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De: George Baker <g.baker@energia.com>
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Para: Cofemer Cofemer
Asunto: mirs/43548 - Comments regarding the definition of unitization -
Datos adjuntos: Table 1 - Unitization 2014-17.pdf

Marca de seguimiento: Seguimiento
Estado de marca: Marcado

Houston, November 2, 2017

Re: mirs/43548

These successive definitions are imperfect, for these two reasons:

- 1) It's not the raw geological facts that can determine whether to or more leases should be unitized (migrated, in Mexican terms) to another legal figure. What matters is the estimated economic recovery of the fields, a matter that is best done with a reservoir simulator that takes into account both geological, geophysical and economic and market data.
- 2) There has to be economic justification: the extension of 1% of a reservoir from one lease block to another should not compel unitization on the basis of geology, a consideration not explicitly given in SENER's draft guidelines.

Were the lease owner of the 1% start a drilling and development program on the 1%, at that point the 99% owner might request unitization.

George Baker
Mexico Energy Intelligence



"AÑO DEL CENTENARIO DE LA PROMULGACIÓN DE LA CONSTITUCIÓN POLÍTICA DE LOS ESTADOS UNIDOS MEXICANOS" "La información de este correo así como la contenida en los documentos que se adjuntan, puede ser objeto de solicitudes de acceso a la información"



Table 1

Unitization in Mexican law and policy
Long vetting process

2014

AUG 11, 2014

Hydrocarbon Law (Article 42.II)

II. To instruct the unitization of fields or reservoirs based on the opinion issued by the National Hydrocarbons Commission. The above for national reservoirs and, in terms of international treaties, for cross-border ones, ... [The term "unificación" is not defined.]

OCT 31, 2014

Regulations of the Hydrocarbon Law (Arts. 62-64)

Article 63.- Once the notice referred to in the previous article has been received, the Secretariat, based on the information received, as well as on the opinion of the Commission, will determine the possible existence of a shared field or field, in which case will instruct the unification of the extraction fields or reservoirs. [The term "Unificación" is not defined.]

2015

NOV 13, 2015

CNH guidelines for presentation of exploration and development proposals

"Unificación" - Actions regarding a Field, Reservoir or installation shared or susceptible to share, instructed by the Secretariat, after the Commission's Opinion, to make the Exploration and Extraction processes more efficient, being distributed among the participating Oil Operators, in the corresponding proportion, the disbursements made and the benefits obtained.

2017

MAR 01, 2017

SENER publishes a Guide (Guia) regarding unitization (7 pages)

"Unificación": The process by which the Secretariat, following the opinion of the Commission, determines the possible existence of a Shared Field or Reservoir, in order to make the Exploration and Extraction activities more efficient through a Unification Agreement, ...

OCT 12, 2017

SENER draft guidelines posted online by COFEMER for public comment (46 pages)

Art. 2.XXVI. "Unificación": The instruction issued by the Secretariat to the Assignees and / or Contractors, following the opinion of the Commission, and when the existence of a Shared Reservoir has been determined in their Areas of Assignment or Contractual Areas.

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