

DATE IN 3/31/99	SUSPENSE 4/20/99	ENGINEER DC	LOGGED BY W	TYPE DHC
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ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Engineering Bureau -  
 2040 South Pacheco, Santa Fe, NM 87505



2304

**ADMINISTRATIVE APPLICATION COVERSHEET**

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**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 APPLICATION - Check Those Which Apply for [A]**

[A] Location - Spacing Unit - Directional Drilling  
☐ NSL ☐ NSP ☐ DD ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement  
☒ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[2] **NOTIFICATION REQUIRED TO: - Check Those Which Apply, or ☐ Does Not Apply**

- [A] ☐ 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] **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, F, ORRI) is common. I understand that any omission of data (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.**

Print or Type Name

Signature

Title

Date

## DISTRICT I

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

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

## APPLICATION FOR DOWNHOLE COMMINGLING

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

## APPROVAL PROCESS :

☒ Administrative ☐ Hearing

## EXISTING WELLBORE

☒ YES ☐ NO

Burlington Resources Oil &amp; Gas Company

PO Box 4289, Farmington, NM 87499

Operator

Address

San Juan 27-5 Unit

120

23-27N-05W

Rio Arriba

Lease

Well No.

Unit Ltr. - Sec - Twp - Rge

County

Spacing Unit Lease Types: (check 1 or more)

OGRID NO.

14538

Property Code

7454

API NO.

30-039-20313

Federal ☒

State

(and/or) Fee

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		flowing
5. Bottomhole Pressure Oil Zones - Artificial Lift: Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated or Measured Original	(Current) a. 732 psi (see attachment)  (Original) b. 1316 psi (see attachment)	a.  b.	a. 1123 psi (see attachment)  b. 3235 psi (see attachment)
6. Oil Gravity (API) or Gas BTU Content	BTU 1196		BTU 1134
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 rates 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: % will be supplied upon completion

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? ☐ Yes ☒ No  
If not, have all working, overriding, and royalty interests been notified by certified mail? ☐ Yes ☒ No  
Have all offset operators been given written notice of the proposed downhole commingling? ☒ Yes ☐ No11. Will cross-flow occur? ☒ 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. ☒ Yes ☐ No (If No, attach explanation)12. Are all produced fluids from all commingled zones compatible with each other? ☒ Yes ☐ No13. 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. ☒ Yes ☐ No15. NMOCD Reference Cases for Rule 303(D) Exceptions: ORDER NO(S). ☐ Reference Order ☐ R-10694 ☐ 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.

SIGNATURE: Sean Corrigan TITLE: Production Engineer DATE: 03-29-99

TYPE OR PRINT NAME: Sean Corrigan 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

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 Copies  
Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number 30-039-20313		2 Pool Code 72319/71599		3 Pool Name Blanco Mesaverde/Basin Dakota	
4 Property Code 7454		5 Property Name San Juan 27-5 Unit			6 Well Number 120
7 OGRID No. 14538		8 Operator Name Burlington Resources Oil & Gas Company			9 Elevation 6508' GR

