Range UL or lot no. Section $^{\circ}$ " Order No. " Joint or Infill " Consolidation Code ⁴⁴ Dedicated Acres 320 Y U NO 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 16 1062 5270.10' I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief 1730' Signatur SF-078740 rec Α, Printed Name Drilling/Production Spvr Title March 19, 1997 5280.00 Date 20 ¹⁸SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. Date of Surv Siroatu Ccrufi

5266.80'

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PHILLIPS PETROLEUM COMPANY 5525 HWY 64 NBU 3004 FARMINGTON. NEW MEXICO 87401

WELL NAME: SAN JUAN 30-5 # 27M FORMATION: DAKOTA

COUNTY: RIO ARRIBA STATE: NEW MEXICO

ELEVATION: GL TOTAL DEPTH: 7957' PERFORATIONS: 7778' TO 7947' TUBING SIZE: 2 3/8 TO 7776' CASING SIZE: TO PACKER: OTHER: F NIPPLE @ 7745' DATE: JANUARY 21. 1998

TYPE TEST: STATIC GRADIENT

CASING PRESSURE: 1160 TUBING PRESSURE: 765 DIL LEVEL: 765 WATER LEVEL: 6965' TEMPERATURE: 6965' AMERADA ELEMENT NUMBER: 87977 RANGE: 0-2500 WELL STATUS: SHUT IN 24 HOURS

INDIVIDUAL WELL DATA SHEET

FLUWIND	GRADIENI	INAVERSE

DEPTH	PRESSURE	SRADIENT
IN FEET	PSIG	PSI/FOOT
fastering, while provide the state of the st		
Ģ	765	
2000	787	0.011
4000	814	0.01C
6000	839	0.012
7462	1093	0.173
7662	1169	0.580
7862	1246	0.385

H & H WIRELINE SERVICE INC. P. D. BOX 899 FLORA VISTA. N. MEX. 87415 OPERATOR: CHARLES HUGHES UNIT NO. T-10



PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401 5525 HWY. 64 NBU 3004

January 29, 1998

New Mexico Oil & Gas Conservation Div. 2040 South Pacheco Santa Fe, NM 87505-6429

> Downhole Commingling Allocation Method on the San Juan 30-5 Unit #27M

Dear Sirs:

Phillips is proposing to utilized the subtraction method on the subject well for approximately six months after actual commingling occurs. After the six month period we will convert to the ratio method as indicated in our commingling application. We believe this will be a more accurate method of allocating production considering that the Dakota interval has been producing for several months and that the production will not be stabilized on the Mesaverde for several months.

Dakota Production Forecast

January 1998	8,604	February 1998	7,704
March 1998	8,454	April 1998	8,110
May 1998	8,307	June 1998	7,969
July 1998	8,163	August 1998	8,091
September 1998	7,762	October 1998	7,950

For example, if the total volume for September 1998 were 13,400 mcf, then the Dakota would be allocated 7,762 mcf and the Mesaverde 5,638 mcf. And subsequently, the Dakota would be allocated (7762/13400) or 57.92%, and Mesaverde would be allocated (5638/13400) or 42.08%.

Sincerely, PHILLIPS PETROLEUM COMPANY

Monh Hostela

Mark W. Stodola Reservoir Engineer

MS/pc

cc: OCD - Aztec BLM- Farmington NM Commissioner Of Public Lands - Santa Fe



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PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401 5525 HWY. 64 NBU 3004

December 17, 1997

NM Oil & Gas Conservation Division 1000 Rio Brazos Rd. Aztec, NM 87410

Downhole Commingling Allocation Method on the 30-5 Unit #110M

Dear Sirs:

Phillips proposes to utilize the subtraction method through June 1998, and then convert to the ratio method after June 1998. We believe this will be a more accurate method of allocating production considering that the production will not be stabilized on the Mesaverde for several months.

