

DEC 07 1990

STATE OF NEW MEXICO

OIL CONSERVATION DIV. SANTA FE

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE: 10198

APPLICATION OF RICHMOND PETROLEUM INC. FOR A HORIZONTAL DIRECTIONAL DRILLING PILOT PROJECT, SPECIAL OPERATING RULES THEREFOR, AN UNORTHODOX WELL LOCATION, AND NON-STANDARD SPACING UNIT, RIO ARRIBA COUNTY, NEW MEXICO.

APPLICATION

Comes now Richmond Petroleum Inc., by and through its attorneys, Kellahin, Kellahin & Aubrey, and applies to the New Mexico Oil Conservation Division for approval for a Horizontal Directional Drilling Pilot Project including special operating rules for its Jicarilla-Richmond JV Well #28 to be drilled at an unorthodox well location and a 430.56 acre non-standard spacing unit in Section 28, T27N, R2W, in the Gavilan Mancos Oil Pool, Rio Arriba County, New Mexico and in support thereof states:

- (1) Applicant is the operator of Section 28, T27N, R2W, N.M.P.M., Rio Arriba County, New Mexico.
- (3) Except as otherwise requested herein, Applicant proposes that this project be subject to the Special Rules and Regulations that govern the Gavilan Mancos Oil Pool and that Section 28 be dedicated as the spacing unit for the project.
- (4) As a result of governmental survey, Section 28 contains only 430.56 acres, more or less, which applicant seeks to be dedicated and approved as a non-standard spacing and proration unit for the subject well.

- (5) The Niobrara interval of the Mancos is the productive zone of the Gavilan Mancos Oil Pool, which is characterized by tight, low permeability blocks interconnected by a high capacity fracture system.
- (6) Past experience in said pool has shown that unless a conventionally drilled (vertical) well intersects such a fracture, the chance of obtaining commercial production is severely curtailed.
- (7) By drilling a horizontal wellbore, the applicant is attempting to increase the probability of encountering several of these fractures, which may ultimately result in the recovery of a greater amount of oil, thereby preventing waste.
- (8) In as much as the exact distance and direction of the lateral portion of the wellbore is not known at this time, the Applicant seeks approval to be allowed to drill said lateral portion anywhere within an area designated a target window as follows: commencing at a distance not closer than 500 feet from the east line and no closer than 500 feet from the south line of Section 28, thence towards a standard location so that once within the standard drilling window for the Gavilan Mancos Pool, portion of the wellbore shall be closer than 790 feet to the outer boundary of Section 28.

- (9) Applicant seeks an exception from Rule 4 of Order R-7407 as amended, to authorize the unorthodox well location based upon geologic reasons.
- (10) The offsetting operators and parties to whom notice is required are identified on Exhibit B.
- (11) In accordance with Division Notice Rule 1207, Applicant has notified by certified mail return-receipt all of those parties shown on Exhibit C of this application and the Applicant's request that this matter be set for hearing on January 10. 1991.
- (12) The granting of this Application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant requests that this matter be set for hearing on January 10, 1991 before a duly appointed Examiner of the Oil Conservation Division and, after notice and hearing as required by law, the Division enter its Order granting this application.