10 Surface Location

UL or lot no. L	Section 23	Township 27N	Range 5W	Lot Idn	Feet from the 1840	North/South line South	Feet from the 800	East/West line West	County RA
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11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
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12 Dedicated Acres MV-W/320 DK-S/320	13 Joint or Infill	14 Consolidation Code	15 Order No.
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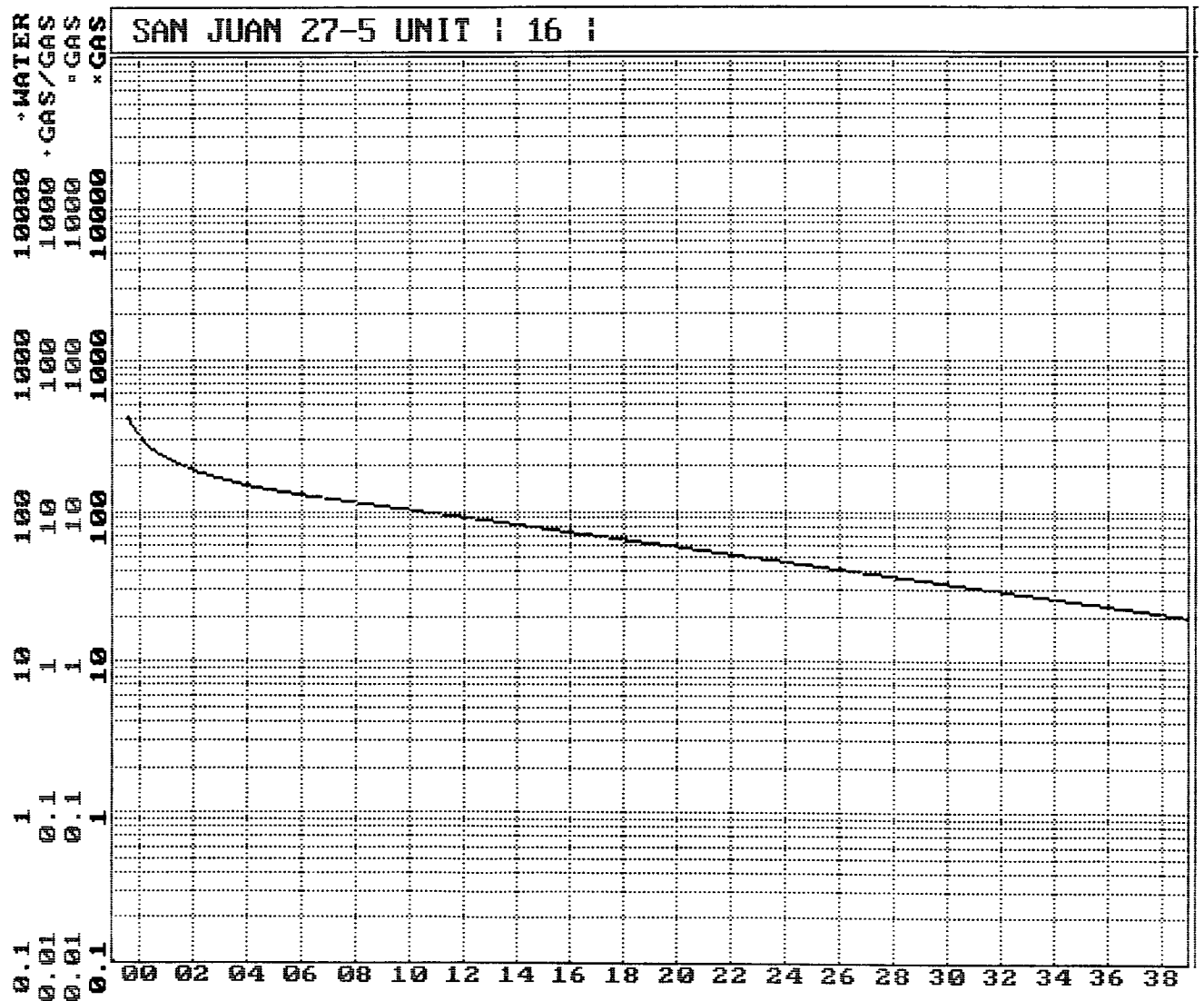
NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED  
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

16				17 OPERATOR CERTIFICATION <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</i>  Signature Peggy Bradfield Printed Name Regulatory Administrator Title  Date	
Original plat from David O. Vilven 3-12-70					
18 SURVEYOR CERTIFICATION <i>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.</i>  Date of Survey Signature and Seal of Professional Surveyer:  Certificate Number					
800'					
1840'					

