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W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

October 17, 1994

17 1994

HAND DELIVERED

Mr. Michael E. Stogner
Chief Hearing Examiner
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

1113/0

Re: Garrett Com Well No. 1, J-12-29N-11W
Application of Meridian Oil Inc.
for downhole commingling and an
unorthodox coal-gas well location,
San Juan County, New Mexico

Dear Mr. Stogner:

On behalf of Meridian Oil Inc., please find enclosed our referenced application which we request be set for hearing on the next available Examiner's docket now scheduled for November 10, 1994.

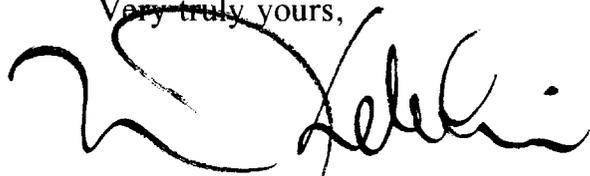
By copy of this letter and application, sent certified mail, we are notifying all interested parties of their right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the application and that failure to appear at the hearing may preclude them from any involvement in this case at a later date.

Oil Conservation Division
October 17, 1994
Page Two

Pursuant to the Division's Memorandum 2-90, all parties are hereby informed that if they appear in this case, then they are requested to file a Pre-Hearing Statement with the Division not later than 4:00 PM on Friday, November 4, 1994, with a copy delivered to the undersigned.

Also enclosed is our proposed advertisement of this case for the NMOCD docket.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written in a cursive style.

W. Thomas Kellahin

WTK/wtk
Enclosure

cc: Meridian Oil Inc. and
By Certified Mail - Return Receipt
All Interested Parties

PROPOSED ADVERTISEMENT

Case 7740: Application of Meridian Oil Inc. for downhole commingling and an unorthodox coal-gas well location, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks approval to downhole commingle Aztec-Pictured Cliffs Gas Pool (SE/4 dedication) with the Basin-Fruitland Coal Gas Pool production (E/2 dedication) within the wellbore of its Garrett Com Well No. 1 located 1650 feet from the South line and 1650 feet from the East line (Unit J) of Section 12, T29N, R11W, NMPM, at an unorthodox "off-pattern" coal-gas well location. Said well is located approximately 2 miles northeast of Bloomfield, New Mexico.

*Standard
640 ac
Section*

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:

APPLICATION OF MERIDIAN OIL INC.
FOR DOWNHOLE COMMINGLING AND AN
UNORTHODOX COAL-GAS WELL LOCATION,
SAN JUAN COUNTY, NEW MEXICO.

CASE: 11140

APPLICATION

Comes now MERIDIAN OIL INC., ("Meridian") by and through its attorneys, Kellahin and Kellahin, and applies to the New Mexico Oil Conservation Division for approval to downhole commingle Aztec-Pictured Cliffs Gas Pool (SE/4 dedication) with the Basin-Fruitland Coal Gas Pool production (E/2 dedication) within the wellbore of its Garrett Com Well No. 1 located 1650 feet from the South line and 1650 feet from the East line (Unit J) of Section 12, T29N, R11W, NMPM and for an unorthodox coal gas "off-pattern" well location.

In support of its application, Meridian states:

(1) Meridian is the operator of the Garrett Com Well No. 1 in Section 12, T29N, R11W, NMPM, San Juan County, New Mexico which currently is a single completion well in the Aztec-Pictured Cliffs Gas Pool. See Exhibit "A" attached.

(2) The well is to be recompleted so that production from the Basin-Fruitland Coal Gas Pool and the Pictured Cliffs formation can be downhole commingled in the wellbore.

(3) In addition, Meridian has selected to recomplete its Garrett Com Well No. 1 at an unorthodox "off pattern" coal gas well location in order to downhole commingle that production with the Pictured Cliffs production in order to recover marginal Pictured Cliffs gas reserves located in the SE/4 of Section 12.

(4) The ownership is not common for the well and its respective spacing and proration units in both pools.

(5) In accordance with Division Rule 303-C-1.(b), the Applicant states and will demonstrate at hearing:

1. the downhole commingling in this wellbore is necessary because evidence indicates that the Pictured Cliffs formation in this area of the San Juan Basin should be marginally productive and that due to the marginal production expected, it is uneconomic to drill a stand alone Pictured Cliffs Well. In addition, it is not economic to attempt to dually complete those formations in this well;

2. there will be no crossflow between the two zones commingled;

3. neither commingled zones exposes the other to damage by produced liquids;

4. the fluids from each zone are compatible with the other;

5. it is expected that the bottom hole pressure of the lower pressure zone is not less than 50 percent of the bottom hole pressure of the higher pressure zone adjusted to a common datum.

