ABOVE THIS LINE FOR DIVISION USE ONLY

2637

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

		<u>ADMIN</u>	<u>ISTRA</u>	<u> </u>	PPLICA	<u>ATION</u>	COVE	RSHEET	
	THIS COVERSHE	EET IS MANDATOR	Y FOR ALL AD	MINISTRATIVE A	APPLICATION	IS FOR EXCEP	TIONS TO DIV	ISION RULES AND	REGULATIONS
Applic	PC-P	NSP-Nor DD vnhole Comm ool Comming WFX-Wate SWD-	-Directiona ningling] gling] [O rflood Exp Salt Water	LS - Off-Le ansion] [Disposal]	SD-Single Se Comm ase Stora PMX-Pre: [IPI-In]	multaneou ingling] age] [OL ssure Maii ection Pre	s Dedica [PLC-Poo M-Off-Le ntenance ssure Ind	tion] ol/Lease Com ase Measure Expansion]	ment]
[1]	TYPE OF A	The second secon		eck Those Unit - Di DD			[A]	JAN 28	2000
	Chec [B]	ck One Only Commin X DHC		nd [C] orage - Me PLC	easureme PC	ent OLS	OLM	ONSERVATIO	N DIVISION
	[C]	Injection WFX	- Disposa PMX	ol - Pressur SWD	re Increa	se - Enha EOR	nced Oil PPR	Recovery	
[2]	NOTIFICA [A]			TO: - Che or Overri				r Does Not a	Apply
	[B]	Offset C	perators,	Leasehold	lers or Si	urface Ow	me r		
	[C]	Applica	tion is On	e Which F	Requires	Published	l Legal N	lotice	
·	[D]	•		or Concurr Management -		•			
	[E]	For all o	of the above	ve, Proof o	of Notific	cation or l	Publicati	on is Attache	ed, and/or,
	[F]	Waivers	s are Attac	hed					
[3]	INFORMA	TION / DA	ATA SUB	MITTED	IS CON	MPLETE	- Staten	nent of Under	rstanding

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 ind	ividual with supervisory capacity.	
Peggy Cole	Degay (alo	Regulatory/Compliance Administrator	
Print or Type Name	Signature	Title	Date

1625 N. French Dr., Hobbs, NM 88240 DISTRICT II

811 South First St., Artesia, NM 88210

DISTRICT III

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 Revised March 17, 1999

APPROVAL PROCESS:

_x_Administrative ___Hearing

EXISTING WELLBORE

1000 Rio Brazos Rd, Aztec, NM 87410

DISTRICT IV

2040 S. Pacheco, Santa Fe, NM 87505

APPLICATION FOR DOWNHOLE COMMINGLING

_X_YES ___NO

BURLINGTON RESOURCES OIL & GAS Operator	COMPANY PO Box 4289, Address	Farmington, NM 87499		
SAN JUAN 29-7 UNIT	11A D Well No. Unit Ltr.	03_T29N_07W	RIO ARRIBA	
OGRID NO14538 Property Cod	le7465 API NO	-	acing Unit Lease Types: (check 1 or more)	
The following facts are submitted in support of downhole committigling:	Upper Zone	intermediate Zone	Lower Zone	
Pool Name and Pool Code	BLANCO MESAVERDE - 72319		BASIN DAKOTA - 71599	
Top and Bottom of Pay Section (Perforations)	4854'- 5552'		7417'-7629'	
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 Gas & Oil - Flowing:	a. (Current) 207.1 psia @ 5203'	a.	a. 503.2 @ 7551'	
Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	ь. (Original) 746.4 @ 5203'	b.	b. 1719.6 @ 7551'	
6. Oil Gravity (EAPI) or Gas BTU Content	1343 BTU		1037 BTU	
7. Producing or Shut-In?	PRODUCING		PRODUCING	
Production Marginal? (yes or no)	no) YES YES Date: Date: Date: Date: Rates: Rates: Pate: 1/2000			
If Shut-In, give date and oil/gas/ water rates of last production Note: For new zones with no production history,		Te:		
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	Date: 11/30/99 Rates: 292.2 MCFD, 0 BOPD, 0 BWPD			
8. Fixed Percentage Allocation Formula -% for each zone	Oil: Ges: %	Oil: Gas: %	Oil: Gas: %	
9. If allocation formula is based submit attachments with supp	upon something other than cur	rent or past production, or is be	ased upon some other method,	
Are all working, overriding, and if not, have all working, overriding.			·	
11. Will cross-flow occur? X Y		compatible, will the formations r	not be damaged, will any cross-	
12. Are all produced fluids from al	I commingled zones compatible	e with each other? X_Ye	s No	
13. Will the value of production be			· · ·	
 If this well is on, or communitized United States Bureau of Land 	zed with, state or federal lands, Management has been notified	either the Commissioner of Pulin writing of this application.	blic Lands or the No	
15. NMOCD Reference Cases for F	Rule 303(D) Exceptions: ORDE	R NO(S)R-10697		
16. ATTACHMENTS: * C-102 for each zone * Production curve for * For zones with no period to support allow * Notification list of we have additional states	e to be commingled showing its or each zone for at least one yea oroduction history, estimated procation method or formula. Forking, overriding, and royalty is ements, data, or documents req	s spacing unit and acreage dec ar. (If not available, attach expland oduction rates and supporting interests for uncommon interes juired to support commingling.	lication. anation.) data. t cases.	
I hereby certify that the information	2 2 //			
SIGNATURE Mh	Oll TITLE	Operations Engineer DA	NTE _1-18-00	
TYPE OR PRINT NAME MIKE HA				

