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February 15, 2006

HAND DELIVERED

Mr. Mark Fesmire, P.E., Director
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Case 13672

2006 FEB 14 PM 12 36

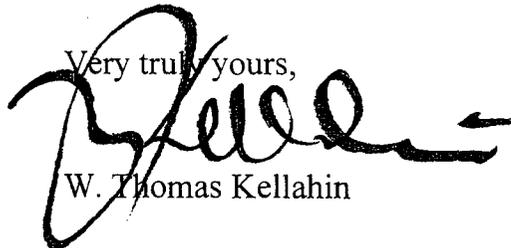
Re: Application of Burlington Resources Oil & Gas Company LP
for an exception to the well density requirements of the
Special Rules and Regulations for the Blanco-Mesaverde
Gas Pool and the Basin-Dakota Gas Pool,
Rio Arriba County, New Mexico

W/2 equivalent of Irregular Section 31, T28N, R6W
including the simultaneous dedication of the
San Juan 28-6 Unit Well 210 (Unit Letter K) and the
San Juan 28-6 Unit Well 210P (Unit Letter K) both located in the
same 40-acre tract of the spacing unit.

Dear Mr. Fesmire:

On behalf of Burlington Resources Oil & Gas Company LP, please
find enclosed our referenced application which we request be set for
hearing on the Examiner's docket now scheduled for March 16, 2006. Also
enclosed is our proposed advertisement of this case for the NMOCD
docket.

Very truly yours,



W. Thomas Kellahin

cc: Burlington Resources Oil & Gas Company LP
Attn: Alan Alexander

CASE 13672: Application of Burlington Resources Oil & Gas Company LP for an exception to the well density requirements of the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool, Rio Arriba County, New Mexico. Applicant seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool and the well density requirements of Rule II.B of the Special Rules and Regulations for the Basin-Dakota Gas Pool to permit it to produce the following 2 Mesaverde/Dakota Commingled gas wells in the same quarter-quarter section (NE/4SW/4) on a standard spacing and proration unit comprised of the W/2 equivalent of Irregular Section 31, T28N, R6W, NMPM:

(a) the San Juan 28-6 Unit Well No. 210 (API #30-039-2084100) located 1190 feet FWL and 1850 feet FSL (Unit K) of this section; and

(b) the San Juan Unit 28-6 Well No. 210P (API #30-039-2945800) located 2015 feet FWL and 1845 feet FSL (Unit K) of this section; and

These wells are located approximately 11 miles southeast of the Navajo City, New Mexico.

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION OF
BURLINGTON RESOURCES OIL & GAS COMPANY LP
FOR AN EXCEPTION TO THE WELL DENISTY
REQUIREMENTS FOR THE BLANCO-MESAVERDE
GAS POOL AND THE BASIN-DAKOTA GAS POOL,
RIO ARRIBA COUNTY, NEW MEXICO.**

CASE NO. 13672

APPLICATION

Burlington Resources Oil & Gas Company LP. ("Burlington") by its attorneys, Kellahin & Kellahin, seeks an order for an exception to the well density requirements of the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool, Rio Arriba County, New Mexico. Applicant seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool and an exception to the well density requirements of Rule II.B of the Special Rules and Regulations for the Basin-Dakota Gas Pool to permit it to produce the following 2 Mesaverde/Dakota commigled gas wells in the same quarter-quarter section (NE/4SW/4) on a standard spacing and proration unit comprised of the W/2 equivalent of Irregular Section 31, T28N, R6W, NMPM:

(a) the San Juan 28-6 Unit Well No. 210 (API #30-039-2084100) located 1190 feet FWL and 1850 feet FSL (Unit K) of this section; and

(b) the San Juan Unit 28-6 Well No. 210P (API #30-039-2945800) located 2015 feet FWL and 1845 feet FSL (Unit K) of this section; and

In support of its application Burlington states:

(1) Burlington is the current operator of the San Juan 28-6 Unit that includes, among other acreage, the W/2 equivalent of Irregular Section 31, T28N, R6W, Rio Arriba County, New Mexico.

(2) This spacing unit currently contained five wells completed in the Blanco-Mesaverde Gas Pool as follows:

(a) the San Juan 28-6 Unit Well No. 210 (API #30-039-2084100) located 1190 feet FWL and 1850 feet FSL (Unit K) of this section; and

(b) the San Juan Unit 28-6 Well No. 210P (API #30-039-2945800) located 2015 feet FWL and 1845 feet FSL (Unit K) of this section; and

(c) the San Juan 28-6 Unit Well No. 17 (API #300390723600) located 1555 feet FSL and 825 feet FWL (Unit K) of this section.

(d) the San Juan 28-6 Unit Well No. —210M (API #300392575600) located 1685 feet FNL and 900 feet FWL (Unit F) of this section.

(e) the San Juan 28-6 Unit Well No. —210N (API #300392945500) located 590 feet FNL and 1840 feet FWL (Unit C) of this section.

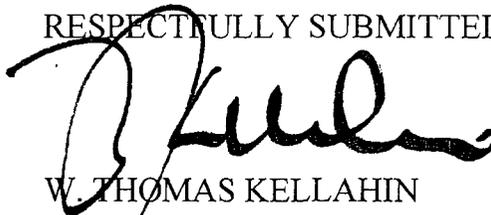
(3) The Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool are governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. See Order R-8170, as superseded by Order R-10987-A, effective February 1, 1999 and amended by Order R-10987-A (1), effective December 2, 2002.

See Order No. R-10987-B (2) dated 1/29/2002. These Special Pool Rules and Regulations provide, among other things, that an infill well shall not be located within the same quarter-quarter section (40-acre tract) and another well.

- (4) On or about November 22, 2005, Burlington recompleted the San Juan 28-6 Unit Well No. 210 such that the No. 210 and the No. 210P are both in the same quarter-quarter section and are located at standard distances from the outer boundaries of this GPU.
- (5) Upon becoming aware of its mistake, on January 9, 2006, Burlington shut-in the Well No. 210 that remains shut-in and is not producing from the Mesaverde or Dakota formations.
- (6) The total number of wells in this Mesaverde gas proration unit ("GPU") is MORE than what is allowed and the Well No. 210 and Well No. 210P are located in the same quarter-quarter section and therefore are in violation of the density requirements of this Special Pool Rules.
- (7) Burlington therefore requests that the Division enter its order granting an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool and Basin-Dakota Gas Pool approving the location of the San Juan 28-6 Unit Well No. 210 and the Well No. 210P in the same quarter-quarter section authorizing Burlington to simultaneously produce both wells and allow a density of five wells in the Mesaverde formation.
- (8) Approval of this application will not impair the correlative rights of any other interest owner in the Blanco-Mesaverde Gas Pool or the Basin-Dakota Gas Pool and will afford Burlington the opportunity to utilize the existing wells to produce the reserves from these GPU.
- (9) Approval of this application will be in the best interests of conversations, the prevention of waste and the protection of correlative rights.

WHEREFORE, Burlington Resources Oil & Gas Company, LP requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 16, 2006 and after notice and hearing as required by law, the Division enter its order granting an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool and its order granting an exception to the well density requirements of Rule II.B of the Special Rules and Regulations of the Basin-Dakota Gas Pool approving the location of the San Juan 28-6 Unit Wells No. 210 and No. 120P in the Mesaverde and Dakota formations and authorizing Burlington to simultaneously produced both wells.

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written over the printed name below.

W. THOMAS KELLAHIN
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