6. the value of the commingled production will not be less than the sum of the values of the individual production.

(6) The proposed downhole commingling is necessary in order for the applicant to economically recover Basin-Fruitland Coal Gas and Pictured Cliffs Gas Pool reserves underlying each respective proration unit.

(7) Due to the nature of the Basin-Fruitland Coal Gas production, straight allocation of gas volumes from both zones is not appropriate. Meridian therefore seeks the adoption of a monthly allocation formula to be presented at the time of the hearing.

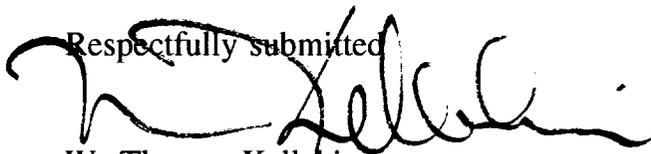
(8) Applicant requests that this matter be docketed for hearing on the Division's Examiner docket now scheduled for November 10, 1994.

(9) A copy of this application is being sent to all owners of production within the respective spacing unit for the well who may be affected by downhole commingling.

(10) Copy of this application has been sent to all offsetting operators to the two spacing units for the well.

WHEREFORE Applicant requests that this matter be set for hearing on November 10, 1994 before a duly appointed Examiner of the Oil Conservation Division and that after notice and hearing as required by law, the Division enter its order granting this application.

