Form 3160-5 (June 1990)

1. Type of Well

Wel

3. Address and Telephone No.

2. Name of Operator

Gas

UNITED STATES DEPARTMENT OF THE INTERIOR **BUREAU OF LAND MANAGEMENT** 5. Lease Designation and Senal No NMSF 079968 SUNDRY NOTICES AND REPORTS ON WELLS 6. If Indian, Allottee or Tribe Name Do not use this form for proposals to drill or to deepen or reentry to a different reservoir. Use "APPLICATION FOR PERMIT-" for such proposals 7. If Unit or CA, Agreement Designation SUBMIT IN TRIPLICATE 8. Well Name and No. Other ROPCO 9 No.1 9. API Well No. Richardson Operating Company 30-045-30383 (505) 564 10. Field and Pool, or Exploratory Area ONS. DN DIST. 3 11. County or Parish, State San Juan, NM

3100 LaPlata Hwy. Farmington, NM 87401 4. Location of Well (Footage, Sec., T., R., M., or Survey Description Basin FC/Twin Mounds FS-835' FNL & 860' FEL, Sec 9, T29N, R14W, NMPM CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA 12. TYPE OF ACTION TYPE OF SUBMISSION Change of Plans Abandonment **New Construction** Recompletion Notice of Intent Non-Routine Fracturing Plugging Back Subsequent Report Water Shut-Off Casing Repair Conversion to Injection Altering Casing Final Abandonment Notice Other Copy: OCD DHC Application Dispose Water 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 markers and zones pertinent to this work.) Richardson Operating Company proposes to downhole commingle the Basin Fruitland Coal and Twi: Mounds Fruitland Sand - PC in this well. Attached is a copy of their application to downhole commingle these "pre-approved pools", as per NMOCD Rule 303C(3)(b)(vii).

14. I hereby certify the foregoing is true and correct Title Agent (This space for Federal or State office use) 181 Jim I Approved by Conditions of approval, if any

CONDITIONS OF APPROVAL Adhere to previously issued stipulations.

OIL CONSERVATION DIVISION

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Indicate Type of Lease	_	

OIL CONSER VATION DIVISION OIL CONSER VATION DIVISION P.O. Box 1980, Hobbs, NM 88240 P.O. Box 2088	WELL API NO. 30-045-30383	
Santa Fe, New Mexico 87504-2088 P.O. Drawer DD Artesia, NM 88210	5. Indicate Type of Lease STATE FEE	
DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410	6. State Oil & Gas Lease No. Federal NMSF 079968	
SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	TO A 7. Lease Name or Unit Agreement Name ROPCO 9	
1. Type of Well: OIL WELL GAS WELL OTHER		
2. Name of Operator Richardson Operating Company	8. Well No.	
3. Address of Operator 3100 LaPlata Highway, Farmington, NM 87401	9. Pool name or Wildcat Basin FC/Twin Mounds FS - PC	
4. Well Location Unit Letter A : 835 Feet From The North Line and	d 860 Feet From The East Lin	
Section 9 Township 29N Range 14W	NMPM San Juan County	
10. Elevation (Show whether DF,RKB,RT,GR,o 5240' UG	etc.)	
Check Appropriate Box to Indicate Nature of Noti NOTICE OF INTENTION TO:	ce, Report, or Other Data SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK PLUG AND ABANDON REMEDIAL V	WORK ALTERING CASING	
TEMPORARILY ABANDON CHANGE PLANS COMMENCE	COMMENCE DRILLING OPNS. DLUG AND ABANDONMENT	
PULL OR ALTER CASING CASING TES	CASING TEST AND CEMENT JOB	
OTHER: Downhole Commingling Application OTHER:		
12. Describe Proposed or Completed Operations. (Clearly state all pertinent details, and give pertinent SEE RULE 1103.		
Richardson Operating Company proposes to downhole commingle the Mounds Fruitland Sand - PC in this well. Please see the attache these "pre-approved" pools.	e Basin Fruitland Coal and the Twin ed for details on downhole commingling	
Your consideration and approval of this application is apprecia	ited.	

I hereby certify that the information above is true and complete	e to the best of my knowledge and belief.	
SIGNATURE James Kerley	TITLE Agent	DATE 12/50/02
TYPE OR PRINT NAME Charles Neeley		TELEPHONE NO. 505-486-0211
(This space for State Use)	· ·	
ADDDOVED BY	TITLE	DATE

Richardson Operating Company ROPCO 9-1 API No. 30-045-30383 835' FNL & 860' FEL Sec 9, T29N, R14W, NMPM San Juan County, New Mexico

Down-hole Commingling Application (Details)

The Navajo 9-1 is a recently drilled Twin Mounds Fruitland Sand – PC / Basin Fruitland Coal well.