Respectfully submitted,

W. Thomas Kellahin

Kellahin, Kellahin & Aubrey

P. O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

Attorneys for Applicant

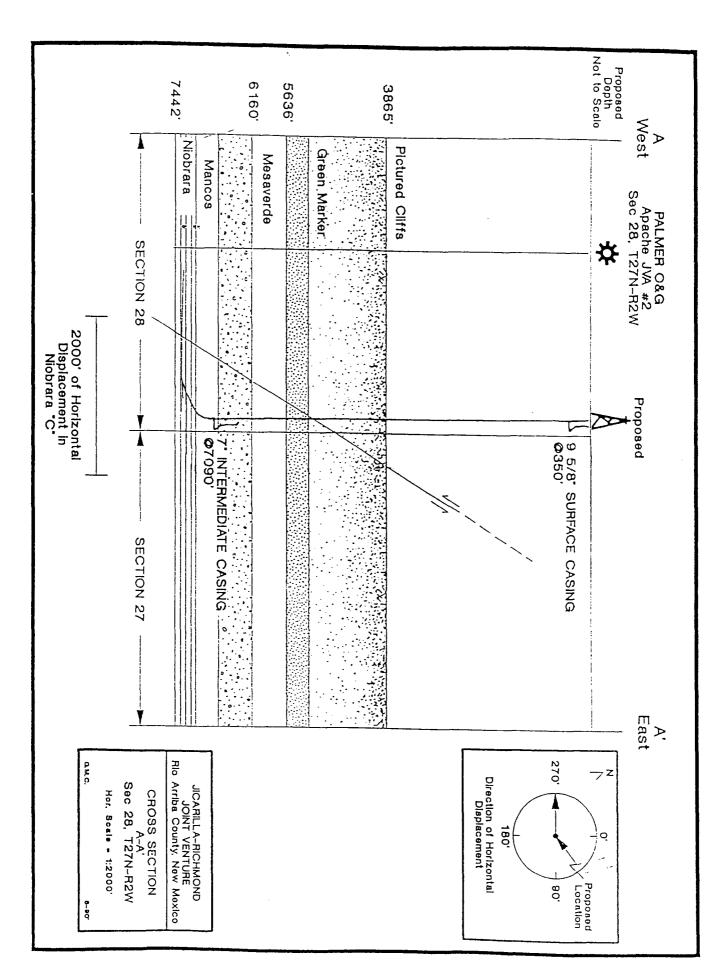


Exhibit A

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EXHIBIT "C"

Kindermac Partners 650 S. Cherry Street Denver, Colorado 80222

Roberts & Murphy, Inc. P.O. Box 7125 Shreveport, Louisiana 71137

Jicarilla Apache Tribe
Oil & Gas Administration
P.O. Box 507
Dulce, New Mexico 87528
Attn: Thurman Velarde

Giant Exploration Production Co. P.O. Box 2810 Farmington, New Mexico 87499

Dugan Production Corp. P.O. Box 420 Farmington, New Mexico 87499

EM Nominee Partnership Co. 4582 S. Ulster Street Parkway Denver, Colorado 80237

Quinoco P.O. Box 37811 Denver, Colorado 80237

Ominex International Corp. 8055 E. Tufts, #1060 Denver, Colorado 80237

Amoco Production Company P.O. Box 800 Denver, Colorado 80201

Southland Royalty Company 410 17th Street, #1000 Denver, Colorado 80202 W.M. Gallaway 3535 E. 39th Street Farmington, New Mexico 87401

Meridian Oil Inc. P.O. Box 4289 Farmington, New Mexico 87499

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

(Cas 10198

CANDACE HAMANN CALLAHAN

W. THOMAS KELLAHIN

JASON KELLAHIN OF COUNSEL

KAREN AUBREY

December 7, 1990

Mr. William J. LeMay Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87504

Application of Richmond Petroleum Inc. for a Horizontal Directional Drilling Pilot Project, Special Operating Rules therefore, an Unorthodox Well Location, and Non-standard Spacing Unit, Rio Arriba County, New Mexico

Dear Mr. LeMay:

On behalf of Richmond Petroleum Inc., please find enclosed our Application for a Horizontal Directional Drilling Project, Pilot Special Operating therefore, an Unorthodox Well Location, and Non-standard Spacing Unit which we request be set for hearing on the next available Examiner's docket now scheduled for January 10, 1990.

By copy of this letter and application to all parties, we are notifying them by certified mail, returnreceipt requested, that they have the right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support of or in opposition to the application.

Thomas

Kellahin

WTK/tic Enclosure Mr. William J. LeMay December 7, 1990 Page 2

cc: Mr. Steve Roche
 Roche Oil and Gas Corp
 6400 Uptown Blvd., N.E.
 Suite 480W
 Albuquerque, New Mexico 87110

Certified copy return receipt:

All parties listed on Exhibit "C" of application

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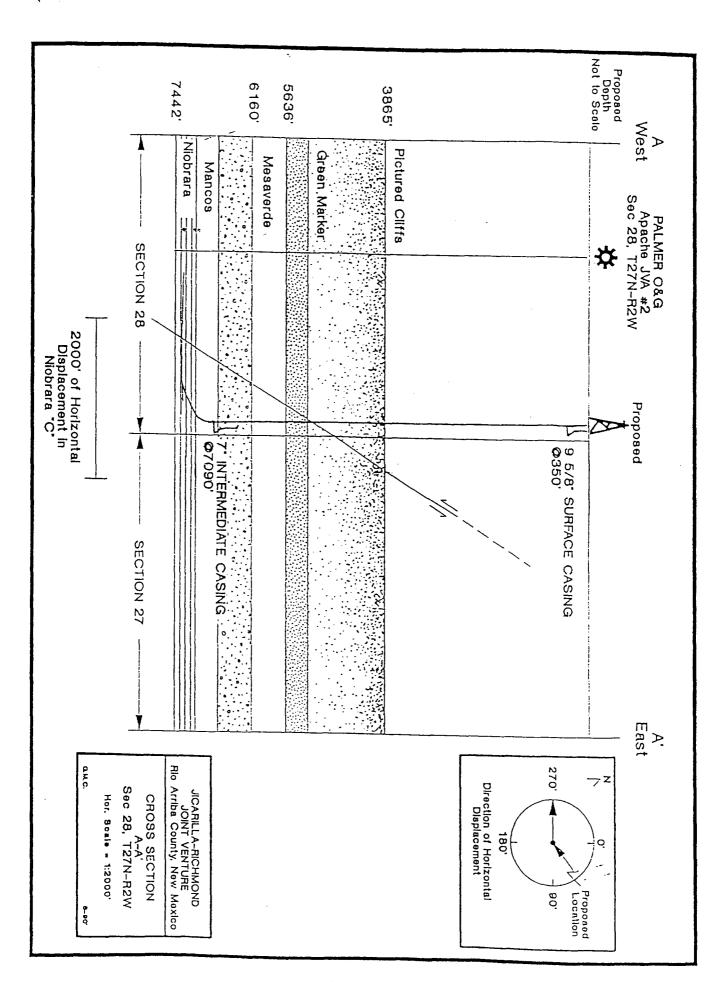