Respectfully submitted

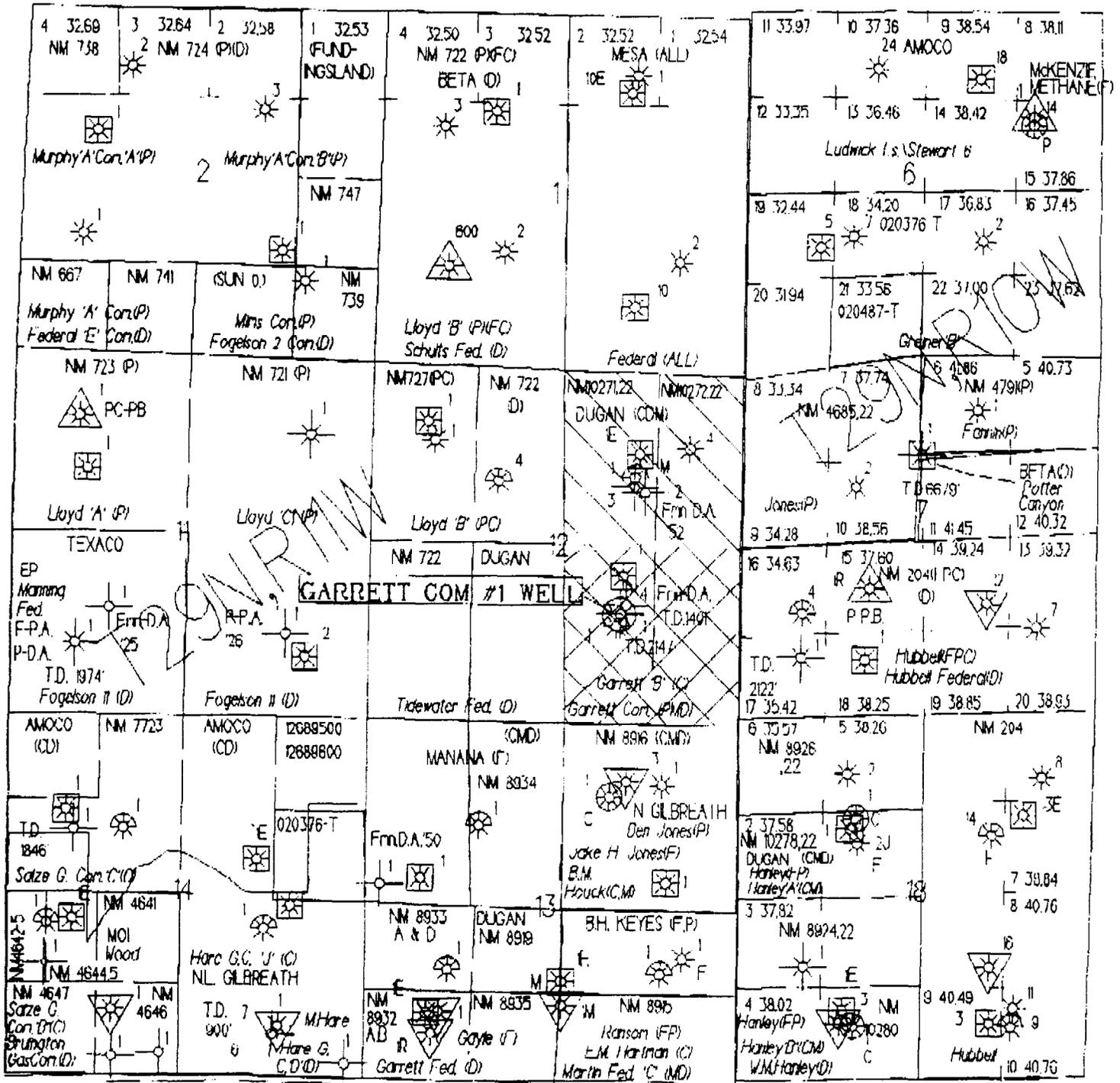


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Santa Fe, New Mexico 87501
(505) 982-4285
Attorneys for Applicant

GARRETT COM #1 WELL

UNIT J, SECTION 12, T29N, R11W

SAN JUAN CO, NEW MEXICO



- | | | | | | |
|--|----------------------|--|----------------|--|------------------------------|
| | FRUITLAND SAND WELL | | MESAVERDE WELL | | PICTURED CLIFFS SPACING UNIT |
| | FRUITLAND COAL WELL | | DAKOTA WELL | | FRUITLAND COAL SPACING UNIT |
| | PICTURED CLIFFS WELL | | GALLUP WELL | | |

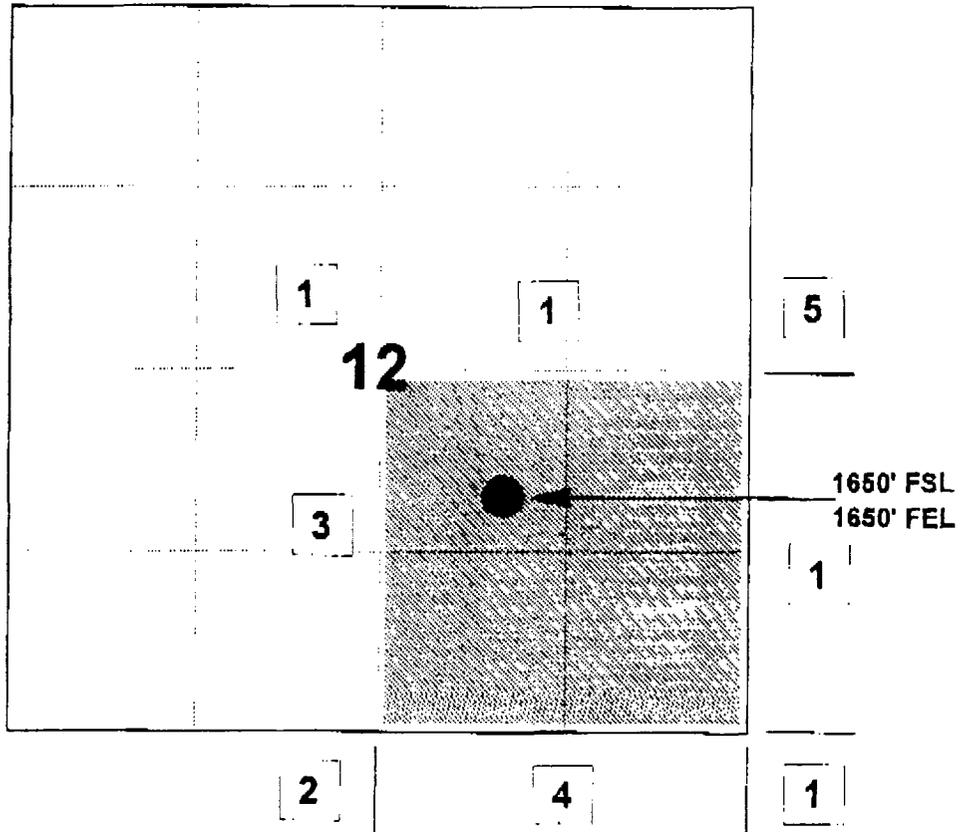
MERIDIAN OIL INC

GARRETT COM 1

OFFSET OPERATOR \ OWNER PLAT

Fruitland Coal / Pictured Cliffs Formations Commingle Well

Township 29 North, Range 11 West



1) Meridian Oil Inc	
2) Texaco Exploration & Production, Inc.	PO Box 2100, Denver, CO 80201
3) Meridian Oil Inc & Dugan Production Corporation	PO Box 420, Farmington, NM 87499
Texaco Exploration & Production, Inc.	PO Box 2100, Denver, CO 80201
4) Norman L Gilbreath	PO Box 208, Aztec, NM 87410
5) Meridian Oil Inc & Helen Harvey Hedrick	PO Box 2185, Santa Fe, NM 87501