# San Juan 27-5 Unit #120

## Expected Production Curve

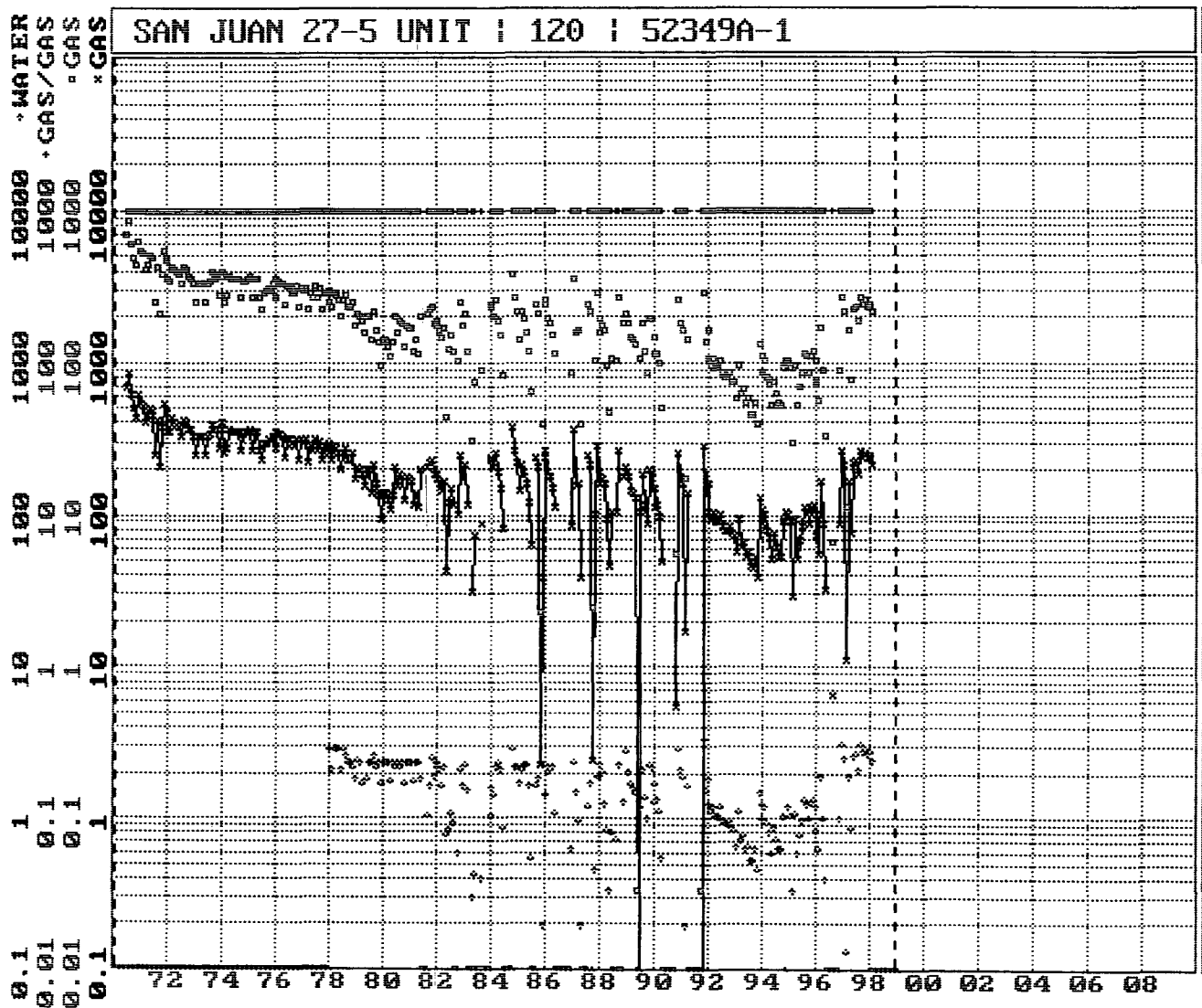
### Mesaverde Formation



# San Juan 27-5 Unit #120

Actual Production

Dakota Formation



**San Juan 27-5 Unit #120**

Bottom Hole Pressures  
Flowing and Static BHP  
Cullender and Smith Method  
Version 1.0 3/13/94

Mesaverde	Dakota
<u>MV-Current</u>	<u>DK-Current</u>
GAS GRAVITY 0.7	GAS GRAVITY 0.666
COND. OR MISC. (C/M) C	COND. OR MISC. (C/M) C
%N2 0.18	%N2 0.14
%CO2 0.81	%CO2 1.26
%H2S 0	%H2S 0
DIAMETER (IN) 2	DIAMETER (IN) 1.5
DEPTH (FT) 5564	DEPTH (FT) 7674
SURFACE TEMPERATURE (DEG F) 60	SURFACE TEMPERATURE (DEG F) 60
BOTTOMHOLE TEMPERATURE (DEG F) 137	BOTTOMHOLE TEMPERATURE (DEG F) 198
FLOWRATE (MCFPD) 0	FLOWRATE (MCFPD) 0
SURFACE PRESSURE (PSIA) 632	SURFACE PRESSURE (PSIA) 932
BOTTOMHOLE PRESSURE (PSIA) 732.1	BOTTOMHOLE PRESSURE (PSIA) 1122.8
<u>MV-Original</u>	<u>DK-Original</u>
GAS GRAVITY 0.7	GAS GRAVITY 0.666
COND. OR MISC. (C/M) C	COND. OR MISC. (C/M) C
%N2 0.18	%N2 0.14
%CO2 0.81	%CO2 1.26
%H2S 0	%H2S 0
DIAMETER (IN) 2	DIAMETER (IN) 1.5
DEPTH (FT) 5564	DEPTH (FT) 7674
SURFACE TEMPERATURE (DEG F) 60	SURFACE TEMPERATURE (DEG F) 60
BOTTOMHOLE TEMPERATURE (DEG F) 137	BOTTOMHOLE TEMPERATURE (DEG F) 198
FLOWRATE (MCFPD) 0	FLOWRATE (MCFPD) 0
SURFACE PRESSURE (PSIA) 1121	SURFACE PRESSURE (PSIA) 2651
BOTTOMHOLE PRESSURE (PSIA) 1316.1	BOTTOMHOLE PRESSURE (PSIA) 3235.0

