

Raton Basin Coal Bed Methane Completion Policy

Raton, Raton/Vermejo, Raton Sand formations

It is considered that the Vermejo coals and the Raton coals are a common source of supply; therefore, when the formations are commingled they will not require allocated production reporting for the individual formations. Though the formations are considered a common source of supply the COGCC will approve separate wells to the Raton and Vermejo formations. This is approved because in some areas it is a better practice not to commingle these formations because of geological differences. The COGCC encourages twinning of wells in these circumstances to reduce surface impact.

On occasion the lower most coals in the Raton are more characteristic of the Vermejo Coals and it is a better practice for them to be completed in the Vermejo well. The COGCC will approve twin wellbores with Raton completions provided that a geological exception is requested, and the correlative zones are completed in only one of the two wellbores (perforated zones must be different). These perforated zones will both be reported as Raton Coal for production purposes.

The Raton Sand and Raton Coals are to be considered as separate geologic intervals. Production from the Raton Sand shall be considered as conventional gas and not coal bed methane. Twinning of wells in the Raton sand and Raton Coals shall not be an exception location.