Dakota Production Forecast

Dec. 1997	6879 mcf
Jan. 1998	6814 mcf
Feb. 1998	6097 mcf
March 1998	6687 mcf
April 1998	6410 mcf
May 1998	6561 mcf
June 1998	6290 mcf

For example, if the total June 1998 were to be 12,290 mcf, then the Dakota would be allocated 6290 mcf and the Mesaverde 6000 mcf. And subsequently, the Dakota would be allocated (6290/12,290) or 51.18%, and the Mesaverde would be allocated (6000/12,290) or 48.82%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark W Stodala

Mark W. Stodola by Reservoir Engineer



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE AZTEC NM 87410 (505) 334-6178 FAX: (505) 334-6170 http://emnrd.state.nm.us/ocd/District Ili/Jalistric.htm

GARY E. JOHNSON

Jennifer A. Salisbury CABINET SECRETARY

January 6, 1998

Mr Mark W Stodola Phillips Petroleum Co 5525 Hwy 64 NBU 3004 Farmington NM 87401

Re: San Juan 30-5 Unit #110M, API# 30-039-25658, E-16-30N-05W, DHC

Dear Mr. Stodola:

Your recommended allocation of commingled production using the subtraction method for the referenced well is hereby accepted through the month of June 1998. Beginning in July you will submit a recommended allocation formula based on historical production values.

If you have any questions, please contact me.

Yours truly,

Burch reach

Érnie Busch District Geologist/Deputy O&G Inspector

EB/sh

cc: well file

Dakota Production Forecast for 30-5 Unit Well #27M

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Year	Month	Gas (MCF)
1998	1	8,604
	2	7,704
	3	8,454
	4	8,110
	5	8,307
	6	7,969
	7	8,163
	8	8,091-
	9	7,762
	10	7,950
	11	7,627
	12	7,812
1999	13	7,744
	14	6,933
	15	7,609
	16	7,299
	17	7,476
	18	7,172

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30-5mvtc

MWS

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MEP81-01 Wellzone F0628 02 Y: Screen: 1 (1-Prod, 3 Type: D (T-Total, Period: M (M-Mpthly	PARPI - WELI DAILY r: 1997 Mth: 2-Inj, 3-Boti D-Daily Avg	LZONE PRODUCT AVERAGE BY M 06 Property h) Well No:) Field: Cum) Resurt	ION BROW ONTH : 650423 000027 042233 20076	SE SAN C M BASII	Dat Use JUAN 30-5 N	:e: 1 er: M #27M	/28 IWST I DK	/98 ODC)
	, i i i y, c i								·
ADJ	PI	RODUCED			DAYS ·		- W	ELI	, –
FLG DATE O	IL (BBL)	GAS (MCF D)	WATER (B	BL)	PROD	OP	ST	CL	$\mathbf{T}\mathbf{Y}$
* 1997-06	0.00	ō		0	0.00	0	82	11	2
* 1997-07	0.00	0		0	0.00	0	50	11	2
* 1997-08	0.00	304		0	31.00	31	11	11	2
* 1997-09	0.00	409		0	30.00	30	11	11	2
* 1997-10	0.00	304		0	31.00	31	11	11	2
1997-12	0.00	207		Ō	31.00	31	11	11	2

PA1=ICE	PA2=Exit	PF1=Help	PF3=End		PF11=GRAPH
Transfer->	>	PF7=Backward	PF8=Forward	PF4=PREV SCREEN	PF12=LOG GRAPH

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Exhibit 3.2

Production Allocation Methodology

- Adding New Zone to Existing Zone Initially Subtraction Method followed by Fixed Allocation Method
 - Subtraction Method (+/- 1st 12 months)
 - Forecast production rate by month for existing zone utilizing established decline curve for zone
 - Subtract forecasted rate from commingled rate to define new zone rate
 - Utilize subtraction method for +/- 12 months until new zone rate stabilizes, then utilize fixed allocation method with current rates
 - Fixed Allocation Method (after Subtraction Method)
 - Utilize forecasted rate from established decline curve for lower zone
 - Calculate upper zone rate by subtracting lower zone rate from commingled rate
 - Lower zone allocation = <u>Lower zone rate</u> Commingled rate
 - Upper zone allocation = (Commingled rate - Lower zone rate) / Commingled rate

Attachment

OCD Form C-107A (3/12/96)

Item No. 12 - additional explanation:

Based on water analysis from the Mesaverde and Dakota zones and discussions with the chemical treating/analysis company the water from these two zones are compatible. Lab analysis of the individual waters from both the Mesaverde and Dakota formations resulted in positive scaling indices for barium sulfate. There was a slight increase in the barium sulfate scaling index of the combined waters relative to the scaling index of the individual waters.

None of the waters, combined or individual, had meaningful scaling tendencies and combined with the fact that typical water production from either of these zones in San Juan 30-5 are 0-1 BWPD and no barium sulfate scale has been detected to date, no negative impacts to the formations are anticipated.