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December 7, 1990

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Dear Mr. LeMay:

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WTK/tic Enclosure Mr. William J. LeMay December 7, 1990 Page 2

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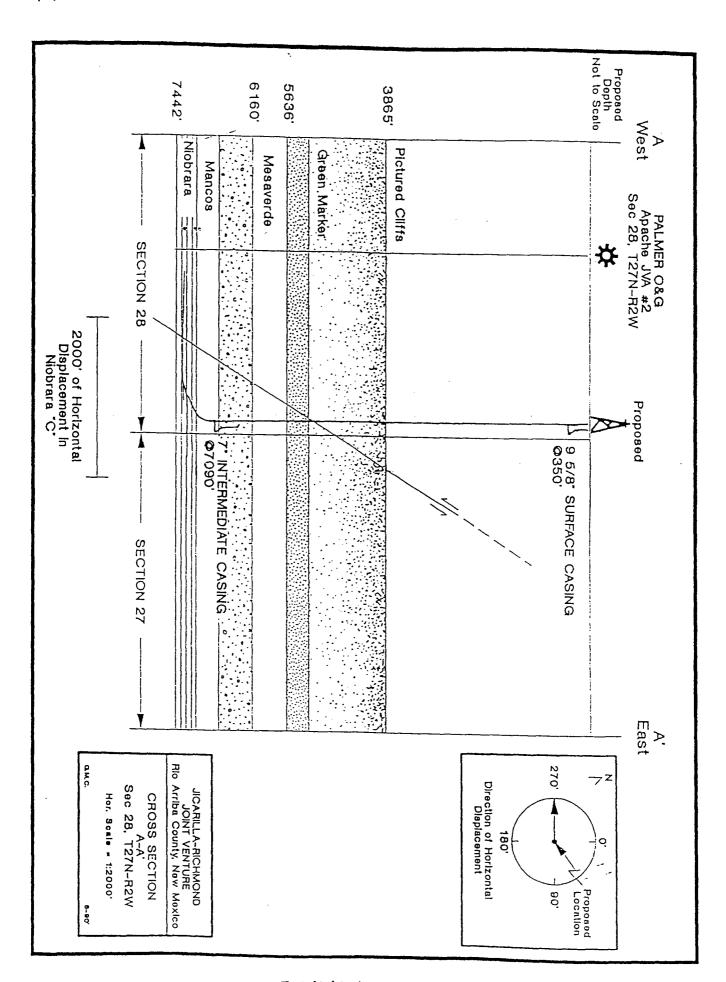


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-		**************************************	8.31.87 Parices 7 2.91	11.12.88	
	17	16		- U.S. Roys 7-22.85	
		15	Amoco 2.8.89 7.18.89	Amoco 4	_13
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Sec. 28 Township No. 27 North of Range No. 2 Worth	
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(4) 27.81	(3) 27.70	(2) 27.58	D 27.46
	Township	26 North	
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county Ric Arriba Pool Gavilan-Mancos Oil

TOWNSHIP 26 1	Jorth Range	2 ldest	NMPM	
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Ext: All secs. 25 and 26, All secs. 35 and 36 (R-8063, 1-3-86)

Ext: ALL SECS. 15, 22, 27 34. (R-8542 "/10/87) EXT: All of Sec's 10, 11,

14, 21, 23, 28, and 33 (R-8828, 12-22-88) EXT: All sec. 5 8,9 \$16 (R-8915 4-24-89)

EXT: All sec 3 (R-9016, 11-1-89) EXT: All SEC 2 (R-9091, 1-1-90)