Pictured Cliffs Formation

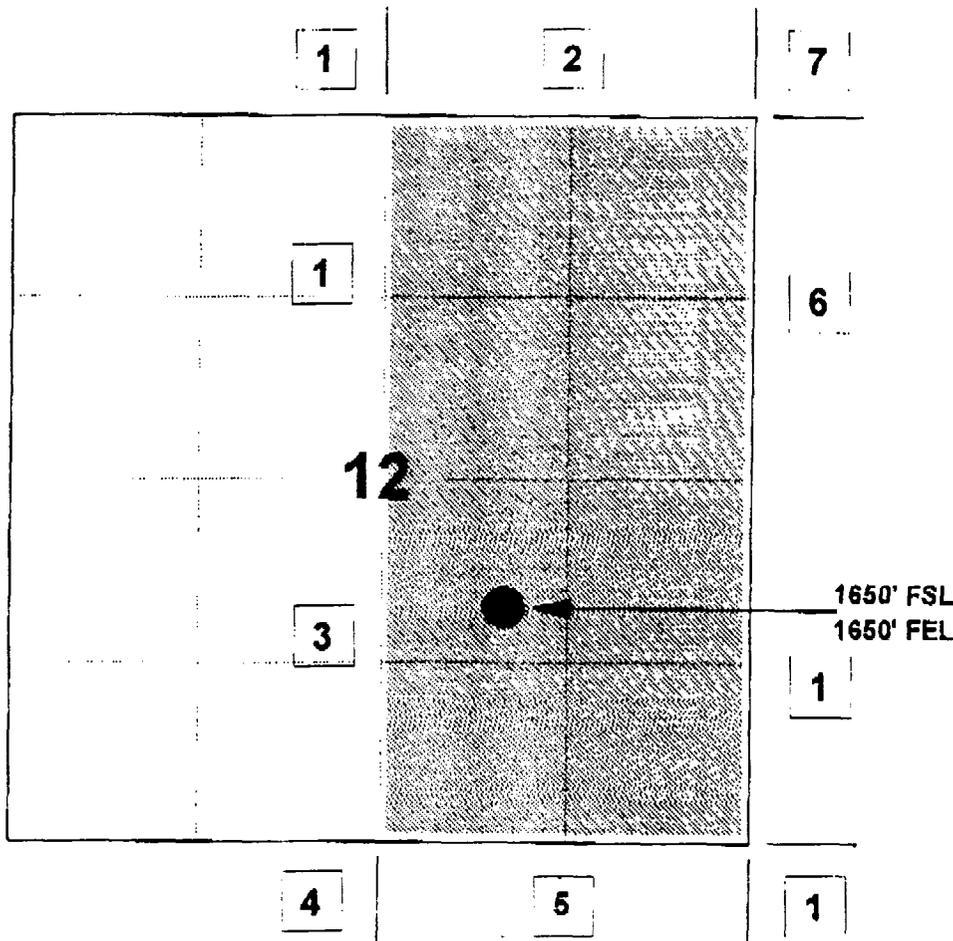
MERIDIAN OIL INC

GARRETT COM 1

OFFSET OPERATOR \ OWNER PLAT

Fruitland Coal / Pictured Cliffs Formations Commingle Well

Township 29 North, Range 11 West



- 1) Meridian Oil Inc

- 2) Meridian Oil Inc &
Conoco, Inc. 10 Desta Drive, Suite 100W, Midland, TX 79706

- 3) Meridian Oil Inc &
Dugan Production Corporation PO Box 420, Farmington, NM 87499
Texaco Exploration & Production, Inc. PO Box 2100, Denver, CO 80201

- 4) Manana Gas Inc. 1002 Tramway Lane NE, Albuquerque, NM 97122

- 5) Norman L Gilbreath PO Box 208, Aztec, NM 87410
Roddy Production Company, Inc. PO Box 2221, Farmington, NM 87499

- 6) Meridian Oil Inc &
Helen Harvey Hedrick PO Box 2185, Santa Fe, NM 87501

- 7) Meridian Oil Inc &
Quintana Petroleum Services, Inc. PO Box 3331, Houston, TX 77253