Submit 3 Copies to Appropriate District	State of 1	New Mex	ico				Form C-	103
Office District I	Energy, Minerals a	and Natur	al Resources			Revised	l March 25,	1999
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District III	2040 So	uth Pache	co		TATE	FEE		ŀ
1000 Rio Brazos Rd. Aztec, NM 87410 District IV	Santa Fe.	NM 875	505	4	State Oil 8	& Gas Lease	No	
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## RICHARDSON OPERATING COMPANY Pittam Pond #1 COMMINGLE APPLICATION

The Pittman Pond #1 well was originally completed in the Gallup formation January 14, 1983. The well was plugged back and recompleted in the Pictures Cliffs formation on July 15, 1999. The well was tested at 89 mcfpd from the Pictured Cliffs and was shut in due to no gas pipeline. On February 21, 2000 a cast iron bridge plug was set above the Pictured Cliffs and the Fruitland Coal was completed. The Fruitland Coal was tested at 10 mcfpd and 450 bbls of water per day on March 24, 2000. In June 2000 the well produced an average rate of 21 mcfpd.

The closest producing Pictured Cliffs and Fruitland Coal well is Richardson's Bushman Federal #6-1 well (Unit P, Sec. 6, T29N, R14W) which was approved for downhole commingling of the Fruitland Coal and Pictured Cliffs formations in OCD Order R-10810.

Based upon recent Richardson Operating wells completed in this area, it is anticipated that both zones will have similar bottom hole pressures. At this shallow depth, bottom hole pressures average 200 psi. Both zones produce water but no liquid hydrocarbons. Neither zone is fluid sensitive and fluid from the two zones are compatible.

Since neither zone has enough long term stabilized production data to prepare a reliable production forecast or predict the ultimate recoverable gas reserves, Richardson Operating proposes to allocate the production based upon the initial production rates from the Pictured Cliffs formation of 89 mcfpd. The Pictured Cliffs is not producing and is still under a cast iron bridge plug. Upon receipt of approval by the NMOCD to commingle production, the cast iron bridge plug will be drilled and production from the Pictured Cliffs will be commingled with the Fruitland Coal. The daily production of 89 mcpfd from the Pictured Cliffs will be used as a baseline for the well with initial incremental production over 89 mcfpd attributed to the Fruitland Coal. Therefore Fruitland Coal production shall initially be calculated as total daily gas production less 89 mcfpd used for the Pictured Cliffs baseline.

Thereafter, assuming a 7% decline rate from the Pictured Cliffs, the allocation formula is as follows:

**Pictured Cliffs Production** = Pictured Cliffs base rate  $x e^{(-Dt)}$ , where D = 7%/yr and t = time in years since first production.

Fruitland Coal Production = Total Production - Pictured Cliffs production.