	2/98	SUSPENSE 7/2/98 ENGINEER DC LOGGED BY W TYPE DHC
•	/	ABOVE THIS LINE FOR DIVISION USE ONLY
		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 2040 South Pacheco, Santa Fe, NM 87505
	A	DMINISTRATIVE APPLICATION COVERSHEET
THIS COVERS	HEET IS I	WANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS
Application A	cronym	WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
[DHC [[EOI	-Downi PC-Poo [1 R-Qualif	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] nole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] I Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] NFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] Net Storage] [NFR-Positive Production Response]
[1] TYPE	C OF A [A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Directional Drilling NSL NSP DD SD
	Check	Cone Only for [B] or [C]
	[B]	Imaging - Storage - Measurement Imaging - Measurement
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
[2] NOTI	FICAT	ION REOUIRED TO: - Check Those Which Apply, or Does Not Apply
[-]	[A]	U 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]	General of the above, Proof of Notification or Publication is Attached, and/or,
	[F]	U Waivers are Attached

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Certification

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. <u>I understand that any omission of data</u> (including API numbers, pool codes, etc.), pertinent information and any required notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

_	Mark	Stodds
	Signature	

Reservoir Engr.

Title

6/9/98

Mark Stodola

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DISTRICT |

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

DISTRICT II 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**

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

APPROVAL PROCESS:

X_YES

__ NO

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

X Administrative Hearing EXISTING WELLBORE

APPLICATION FOR DOWNHOLE COMMINGLING

San Juan 30-5 Unit #22A P, Section 17, 130N, R5W, R10 Allib	.,
The second se	a. NM
Operator Address	
Phillips Petroleum Company 5525 Hwy. 64, Farmington, NM 8740	-

Lease OGRID NO.

Spacing Unit Lease Types: (check 1 or more) 017654 Property Code 009258 API NO. 30-039-25497 Federal

, State , (and/or) Fee X

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)	4142-5736'		7752' - 7828'
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) 700 psi (est.)	ð.	a. llll psi (24 hr S
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	b. ^(Original) 1294 psi (est.)	Ь.	b. 3412 psi (est.)
6. Oil Gravity ([°] API) or Gas BTU Content	1080 btu/ft ³		1000 btu/ft ³
7. Producing or Shut-In?	Producing		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: Rales:	Date: Rates:
estimates and supporting data If Producing, give date andoil/gas/ water rates of recent test (within 60 days)	Date: 3/16/98 Rates: 333 mcfd 0 bopd	Date: Rates:	Date: 3/16/98 Rates: 420 mcfd 0 bopd
8. Fixed Percentage Allocation Formula -% for each zone	Oil: Gas: %	Oil: Gas: %	Oit: 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?

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) 11. Will cross-flow occur?

ORDER NO(S).

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

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:

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 M	to the b	est of my knowle	edge and belief.	
SIGNATURE Mark Stodala	TITLE	Reservoir	Engr. DATE	

Mark Stodola TYPE OR PRINT NAME

R-10771

TELEPHONE NO. (_____) _____3455

6/9/98

es X

Yes

No No No

· · ·	DISTRICT I P.O. Box 1980, Ed DISTRICT II P.O. Drawer DD, J	obba, N.M. Artesta, N.J	88241-1980 L 68211-071		.orgy, Mine	State of rels & Nat	Net	r Mexico Resources Depe))) Submit	Rev to App S	lised Fe Instru ropriate Itate Le Fee Le	Form C-102 buary 21, 1994 ctions on back District Office ase - 4 Copies ase - 3 Copies
1	DISTRICT III 1000 Rie Braxos DISTRICT IV PO Box 2088, Sar	Rd., Artoo, ata Po, KM	¥. 87410 87504-2088	 	OIL C	ONSERV P.O. anta Fe,	ATIC Box S NM 8	DN DIVISION 2088 7504–2088		C) amen	Ded report
	·····			WELL I	OCATIC	ON AND	AC	REAGE DED	ICATION P.	LAT		
	IqA'	Number		7150	Pool Code	210	Bac	in Dakota	Fool Nam	Meca	verde	
	30-0	039-2	5497	129	9 & 72	319	раз			Mesu		all Burnham
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				"Botte	om Hole	Locati	on I	Different Fro	om Surface			
	UL or lot no.	Section	Township	Range	Lot Idn	Feet from	the	North/South line	Feet from the	Bast/Te	at line	County
	Р			1							····	
M	Dedicated Acre	320 ac	or Infill ¹⁴ C	Consolidation	L Code ¹⁰ 0	rder No.						
D	-E/2 - :	320 ac		Unitia	zed					<u></u>		
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			ORAN	ION-STA	NDARD	UNIT HA	S BE	EN, APPROVED	BY THE DIV	ISION		
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Initial Production Rate	=	200 MCFD
Hyperbolic Exponent	=	0.33
Decline Rate	=	12 %

29-5 Unit #22A Dakota Forecast

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PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401 5525 HWY. 64 NBU 3004

June 9, 1998

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

Downhole Commingling Allocation Method on the San Juan 30-5 Unit #22A

Dear Sirs:

Phillips is proposing to utilize the subtraction method on the subject well for approximately 1 year after actual commingling occurs. After the first year, 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 plans are to restimulate the Lewis Shale interval of the Blanco Mesaverde formation before commingling both zones.