1980, Hubbe, NM 88241-1980 District II PO Drawer DD. Artesia. NM 88211-0719 District III 1000 Kie Brams Rd., Aziec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088



Form C-10 Revised February 21, 199 Instructions on bac

OIL CONSERVATION DIVISION Submit to Appropriate District Offic PO Box 2088

State Lease - 4 Copie Fee Lease - J Copie

Santa Fe, NM 87504-2088, 12 PM 1: 119

AMENDED REPOR WELL LOCATION AND ACREAGE DEDICATION PLAT API Number 1 Post Code <u> 30-039-</u> 72319/71599 Blanco Mesaverde/Rasin Dakota ' Property Code Property Name Well Number 11A San Juan 29-7 Unit 7465 OGRID No. Operator Name Eleverion 6250' 14538 MERIDIAN OIL INC. ¹⁰ Surface Location North/South line Feet from the East West Line UL or lot so. Township Range Lot Ida Feet from the County 790 D 3 29N 7W 900 North West R.A. 11 Bottom Hole Location If Different From Surface Feet from the North/South line Feet from the East West line UL or lot se. Section Townsio Range Lot Ida County 13 Dedicated Acres 13 Joint or Infill | 10 Consolidation Code | 15 Order No. W/317.83+W/317.83NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION 52 80.100 17 OPERATOR CERTIFICATION I hereby certify that the information cos true and complete to the best of my knowledge and belief 5 O 7 8 720 NMSF+078945 "SURVEYOR CERTIFICATION I hereby cerufy that the well location shown on this plat 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. 1-5-96 NMSF-1078919 8857

01/10/2000

BURLINGTON RESOURCES OIL & GAS COMPANY DAILY HISTORY REPORT - ESTIMATED PRODUCTION VOLUMES BY WELL FOR MONTH ENDING: 1999-11-30

Pressure Base

3576701

14.73

SAN JUAN 29-7 UNIT 11A MV

	Date	Gas Sales	Net Gas	Est. Oil	Net Oil	Est. Water	
	11/01/1999	379.000	200.130	0.491	0.259	0.000	
	11/02/1999	376.000	198.546	0.491	0.259	0.000	
	11/03/1999	373.000	196.962	0.491	0.259	0.000	
	11/04/1999	373.000	196.962	0.491	0.259	0.000	
	11/05/1999	361.000	190.626	0.491	0.259	0.000	
	11/06/1999	369.000	194.850	0.491	0.259	0.000	
	11/07/1999	369.000	194.850	0.491	0.259	0.000	
	11/08/1999	363.000	191.682	0.491	0.259	0.000	
	11/09/1999	364.000	192.210	0.491	0.259	0.000	
	11/10/1999	359.000	189.570	0.491	0.259	0.000	
	11/11/1999	333.000	175.840	0.491	0.259	0.000	
	11/12/1999	375.000	198.018	0.491	0.259	0.000	
	11/13/1999	372.000	196.434	0.491	0.259	0.000	
	11/14/1999	369.000	194.850	0.491	0.259	0.000	
	11/15/1999	367.000	193.794	0.491	0.259	0.000	
	11/16/1999	367.000	193.794	0.491	0.259	0.000	
	11/17/1999	366.000	193.266	0.491	0.259	0.000	
	11/18/1999	137.000	72.343	0.491	0.259	0.000	
	11/19/1999	42.000	22.178	0.491	0.259	0.000	
	11/20/1999	15.000	7.921	0.491	0.259	0.000	
	11/21/1999	1.000	0.528	0.491	0.259	0.000	
	11/22/1999	375.000	198.018	0.491	0.259	0.000	
	11/23/1999	462.000	243.959	0.491	0.259	0.000	
	11/24/1999	462.000	243.959	0.491	0.259	0.000	
	11/25/1999	62.000	32.739	0.491	0.259	0.000	
	11/26/1999	33.000	17.426	0.491	0.259	0.000	
	11/27/1999	15.000	7.921	0.491	0.259	0.000	
	11/28/1999	15.000	7.921	0.491	0.259	0.000	
	11/29/1999	413.000	218.084	1.430	0.755	0.000	
	11/30/1999	499.000	263.496	1.430	0.755	0.000	
Asset Identifier 3576701		8766.000	4628.877	16.608	8.762	0.000	