Pursuant to Order R-11363, Richardson Operating Company seeks approval to downhole commingle the "Pre-approved pools and areas": Basin Fruitland Coal (71629) and the Twin Mounds Fruitland Sand – PC (86620) pools in this well.

The Twin Mounds Fruitland Sand - PC formation is perforated at 888' - 898' in this well. Basin Fruitland Coal formation perforate: 865' - 887'.

Due to the intermingled nature of the pools and since neither pool has enough data to prepare a reliable production forecast or predict the ultimate reserves; therefore, based on production from wells in this Township and wells in Sections 32 & 33 or T30N, R14W, Richardson will allocate the production as follows:

<u>FS - PC Production</u> = 0.51 x Total Production. Fruitland Coal Production = 0.49 x Total Production.

* The data used and the corresponding calculations are attached for reference.

The down-hole commingling will not reduce the value of the total remaining production of this well.

Ownership between the two pools is not identical.

Richardson Operating Company has sent notice to all interest owners in the spacing units by certified mail (return receipt) of their intent to apply for down-hole commingling. No objection was received within 20 days of sending the notice.

A copy of this application has been submitted via Sundry Notice Form 3160-5 to the Bureau of Land Management.

Your consideration and approval of this application is appreciated.

Richardson Operating Company

Downhole Commingling Allocation Methodology

This document describes the methodology used in determining the allocation between the proposed pools to be commingled in the ROPCO 9-1 well. Production data was obtained from the On-Gard system when possible. The POPCO 4 #3 data was obtained using current production for Richardson Operating Company files. For consistency the average production from the wells was calculated by using a minimum of 6 months of initial production in the well. This average should represent the initial potential of the well. Data was gathered for Section 4, T29N, R14W and the eight adjacent sections.

The data from four sections did not provide a reliable correlation to determine the allocation: Section 34, T29N R14W, Section 5, Section 8, and Section 9 T29N R14W.

Section 32 T30N R14W:

Comm. avg. = 425 PC avg. = 180

Section 32 T30N R1	4W :	
Fruitland Coal:	Dugan Bi Knobs Com 90	23 Mcf/day
	Dugan Bi Knobs 91	75 Mcf/day
Pictured Cliffs:	Dugan Bi Knobs 1	52 Mcf/day
	Dugan Bi Knobs 2R	104 Mcf/day
	Richardson WF State 32-1	42 Mcf/day
FC avg. = 49		
PC avg. = 66	Section 32 allocation = 43% FC, 57% PC	
Section 33 T30N R1	4W :	
Fruitland Coal:	Richardson WF Federal 33-1	203 Mcf/day
Pictured Cliffs:	Dugan Cline #1R	75 Mcf/day
	Richardson WF Federal 33 #3	555 Mcf/day
FC avg. = 203		
PC avg. = 315	Section 33 allocation = 39% FC, 61% PC	
Section 4 T29N R14	W:	
Commingled FC/PC:	Richardson Ropco 4 #3	425 Mcf/day
Pictured Cliffs:	Richardson Ropco 4 #2	231 Mcf/day
	Richardson Ropco 4 #4	129 Mcf/day

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Section 4 allocation = 57% FC, 43% PC

Richardson Operating Company Downhole Commingling Allocation Methodology (Continued) Page 2

Section 3 T29N R14W:

Fruitland Coal: Dugan Federal 1 #99 187Mcf/day

Richardson WF Federal 3 #2 160 Mcf/day

Pictured Cliffs: Dugan Federal 1 #7 266 Mcf/day

Richardson WF Federal 3 #1 128 Mcf/day

FC avg. = 174

PC avg. = 160 Section 3 allocation = 47% FC, 53% PC

Section 10 T29N R14W:

Fruitland Coal: Dugan Federal 1 #98 165 Mcf/day

Pictured Cliffs: Richardson Ropco 10 #2 115 Mcf/day

FC avg. = 165

PC avg. = 115 Section 10 allocation = 59% FC, 41% PC

Summary:

Section 32 allocation = 43% FC, 57% PC

Section 33 allocation = 39% FC, 61% PC

Section 4 allocation = 57% FC, 43% PC

Section 3 allocation = 47% FC, 53% PC

Section 10 allocation = 59% FC, 41% PC

AVERAGE = 49% FC, 51% PC

The proposed allocation for the ROPCO 9 No.1 will be 49% Fruitland Coal and 51% Pictured Cliffs.

Conditions of Approval:

Notice of Intent: Down hole commingle

Richardson Operating Company Ropco 9 # 1 835 FNL & 860 FEL Sec 9, T29N, R14W

1) Due to the Basin Fruitland Coal and Twin Mounds Pictured Cliffs intervals being Close in proximately to each other, and lack of reliable production history to make accurate determinations. You will be given authorization to produce the well with your proposed Allocation factors until December 1, 2003. At the end of period, you will be required to resubmit your allocations factors.