



RICHARDSON OPERATING COMPANY

1700 Lincoln, Suite 1700
Denver, Colorado 80203 (303) 830-8000
FAX (303) 830-8009

October 18, 2000



Oil Conservation Division
Attention: Dorothy
1000 Rio Brazos Road
Aztec, NM 87410

M-21-30N-14W

RE: WF Federal 21-1Y
Basin Fruitland Coal
API 30-045-30031

Dear Dorothy:

It appears you have returned our C-104 for the captioned well and formation for a *second* time (enclosed). When we received this document the first time, a letter was sent to your office on August 29, 2000, addressing the problems on the C-104. We believed that this answered all your concerns, but in the event the information was misplaced, we are providing it once more.

This well was drilled in both the Pictured Cliffs and Fruitland Coal formations. The PC formation was completed in March, 1999, while the FC was not completed until a year later. The appropriate reports, including a completion report and C-104 were filed and accepted for the PC formation. Our Downhole Commingling application was approved in September, 1998, and a copy is enclosed for your review. It was always our intention to produce the well from both formations.

A completion report has been filed for the Fruitland Coal formation, a copy of which is also enclosed for your information. There is a slight error regarding the perforations on our C-104, as it should read 1058'-1072'. These are the perf's for the FC formation.

We feel that all the necessary paperwork has been filed for this well as it pertains to its completion in the FC formation. If you are missing any pertinent documents relating to this well, please advise. Otherwise, we would expect prompt approval of our C-104 as it stands.

Sincerely,

Chris O'Shea
Engineering Technician

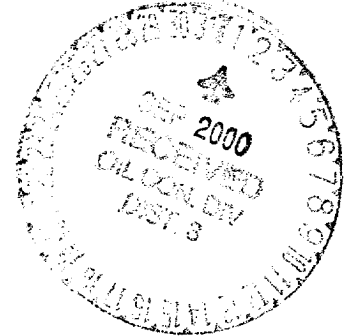
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RICHARDSON OPERATING COMPANY

1700 Lincoln, Suite 1700
Denver, Colorado 80203 (303) 830-8000
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August 29, 2000



Oil Conservation Division
Attention: Dorothy
1000 Rio Brazos Road
Aztec, NM 87410

RE: WF Federal 21-1Y
Basin Fruitland Coal
API 30-045-30031

Dear Dorothy:

We are in receipt of our C-104 for the captioned well, which you had returned for clarification. Said document is enclosed for your reference.

This well was drilled in both the Pictured Cliffs and Fruitland Coal formations. The Pictured Cliffs formation was completed in March, 1999, while the Fruitland Coal was not completed until a year later. A request for downhole commingling was approved in September, 1998, and a copy is enclosed for your review. Please note that there was an error made in setting out the correct Pictured Cliffs formation, but this has been amended by the OCD in Santa Fe this date.

The perforations listed in the C-104 are those of the Fruitland Coal formation, which should actually read 1058'-1072'.

This well, whose name was changed from the WF Federal 21-1R to the WF Federal 21-1Y, is currently producing from both zones. We would appreciate your quick approval of our C-104 so that we may begin reporting production.

Should you have any further questions, please contact the undersigned.

Sincerely,

Chris O'Shea
Engineering Technician

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