Dakota Production Forecast

August 1998	6,169	February 1999	5,251
September 1998	5,910	March 1999	5,758
October 1998	6,047	April 1999	5,519
November 1998	5,794	May 1999	5,647
December 1998	5,928	June 1999	5,412
January 1999	5,869	July 1999	5,539

For example, if the total volume for September 1998 were 10,920 mcf, then the Dakota would be allocated 5,910 mcf and the Mesaverde 5,010 mcf. And subsequently, the Dakota would be allocated (5,910/10,920) or 54.12%, and Mesaverde would be allocated (5,010/10,920) or 45.88%.

Sincerely,

PHILLIPS PETROLEUM COMPANY

Mark Stor

Mark W. Stodola Reservoir Engineer

MS/pc

cc: OCD – Aztec BLM- Farmington NM Commissioner of Public Lands – Santa Fe PHILLIPS PETROLEUM COMPANY 5525 HWY 64 NBU 3004 DATE: MAY 28, 1998 FARMINGTON, NEW MEXICO 87401 WELL NAME: SAN JUAN 30-5 # 22A TYPE TEST: STATIC GRADIENT FORMATION: DAKOTA COUNTY: RIO ARRIBA STATE: NEW MEXICO CASING PRESSURE: MV 430 ELEVATION: GL PBTD 7862′ TUBING PRESSURE: DK 688 TOTAL DEPTH: PERFORATIONS: 7728' TO 7752' OIL LEVEL: 2 3/8 TO 7735' WATER LEVEL: 65621 TUBING SIZE: то **TEMPERATURE:** CASING SIZE: PACKER: 7714 AMERADA ELEMENT NUMBER: 87977 RANGE: 0-2500 OTHER: AT SHUT IN MV CASING 390, DK TUBING WELL STATUS: SHUT IN 24 HRS TD @ 7720' 690. 239,000 CFM INDIVIDUAL WELL DATA SHEET

FLOWING GRADIENT TRAVERSE

DEPTH	PRESSURE	GRADIENT		
IN FEET	PSIG	PSI/FOOT		
	1786 UN PAGA///)FIRMAGASASI MITO/14946)			
0	684			
2000	715	0.016		
4000	747	0.016		
6000	774	0.014		
7340	966	0.143		
7540	1050	0.420		
7700	1111	0.381		

• •

H & H WIRELINE SERVICE INC. P. O. BOX 899 FLORA VISTA, N. MEX. 87415 OPERATOR: CHARLES HUGHES UNIT NO. T-10 PHILLIPS PETROLEUM SAN JUAN 30-5 # 22A



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1997-07		0.00		231		0	31.00	31 11	09 2
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1997-09		0.00		186		0	30.00	30 11	09 2
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1998-02		0.00		153		Ō	28.00	28 11	09 2
1998-03		0.00		171		0	31.00	31 11	09 2
1998-04		0.00		273		0	30.00	30 11	. 09 2
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ADJ			PRODUC	CED			DAYS		WELL -	-
FLG DATE	OII	」(BBL)	GAS	(MCF)	WATER	(BBL)	PROD	OP SI	CL TY	7
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1997-07		0.00		218		0	31.00	31 11	09 2	
1997-08		0.00		156		0	31.00	31 11	09 2	
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30-5 MV





6/9/98

WWS

30-5mvtc

ć 2 MWST 06/09/98 09:08 (YAQ\J88) WTR 105 102 101 001 F061802 ZONE-650113170000022AF061802 AP1-30039254970000 THRU 98/04 2003 2002 215698. MCF GAS BBL WTR Current Cums 2001 335. 2000 1999 1998 LEASE- 650113 : SAN JUAN 30-5 MESA VERDE RESVR- 170 : BLANCO WELL - 00022A CUM MCF =216250. 10/95-4/98 117.5 2.58 0.00 215698. 149.4 1997 . . •• 1995 1 1996 1 AVERAGE ONTIME =0.926 INITIAL PROD / DAY REMAINING LIFE FINAL PROD / DAY CUM PRODUCTION 4 ,01 102 20 L 101 (MCF/DAY) SYD 0.1 0.0 DOWNTIME FRACT. +



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MWST 06/09/98 09:08

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.