



Michael E. Stogner
Chief Hearing Office
New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, NM 87505

June 21, 2002

Re: Non-Standard Gas Proration Unit
Rosa Unit #164B
1475' FSL& 1235' FEL
Section 1-T31N-R6W
Rio Arriba County, NM
Basin Dakota

Case 12898

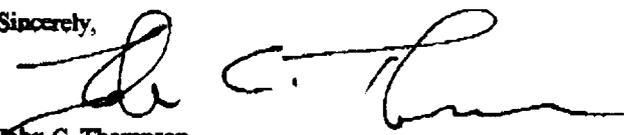
Dear Mr. Stogner,

Williams Production Company, LLC is seeking an exception to R-2046 (Non-Standard Proration Units in the Basin Dakota Gas Pool in Certain Partial Sections). According to rule 605.B(2)(a) Williams Production Company hereby requests administrative approval for a non-standard gas proration unit in the Basin Dakota pool for the referenced well. The proposed spacing unit is all of section 1, T31N, R6W, which is 303.88 acres due to a variation in the legal subdivision of the U.S. Public Land Surveys. The existing proration unit for this well under R-2046 is all of section 1 & NE/4 NE/4 of section 12 of 31N, R6W and is a total of 319.44 acres.

The proposed Rosa 164B is not located within the boundaries of the existing Dakota Participating Area. However, all of the adjacent acreage is committed to the Rosa Unit. As the Unit Operator of the Rosa Unit, Williams Production is the only offset operator. Attached is a plat indicating the well location and proposed spacing unit.

Thank you for your consideration of this application. If you have any questions, please do not hesitate to call me at (505) 327-4892.

Sincerely,


John C. Thompson
Agent/Engineer

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District I
PO Box 1980, Hobbs, NM 88241-1980

District II
PO Drawer 00, Artesia, NM 88211-0719

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code	*Pool Name
		72319 \ 71599	BLANCO MESAVERDE \ BASIN DAKOTA
*Property Code	*Property Name		*Well Number
17033	ROSA UNIT		1648
*GRID No.	*Operator Name		*Elevation
120782	WILLIAMS PRODUCTION COMPANY		6317

¹⁰ Surface Location

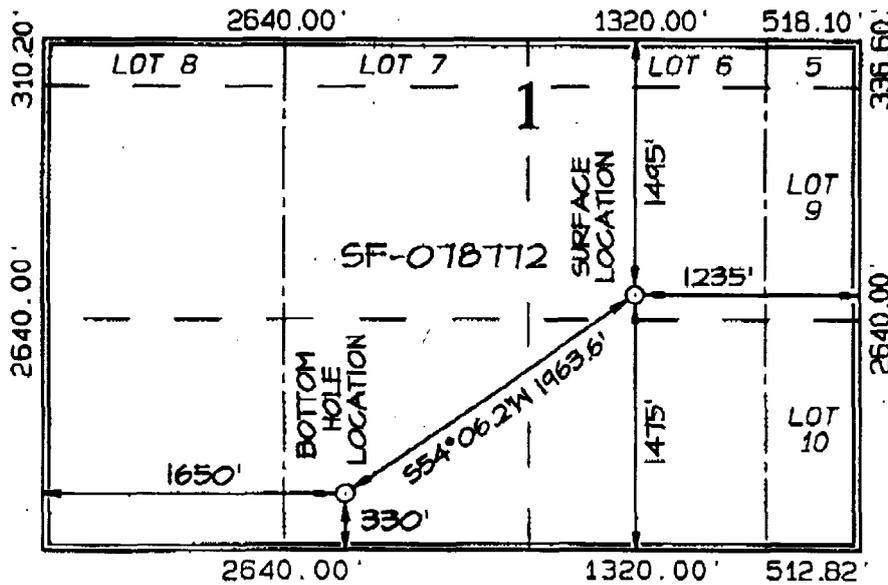
UL or lot no.	Section	Township	Range	Lot 30'	Feet from the	North/South line	Feet from the	East/West line	County
J	1	31N	6W		1475	SOUTH	1235	EAST	RIO ARRIBA

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot 30'	Feet from the	North/South line	Feet from the	East/West line	County
N	1	31N	6W		330	SOUTH	1650	WEST	RIO ARRIBA

¹² Deducted Acres	¹³ Joint or Infill	¹⁴ Conservation Code	¹⁵ Order No.
303.88 Acres - Entire Section			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

[Signature]

Signature
John C. Thompson
Printed Name
Agent/Engineer
Title
4/16/02
Date

¹⁸ SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision and that the same is true and correct to the best of my belief.

Date of Survey: APRIL 2, 2002

Signature and Seal of Professional Surveyor



[Signature]
Certificate Number 15269