*IED STATES* Form 3166 FORM APPROVED DEPARTMENT OF THE INTERIOR (June, 1990 Budget Bureau No. 1004-0135 **BUREAU OF LAND MANAGEMENT** Expires: March 31, 1993 onation and Seriel No SUNDRY NOTICES AND REPORTS ON WELLS 14-20-603-2168A Do not use this form for proposals to drill, or to deepen or reentry to audifferent reservoir. 6. If Indian, Allotte or Tribe Name Use "APPLICATION FOR PERMIT-" for such proposals Navajo SUBMIT IN TRIPLICATE 7. If Unit or CA, Agreement Designation 1. Type of Well Oil Wall Gas Well B. Well Name and No. 2. Name of Operator Navajo 28-1 Richardson Operating Company 9. API Well No. 3. Address and Telephone No. 30-045-30221 1700 Lincoln, Suite 1700, Denver, Colorado 80203 (303) 830-8000 10. Field and Pool, or Exploratory Area 4. Location of Well (Footage, T, R, M, or Survey Description) Basin FC/W Kutz PC Ext. 1570'FNL, 1465'FEL 11. County or Parish, State 28-29N-14W San Juan County, NM CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA 12. TYPE OF SUBMISSION TYPE OF ACTION Abandonment Change of Plans Notice of Intent Recompletion New Construction Plugging Back Non-Routine Fracturing Casing Repair Water Shut-Off Alterina Casina Conversion to Injection Final Abandonment Notice Surface Casing/Cementing Dispose Water Other: see below (Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form) 13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markets and zones pertinent to this work.)\* Pursuant to New Mexico Oil Conservation Division Order R-11224, Richardson Operating Company seeks permission to downhole commingle the Basin Fruitland Coal (71629) and West Kutz Pictured Cliffs Ext. (79680) pools. The Basin Fruitland Coal formation is estimated to be perforated at 897'-904', 927'-932', 1001'-1018' and the West Kutz Pictured Cliffs Ext. formation is estimated to be perforated at 1022'-1030'. Refer to the attached Technical Write-up for the allocation method and supporting data. The downhole commingling will not reduce the value of the total remaining production of this well. The ownership between the two pools is identical. Richardson Operating Company has sent a like Sundry Notice to the OCD (Form C-103) setting out our intention to downhole commingle this well. Signed: Title: Land Manager July 17, 2000 Date: Conditions of approval, if any

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent

statements or representations as to any matter within its jurisdiction.

## Richardson Operating Company Navajo #28-1 Commingling Application

The Navajo #28-1 is a newly drilled Basin Fruitland Coal/West Kutz Pictured Cliffs well. There are no other Pictured Cliffs and Fruitland Coal wells in this section. The closest producing Fruitland Coal and Pictured Cliffs well is Richardson's Navajo Tribal H 5 (Unit M, Sec. 13, T29N, R14W) which was approved for downhole commingling of the Fruitland Coal and Pictured Cliffs formations in Administrative Order DHC-2478.

Based on recent Richardson Operating wells in this township, it is anticipated that both zones will have similar bottom hole pressures of approximately 200 psi. Both zones produce some water and no liquid hydrocarbons. Neither zone is fluid sensitive and fluids from the two zones are compatible.

Since neither zone has enough data to prepare a reliable production forecast, or predict the ultimate reserves, Richardson Operating proposes to allocate the production based on the initial production rates from the Pictured Cliffs. The well will be perforated and stimulated in the Pictured Cliffs formation. The stimulation will then be cleaned up and the well flow tested. The production based on the flow test will establish the Pictured Cliffs base rate. The Fruitland Coal formation will be completed separately but it will be produced with the Pictured Cliffs. The Fruitland Coal production will be the total measured production minus the Pictured Cliffs production.

We propose using the same allocation formula that was approved for the Navajo Tribal H 5 well, therefore, assuming an 18% decline rate from the Pictured Cliffs, the proposed allocation formula is as follows:

**Pictured Cliffs Production** = Pictured Cliffs base rate  $x e^{(-Dt)}$ , where D = 18%/yr and t = time in vears since first production.

Fruitland Coal Production = Total Production – Pictured Cliffs production.