Page No.: 1  
 Print Time: Wed Mar 03 09:30:48 1999  
 Property ID: 1384  
 Property Name: SAN JUAN 27-5 UNIT | 16 | 49640A-1  
 Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE-- ---CUM\_GAS-- M SIWHP  
 :::::Mc f::::: Psi:::::

11/07/56	0	1121.0
11/30/56	0	1120.0
07/30/57	24000	806.0
11/06/58	59000	670.0
09/22/59	74000	697.0
05/29/60	87000	711.0
09/13/61	117000	682.0
08/06/62	129000	744.0
07/16/63	141000	758.0
09/28/64	153000	782.0
10/25/65	166000	743.0
04/19/66	172000	782.0
11/24/67	200000	692.0
05/02/68	207000	571.0
08/28/70	240392	566.0
04/08/71	251176	539.0
08/09/72	271976	519.0
12/01/81	395306	600.0
10/20/86	444212	534.0
09/08/89	477021	620.0
07/28/91	490474	644.0
07/30/91	490474	632.0

San Juan 27-5 Unit #120

Mesaverde Offset

Page No.: 2

Print Time: Tue Mar 16 06:51:53 1999

Property ID: 1342

Property Name: SAN JUAN 27-5 UNIT | 120 | 52349A-1

Table Name: Q:\PUBLIC\GENTITY\GDPNOS\TEST.DBF

--DATE-- ---CUM\_GAS-- M SIWHP  
Mcf Psi

06/03/70	0	2651.0
10/23/70	80955	1709.0
07/22/71	209254	1368.0
06/06/72	341000	1243.0
07/19/73	474019	1145.0
05/22/75	698744	998.0
07/06/77	932399	898.0
05/01/79	1092633	1137.0
05/04/81	1204759	1462.0
02/20/84	1321536	1475.0
05/20/85	1393898	1462.0
07/12/88	1524340	1421.0
04/28/90	1608339	1099.0
03/11/99	1959785	932.0