292.2 ang Page No: 1

tow003_daily_history_by_asset

01/10/2000

BURLINGTON RESOURCES OIL & GAS COMPANY DAILY HISTORY REPORT - ESTIMATED PRODUCTION VOLUMES BY WELL FOR MONTH ENDING: 1999-11-30

Pressure Base

14.73

SAN JUAN 29-7 UNIT 11A DK

3576702

|--|

tow003_daily_history_by_asset

Page No: 1

81.0 and

San Juan 29-7 Unit #11A Sec. 03, T29N R07W Rio Arriba County, New Mexico

Production Allocation Based On Cumulative Production Through 11/30/99

	Cumulative F	Production	% Allocation				
	MCF	Bbl Oil	% Gas	% Oil			
Mesaverde	292	0	78.30%	0.00%			
Dakota	81	0	21.70%	0.00%			
Total	373	0	100.00%	0.00%			

Gas Allocation: Mesaverde	(Total Mesaverde Production)	292 MCF	78 30%	78
Mesaverue	(Total Combined Production)		70.5070	
Dakota	(Total Dakota Production)	81 MCF	21 70%	22
Danota	(Total Combined Production)		21.7070	`
Oil Allocation:				
Mesaverde	(Total Mesaverde Production)	0 Bbl Oil	0.00%	
	(Total Combined Production)	0 Bbl Oil		
Dakota	(Total Dakota Production)	0 Bbl Oil	0 00%	
	(Total Combined Production)		0.00%	

San Juan 29-7 #11A Bottom Hole Pressures Flowing and Static BHP Cullender and Smith Method

Version 1.0 3/13/94

Mesaverde	Dakota					
MV-Current	<u>DK-Current</u>					
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.15 %CO2 1.03 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) 0.714 M 6.456 60 60 60 60 80 80 80 80 80 8	GAS GRAVITY COND. OR MISC. (C/M) %N2 0.24 %CO2 2.94 %H2S DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 503.2					
MV-Original	<u>DK-Original</u>					
GAS GRAVITY COND. OR MISC. (C/M) %N2 0.15 %CO2 1.03 %H2S 0 DIAMETER (IN) DEPTH (FT) SURFACE TEMPERATURE (DEG F) BOTTOMHOLE TEMPERATURE (DEG F) FLOWRATE (MCFPD) SURFACE PRESSURE (PSIA) BOTTOMHOLE PRESSURE (PSIA) 746.4	GAS GRAVITY COND. OR MISC. (C/M) %N2					

