

- 1) Request for allowable for newly drilled or deepened well must be accompanied by tabulation of deviation tests taken in accordance with Rule 111.
- 2) All sections of this form must be filled out for allowable on new and recompleted wells.
- 3) Fill out only Sections I, II, III, and VI for changes of operator, well name or number, transporter, or other such changes.
- 4) Separate Form C-104 must be filed for each pool in multiply completed wells.

RICHARDSON OPERATING COMPANY

309 West First Avenue P.O. Box 9808
Denver, Colorado 80209 (303) 698-9000
FAX (303) 777-0607

April 13, 1993

New Mexico Oil Conservation Division
1000 Rio Brazo Rd.
Aztec, NM 87410

Attn: Ernie Busch

VIA FAX: 505-334-6170 Two Pages total

Dear Mr. Busch:

The enclosed letter from Duane Spencer at the BLM indicates that they see no reason to hold up production from the listed wells strictly on the basis of lack of Communitization Agreements.

A recently received memo from Dorothy of your office indicates that the C104s are being held pending finalization of the Communitization Agreements.

Communitization Agreements are executed to protect the interest of the mineral owners under the spacing unit. Inasmuch as the primary mineral owner does not object to the wells being produced pending the completion of Communitization Agreements, we respectfully request that any requirement to obtain such agreements be suspended until we can obtain the same.

We would appreciate whatever steps you might take to allow us to turn these wells on.

Sincerely,



Peter A. Gowan
Land Manager

RECEIVED
APR 13 1993
OIL CON. DIV.
DIST. 3



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Farmington District Office
1235 La Plata Highway
Farmington, New Mexico 87401

APR. 05 1993

TAKE
PRIDE IN
AMERICA

IN REPLY REFER TO:
3105 (070)

Richardson Operating Company
ATTN: Peter Gowan
P.O. Box 9808
Denver, CO 80209

Dear Mr. Gowan:

On March 31, 1993 our office received a letter from Richardson Operating Company stating they were in the process of preparing and obtaining signatures for Communitization Agreements (CAs) covering seven wells located in T. 29 N., R. 12 W., San Juan County, New Mexico. Our office is aware of the lengthy process that occurs in getting Communitization Agreements executed. Since you have informed us that you are doing everything possible to submit these CAs in a timely manner, and since the CA effective dates will be date of first production or earlier, we have no objection to these wells being hooked up and gas production being sold.

The wells being referenced are the following:

Well Name & Number	Formation	Well Location	Spacing
Federal 5-1	Fruitland Coal	NE $\frac{1}{4}$ NE $\frac{1}{4}$, Sec. 5	N $\frac{1}{2}$
Ropco Fee 5-2	Fruitland Coal	NE$\frac{1}{4}$SW$\frac{1}{4}$, Sec. 5	S$\frac{1}{2}$
Ropco Fee 7-1	Fruitland Coal	NW $\frac{1}{4}$ SW $\frac{1}{4}$, Sec. 7	W $\frac{1}{2}$
Federal 9-1	Fruitland Coal	SE $\frac{1}{4}$ SW $\frac{1}{4}$, Sec. 9	W $\frac{1}{2}$
Ropco Fee 9-2	Fruitland Coal	NE $\frac{1}{4}$ NE $\frac{1}{4}$, Sec. 9	E $\frac{1}{2}$
Ropco Fee 15-1	Fruitland Coal	SE $\frac{1}{4}$ SW $\frac{1}{4}$, Sec. 15	S $\frac{1}{2}$
Ropco Fee 15-2	Fruitland Coal	SW $\frac{1}{4}$ NE $\frac{1}{4}$, Sec. 15	N $\frac{1}{2}$

Copies of this letter are being distributed to the appropriate agencies. If you have any questions please contact Janice Easley at (505) 599-8963.

Sincerely,

Duane W. Spencer
Chief, Branch of Reservoir Mgmt.

cc:
NMOCD
1000 Rio Brazos Road
Aztec, NM 87410