San Juan 27-5 Unit #120

Existing Dakota



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

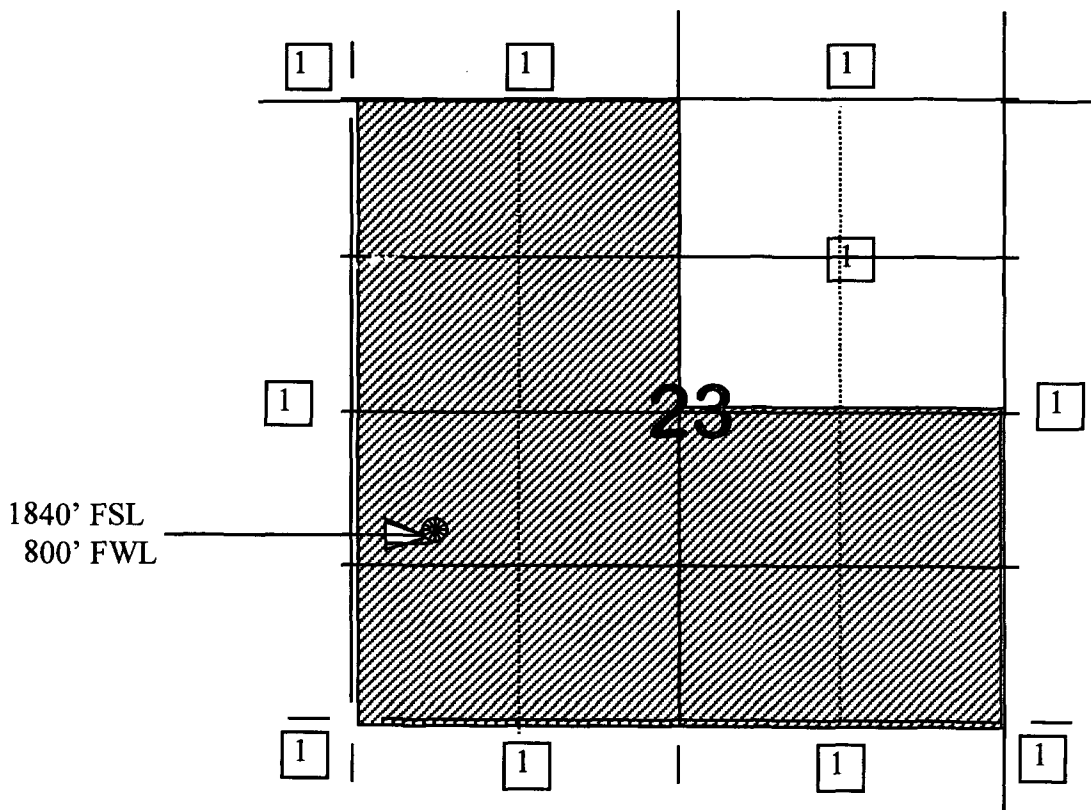
**San Juan 27-5 Unit #120**

**OFFSET OPERATOR/OWNER PLAT**

**Commingle Well**

**Mesaverde (W/2) /Dakota (S/2) Formations Well**

**Township 27 North, Range 5 West**



**1) Burlington Resources**

<p>NM 2103 59</p> <p>6</p> <p>S.d. 27-5 Un. NP (FC) S.d. 27-5 Un.</p>	<p>53A 65E NM 2103</p> <p>5</p> <p>S.d. 27-5 Un.</p>	<p>NM 2103 (1/2)</p> <p>4</p> <p>S.d. 27-5 Un.</p>	<p>NM 2103 21 (NWPC)</p> <p>3</p> <p>S.d. 27-5 Un. N.P.(D)SW/4 S.d. 27-5 Un.</p>	<p>23A 110E 110 7 (WEISER)</p> <p>2</p> <p>(NWPC) M.O.I.</p> <p>S.d. 27-5 Un.</p>	<p>NM 8734 WILLIAMS PROD.</p> <p>1</p> <p>S.d. 27-5 Un. M.P.(W) S.d. 27-5 Un.</p>
<p>NM 2106</p> <p>7</p> <p>S.d. 27-5 Un.</p>	<p>NM 2106</p> <p>8</p> <p>S.d. 27-5 Un.</p>	<p>NM 2106</p> <p>9</p> <p>S.d. 27-5 Un.</p>	<p>(AMOCO) NM 8735</p> <p>10</p> <p>S.d. 27-5 Un.</p>	<p>(AMOCO) NM 8735</p> <p>11</p> <p>S.d. 27-5 Un.</p>	<p>NM 8734 WILLIAMS PROD.</p> <p>12</p> <p>S.d. 27-5 Un.</p>
<p>NM 2106</p> <p>18</p> <p>S.d. 27-5 Un. C</p>	<p>NM 2101</p> <p>17</p> <p>S.d. 27-5 Un.</p>	<p>(WEISER) M.O.I.</p> <p>16</p> <p>S.d. 27-5 Un.</p>	<p>NM 8735 WILLIAMS PROD.</p> <p>15</p> <p>S.d. 27-5 Un.</p>	<p>NM 8737 (AMOCO)</p> <p>14</p> <p>S.d. 27-5 Un.</p>	<p>NM 8736 WILLIAMS PROD.</p> <p>13</p> <p>S.d. 27-5 Un.</p>
<p>NM 2101 (1/2)</p> <p>19</p> <p>S.d. 27-5 Un.</p>	<p>NM 2101</p> <p>20</p> <p>S.d. 27-5 Un.</p>	<p>NM 2100</p> <p>21</p> <p>S.d. 27-5 Un.</p>	<p>NM 4348</p> <p>22</p> <p>S.d. 27-5 Un.</p>	<p>NM 4940 NM 4941</p> <p>23</p> <p>S.d. 27-5 Un.</p>	<p>NM 2004</p> <p>24</p> <p>S.d. 27-5 Un.</p>
<p>(NWPC) NM 2102</p> <p>30</p> <p>S.d. 27-5 Un. NP (FC) S.d. 27-5 Un. NP (FC)</p>	<p>NM 2101</p> <p>29</p> <p>S.d. 27-5 Un. NP (FC) S.d. 27-5 Un.</p>	<p>NM 2101 NM 2100</p> <p>28</p> <p>S.d. 27-5 Un.</p>	<p>NM 2100 NM 4348</p> <p>27</p> <p>S.d. 27-5 Un.</p>	<p>130E NM 2005</p> <p>26</p> <p>S.d. 27-5 Un.</p>	<p>NM 4905 NM 1904</p> <p>25</p> <p>S.d. 27-5 Un.</p>
<p>NM 2102</p> <p>31</p> <p>S.d. 27-5 Un.</p>	<p>(WEISER)</p> <p>32</p> <p>S.d. 27-5 Un.</p>	<p>NM 2100</p> <p>33</p> <p>S.d. 27-5 Un.</p>	<p>NM 2100</p> <p>34</p> <p>S.d. 27-5 Un.</p>	<p>NM 2005</p> <p>35</p> <p>S.d. 27-5 Un.</p>	<p>(NWPC)</p> <p>36</p> <p>S.d. 27-5 Un.</p>