SAN JUAN 29-7 UNIT 11A (DK

AI Number: 3576702

Meter Number: 99327

Sample Date: 19980413

Hydrocarbon Fractions

Mol % C1: 95.89

Mol % C2: 1.45

Mol % C3: 0.24

Mol % iC4: 0.14

Mol % nC4: 0.06

Mol % iC5: 0.06

Mol % nC5: 0.02

Mol % C6: 0

Mol % C6+: 0.09

Mol % C7: 0

Impurities

Mol % H2:0

Mol % He: 0

Mol % N2: 0.1

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 1.95

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1001.283

Dry BTU Factor (BTU/CF at 14.73): 1019

Measured Specific Gravity: 0

Calculated Specific Gravity: 0.591

Sample Date: 19970402

Hydrocarbon Fractions

Mol % C1: 85.76

Mol % C2: 7.03

Mol % C3: 2.89

Mol % iC4: 0.59

Mol % nC4: 0.81

Mol % iC5: 0.31

Mol % nC5: 0.23

Mol % C6: 0

Mol % C6+: 0.62

Mol % C7: 0

Impurities

Mol % H2: 0

Mol % He: 0

Mol % N2: 0.41

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 1.35

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1145.728

Dry BTU Factor (BTU/CF at 14.73): 1166

Measured Specific Gravity: 0

SAN JUAN 29-7 UNIT 11A (DK

AI Number: 3576702

Meter Number: 99327

Sample Date: 19970101

Hydrocarbon Fractions

Mol % C1: 94.92

Mol % C2: 1.74

Mol % C3: 0.36

Mol % iC4: 0.22

Mol % nC4: 0.1

Mol % iC5: 0.11

Mol % nC5: 0.04

Mol % C6: 0

Mol % C6+: 0.36

Mol % C7: 0

Impurities

Mol % H2:0

Mol % He: 0

Mol % N2: 0.29

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 1.86

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1018.97

Dry BTU Factor (BTU/CF at 14.73): 1037

Measured Specific Gravity: 0

SAN JUAN 29-7 UNIT 11A (MV

Al Number: 3576701 Meter

Meter Number: 99328

Sample Date: 19980526

Hydrocarbon Fractions

Mol % C1: 81.64

Mol % C2: 9.56

Mol % C3: 4.27

Mol % iC4: 0.84

Mol % nC4: 1.15

Mol % iC5: 0.43

Mol % nC5: 0.31

Mol % C6: 0

Mol % C6+: 0.62

Mol % C7: 0

Impurities

Mol % H2: 0

Mol % He: 0

Mol % N2: 0.15

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 1.03

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1213.528

Dry BTU Factor (BTU/CF at 14.73): 1235

Measured Specific Gravity: 0

Calculated Specific Gravity: 0.714

Sample Date: 19970402

Hydrocarbon Fractions

Mol % C1: 82.24

Mol % C2: 9.45

Mol % C3: 4.18

Mol % iC4: 0.78

Mol % nC4: 1.07

Mol % iC5: 0.37

Mol % nC5: 0.26

Mol % C6: 0

Mol % C6+: 0.4

Mol % C7: 0

Impurities

Mol % H2: 0

Mol % He: 0

Mol % N2: 0.2

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 1.05

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1192.893

Dry BTU Factor (BTU/CF at 14.73): 1214

Measured Specific Gravity: 0

Al Number: 3576701

Meter Number: 99328

Sample Date: 19970101

Hydrocarbon Fractions

Mol % C1: 78.1

Mol % C2: 9.61

Mol % C3: 4.81

Mol % iC4: 1.13

Mol % nC4: 1.48

Mol % iC5: 0.77

Mol % nC5: 0.64

Mol % C6: 0

Mol % C6+: 2.36

Mol % C7: 0

Impurities

Mol % H2: 0

Mol % He: 0

Mol % N2: 0.17

Mol % O2: 0

Mol % H2S: 0

Mol % CO2: 0.93

Test Pressure: 14.73

Test Temperature: 60

Wet BTU Factor (BTU/CF at 14.73): 1319.65

Dry BTU Factor (BTU/CF at 14.73): 1343

Measured Specific Gravity: 0

30-039-25564

STATE OF NEW MEXICO ENERGY and MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

Page 1 Revised 10/01/78

This form is not to be used for reporting packer leakage tests in Southeast New Mexico

NORTHWEST NEW MEXICO PACKER-LEAKAGE TEST

Operator B	BURLING:	TON	RESOURC	ES OIL & C	GAS CO.		Lease	SAN JUAN 29-	7 UNIT		Well No.	11A
Location												
of Well:	Unit	<u>D</u>	Sect	03	Twp.	029N	Rge.	007VV	County	RIO ARRIBA		
			NAME OF	RESERVO	IR OR POOI	L	T	YPE OF PROD.		IOD OF PROD.		OD, MEDIUM
							-	(Oil or Gas)	(Flo	w or Art. Lift)	(Tbg. or Csg.)
Upper Completion	MESA	VER)E			,		Gas		Artificial		Tubing
Lower Completion	DAKO	TA						Gas		Flow		Tubing
					PRE-I	FLOW SHUT-IN	PRESS	URE DATA				
Upper	Hour, o	late sh	ut-in	Length	of time shut-	in	SI pı	ress. psig		Stabilized? (Ye	es or No)	
Completion	C	06/11/	1999		120 Ho	urs		182				
Lower Completion	C	06/11/	1999		72 Hou	urs		430				
						FLOW TES	ST NO.	1				
Commenced	at (hour,d	ate)*		-	06/14/1999			Zone producing (Upper or l	Lower) LO	WER	
TIME	LA		TIME			SSURE		PROD. ZONE				
(hour,date)		SINC	E*	Upper C	ompletion	Lower Compl	etion	tion TEMP		REMARKS		
6/15/199	6/15/199 96 Hours		1	82	143		open for flow		for flow			
6/16/199	•	120 F	ours	1	83	142						
Production rate	during tes	st										
Oil:		BOPE	based on		Bbls. ii	n	Hours.		Grav		GOF	L
Gas:				MCFPD;	Γested thru (Orifice or Meter):	:					
					MID-	TEST SHUT-IN	PRESSI	LIRE DATA				
Upper	Hour,	late sh	ut-in	Length	of time shut-			ress. psig		Stabilized? (Y	es or No	
Completion				Longui	or thine bilde			reas, parg		Stabilized! (1)	ca OI INO,	1
Lower Completion	Hour,	date sh	ut-in	Length	of time shut-	in	SI pr	ress. psig		Stabilized? (Y	es or No)

(Continue on reverse side)

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;
 - 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 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

S E A L