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RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

April 9, 2002

**HAND DELIVERED**

Ms. Lori Wrotenbery, Director  
Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

*Case 12854*

**Re: F-RPC 21 Well No. 2  
NW/4 PC Section 21, T29N, R13W  
Application of Richardson Production  
Company for compulsory pooling  
San Juan County, New Mexico**

Dear Ms. Wrotenbery:

On behalf of Richardson Production Company, please find enclosed the referenced application which we request be advertised for hearing on the Examiner's docket now scheduled for May 2, 2002. Also enclosed is our proposed advertisement of this case for that docket.

Very truly yours,



W. Thomas Kellahin

cc: Richardson Production Company  
Attn: Rebecca E. Van Blaricom

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## PROPOSED ADVERTISEMENT FOR NMOCD DOCKET

**CASE 12851**: Application of Richardson Production Company for compulsory pooling, San Juan County, New Mexico. Applicant seeks an order pooling all mineral interests in the Pictured Cliffs formation underlying the NW/4 of Section 21, T29N, R13W, NMPM, San Juan County, New Mexico, forming standard 160-acre spacing and proration units. This unit is to be dedicated to its F-RPC 21 Well No. 2 which is to be located in Unit E of Section 21 for production from the Pictured Cliffs formation (West Kutz Picture Cliffs Gas Pool). Also to be considered will be the costs of participation in the well, including but not limited to the costs of drilling, completing and equipping, with the inclusion of a risk factor penalty and the allocation of those costs and income therefor as well as actual operating costs and charges for supervision, and the designation of Richardson Operating Company as the operator of the well. The well is located approximately 1-1/2 mile south-southwest from center of Farmington, New Mexico.

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

**IN THE MATTER OF THE APPLICATION  
OF RICHARDSON PRODUCTION COMPANY  
FOR COMPULSORY POOLING  
SAN JUAN COUNTY, NEW MEXICO.**

CASE NO. 12854

**APPLICATION**

Comes now RICHARDSON PRODUCTION COMPANY, by its attorneys, Kellahin & Kellahin, and in accordance with Section 70-2-17.C (1978) applies to the New Mexico Oil Conservation Division for an order pooling all mineral interests in the Pictured Cliffs formation underlying the NW/4 of Section 21, T29N, R13W, NMPM, San Juan County, New Mexico, forming standard 160-acre spacing and proration unit. This unit is to be dedicated to its F-RPC 21 Well No. 2 which is to be located in Unit E of Section 21 for production from the Pictured Cliffs formation (West Kutz Picture Cliffs Gas Pool). Also to be considered will be the costs of participation in the well, including but not limited to the costs of drilling, completing and equipping, with the inclusion of a risk factor penalty and the allocation of those costs and income therefor as well as actual operating costs and charges for supervision, and the designation of Richardson Operating Company as the operator of the well.

In support of its application, Richardson Production Company ("Richardson") states:

1. Richardson has acquired a right to drill for the oil and gas minerals underlying the NW/4 of Section 21, T29N, R13W, NMPM, San Juan County, New Mexico.
2. Richardson has proposed to the other interest owners that this well be drilled and completed for potential production from the Pictured Cliffs production to be dedicated a 160-acre gas spacing and proration unit consisting of the NW/4 of this Section for production from the Pictured Cliffs formation.
3. Despite its good faith efforts, Richardson has been unable to obtain a written voluntary agreement from those owners as shown on Exhibit "A".
4. Pursuant to NMSA 1978, Section 70-2-17.C and in order to obtain its just and equitable share of production from the subject well and these spacing units, Richardson needs an order of the Division pooling the identified and described mineral interests in order to protect correlative rights and prevent waste.

5. In accordance with the Division's notice requirements, a copy of this application has been sent to those interest owners.

6. Richardson requests that this matter be set for a hearing before the Division on the next available Examiner's docket now scheduled for May 2, 2002.

WHEREFORE, Richardson, as applicant, requests that this application be set for hearing on May 2, 2002 before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described in these spacing units for the drilling, completion and operations of the subject well for production upon terms and conditions which include:

- (1) Richardson Operating Company be named operator;
- (2) provisions for each working interest owner to participate in any production by reimbursing the applicant for the value of the costs of drilling, completing, equipping and operating said well;
- (3) In the event a working interest owner fails to elect to participate, then provisions be made to recover out of production, reimbursement to the applicant for the costs of drilling, completing, equipping and operating the well, including a risk factor penalty of 200%;
- (4) Provision for overhead rates of \$5000 per month drilling and \$500 per month operating and a provision providing for an adjustment method of the overhead rates as provided by COPAS; and
- (5) For such other and further relief as may be proper.

RESPECTFULLY SUBMITTED:



W. THOMAS KELLAHIN  
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P. O. Box 2265  
Santa Fe, New Mexico 87501  
(505) 982-4285



Schedule of Unleased Interest Owners  
Address Listing  
F-RPC 21-2 and F-RPC 21-3

Frederick Elkins and Laurie Elkins  
1050 East 760 North  
Orem, UT 84097

Richards Elkins and Cassandra Elkins  
23115 Summers Drive  
San Antonio, TX 78258

Forrest Elkins and Patricia Elkins  
1303 Lacy Lane  
San Marcus, TX 78666

Ronald Elkins  
1539 East Elmwood Circle  
Mesa, AZ 85203

City of Farmington  
800 Municipal Drive  
Farmington, NM 87401

State of New Mexico Highway Department  
P O Box 1149  
Santa Fe, NM 87503

First National Bank of Iowa City, Iowa, Trustee  
204 West Washington  
Iowa City, IA 52244

Dr. William A. Hall  
416 North Behrend  
Farmington, NM 87401

Wells Fargo Bank, N.A.  
4601 East Main, Suite 1  
Farmington, NM 87402

F-RPC 21-3

William R. Amos, Trustee  
610 West Animas  
Farmington, NM 87401