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. 11626  
ORDER NO. R-10694

APPLICATION OF BURLINGTON RESOURCES  
OIL & GAS COMPANY FOR THE ESTABLISHMENT  
OF A DOWNHOLE COMMINGLING "REFERENCE  
CASE" FOR ITS SAN JUAN 27-5 UNIT PURSUANT  
TO DIVISION RULE 303.E AND THE ADOPTION  
OF SPECIAL ADMINISTRATIVE RULES THEREFOR.  
~~SAN JUAN COUNTY, NEW MEXICO.~~

✓ RIO ARRIBA

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. Catnach and Michael E. Stogner, respectively.

NOW, on this 12th 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 27-5 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 27-5 Unit which encompasses some 23,043 acres in Township 27 North, Range 5 West, NMPM, San Juan County, New Mexico.

(5) Within the San Juan 27-5 Unit, the applicant currently operates one hundred and one (101) Basin-Dakota Gas Pool wells, one hundred and five (105) Blanco-Mesaverde Gas Pool wells, eighty-seven (87) South Blanco-Pictured Cliffs and Tapacino-Pictured Cliffs Gas Pool wells, and four (4) 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 27-5 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 27-5 Unit;

- c) 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 27-5 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 27-5 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 27-5 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 583 MMCFG and 426 MMCFG, respectively;
- c) the average initial producing rate for a newly drilled or recompleted Dakota and Pictured Cliffs gas well is approximately 393 MCFGD and 63 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 27-5 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 27-5 Unit, the applicant presented engineering evidence and testimony which indicates that:

- a) the average shut-in bottomhole pressure within the Dakota and Picured Cliffs formations at the time of initial development were approximately 3.141 psi and 1.118 psi, respectively; and.
- b) the average current shut-in bottomhole pressure within the Dakota and Picured Cliffs formations are approximately 1.032 psi and 441 psi, respectively.

(10) There is sufficient pressure data available within the San Juan 27-5 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 27-5 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 27-5 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 27-5 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 27-5 Unit every time a Form C-107-A is submitted to the Division. There is a considerable number of such interest owners within the unit;

- c) providing notice to each interest owner within the San Juan 27-5 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 27-5 Unit Area will benefit working, royalty, and overriding royalty interest owners. In addition, the downhole commingling of wells within the San Juan 27-5 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 27-5 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 27-5 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 27-5 Unit, San Juan County New Mexico, is hereby approved.

CASE NO. 11626  
Order No. R-10694  
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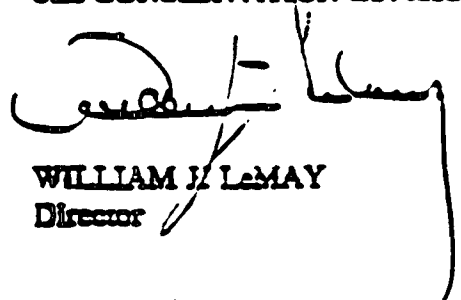
(2) Upon filing of Division Form No. C-107-A's for wells subsequently downhole commingled within the San Juan 27-5 Unit Area, the applicant shall not be required to submit supporting data to justify the classification of the Pictured Cliffs and Dakota formations as "marginal", supporting data to verify 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 27-5 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 27-5 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 H. LEMAY  
Director