

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

ROSA-883

- [1] **TYPE OF APPLICATION - Check Those Which Apply for [A]**
 [A] Location - Spacing Unit - Simultaneous Dedication
 NSL NSP SD
 Check One Only for [B] or [C]
 [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM
 [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR
 [D] Other: Specify _____
- [2] **NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply**
 [A] Working, Royalty or Overriding Royalty Interest Owners
 [B] Offset Operators, Leaseholders or Surface Owner
 [C] Application is One Which Requires Published Legal Notice
 [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
 [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
 [F] Waivers are Attached

Oil Conservation Division
 1220 S. St. Francis Drive
 Santa Fe, NM 87505

MAR - 8 2004

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[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

John C. Thompson [Signature] Engineer/Agent 3/1/04
 Print or Type Name Signature Title Date
John.Walsheng.net
 e-mail Address

Mr. Michael Stogner
New Mexico Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

March 1, 2004

Re: Request for Administrative approval for Non-Standard Mesaverde Location for the Rosa Unit 88B (Sec8/T31N/R6W, 2400' fsl & 2400' fwl, Rio Arriba County, New Mexico)

Dear Mr. Stogner,

Williams Production Company is requesting an administrative approval to construct the Rosa 88B as a Mesaverde well in a non-standard location. Williams has filed for and received an APD for a Mesaverde well from the Bureau of Land Management (BLM) – Farmington Field Office.

Originally, the location was picked by considering drainage from the offset Mesaverde wells and topography/archeology constraints. In this case, Williams picked their location in an attempt to minimize Mesaverde drainage interference with offset wells and utilize an existing location because of topography constraints.

Therefore, the reasons for requesting administrative approval for a non-standard location are:

1. Topography (because of the severe topography in this section, cliffs, canyons, etc) the existing Rosa 273A well pad was picked.
2. This location is also a good fit with projected drainage patterns within the Mesaverde formation - Rosa 88A to the west and the Rosa 167 BHL to the east. (see attached map showing drainage patterns).

The proposed Rosa 88B is located within the boundaries of the existing Mesaverde Participating Area but is encroaching upon the southeast quarter of section 8, which is not in the Mesaverde Participating Area. However, all of the adjacent acreage that is being encroached upon is either in the Participating Area or committed to the Rosa Unit. In support of this application, please find included a signed waiver from the offset Lessee. As the Unit Operator of the Rosa Unit, Williams Production Company, LLC is the only offset operator that is being encroached upon, thereby this proposed non-standard location would not affect any other operators.

Please find attached a drilling plat with topographical map showing location, drainage map and a portion of the unit map showing where the well is located within the unit.

If you have any questions or concerns, please feel free to contact me anytime.

Sincerely,

John C. Thompson
Engineer

*Note: Dakota interval dropped
by  Sundry
Notes dated 2-27-04*
c:wpx/nsdk88B

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

District II
PO Drawer DD, 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 30-045-31061		*Pool Code 72319 - 71599	*Pool Name Blanco Mesaverde - Basin Dakota
*Property Code 17033	*Property Name ROSA UNIT		*Well Number 88B
*OGRID No. 120782	*Operator Name WILLIAMS PRODUCTION COMPANY		*Elevation 6314'

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
K	8	31N	6W		2400	SOUTH	2400	WEST	SAN JUAN

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres 320.0 Acres - (W/2)	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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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

¹⁶ 	¹⁷ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Signature John C. Thompson Printed Name Engineer/Agent Title 3/1/04 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. Survey Date: NOVEMBER 5, 2001 Signature and Seal of Professional Surveyor JASON C. EDWARDS Certificate Number 15269

Standard 640-acre Section



Williams Production Company, LLC
One Williams Center
P.O. Box 3102
Tulsa, Oklahoma 74101
918/573-6169

February 20, 2004

BP America Production Company
Attn: Bryan G. Anderson
501 Westlake Park Blvd. (77079)
P.O. Box 3092
Houston, TX 77253-3092

SMUD
Attn: Barry Brunelle
P. O. Box 15830
Sacramento, CA 95852-1830

Re: Non-Standard Location Waiver
Proposed Rosa Unit #88B Mesaverde Formation Well
2400' FSL & 2400' FWL
W/2 Sec. 8, T31N, R6W
San Juan County, New Mexico

Gentlemen:

William Production Company, as Rosa Unit Operator, plans to drill the Rosa Unit #88B Mesaverde formation well to be located 2400' FSL and 2400' FWL of Sec. 8, T31N, R6W (W/2 dedication). The proposed location constitutes a Non-Standard location for production from the Mesaverde formation under the rules and regulations of the New Mexico Oil Conservation Commission.

Williams Production respectfully requests that you as the Offsetting Lessees in the Mesaverde formation waive any and all objections to the Non-Standard location of the Rosa Unit #88B well by signing a copy of this letter in the space below and returning this waiver to the undersigned at your earliest convenience.

Sincerely,

A handwritten signature in cursive script that reads "M. Vern Hansen".

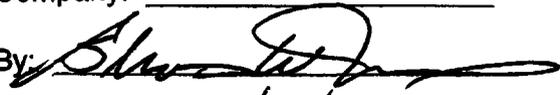
M. Vern Hansen
Staff Landman

Enclosure

Non-Standard Location Waiver
Rose Unit #88B
Page Two
2/20/04

Rosa Unit #88B Mesaverde formation well Non-Standard location waiver approved:

Company: SMUD

By: 

Date: 3/1/04



Williams Production Company,LLC
One Williams Center
P.O. Box 3102
Tulsa, Oklahoma 74101
918/573-6169

February 20, 2004

BP America Production Company
Attn: Bryan G. Anderson
501 Westlake Park Blvd. (77079)
P.O. Box 3092
Houston, TX 77253-3092

SMUD
Attn: Barry Brunelle
P. O. Box 15830
Sacramento, CA 95852-1830

received
FEB 23 2004

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Sincerely,

M. Vern Hansen
Staff Landman

Enclosure

Non-Standard Location Waiver
Rose Unit #88B
Page Two
2/20/04

Rosa Unit #88B Mesaverde formation well Non-Standard location waiver approved:

Company: ~~BP~~ **AMERICA PRODUCTION CO.**

By: *Bryan A Anderson*

Date: **FEB 24 2004**



WALSH

ENGINEERING & PRODUCTION CORP.

Petroleum Engineering Consulting
Lease Management
Contract Pumping

7415 East Main
Farmington, New Mexico 87402
(505) 327-4892 • Fax: (505) 327-9834

Mr. Michael Stogner
New Mexico Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

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March 1, 2004

MAR 8 2004

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Williams Production Company Requests for Administrative Approval for Non-Standard Locations within the Rosa Unit

Dear Mr. Stogner,

Williams Production Company is requesting an administrative approval to construct the following wells in non-standard locations for primarily drainage and topography issues.

Rosa 23C
Rosa 26C
Rosa 88B
Rosa 146A
Rosa 153B
Rosa 184B

Please find enclosed individual applications as well as the "latest" maps showing the participating areas for the Mesaverde and Dakota formations within the Rosa Unit.

If you have any questions or concerns about these applications, please feel free to contact me anytime.

Sincerely,

John C. Thompson
Engineer

cc: Steve Hyden - NMOCD Aztec
Larry Higgins - WPX

Stogner, Michael

From: John Thompson [john@walsheng.net]
Sent: Monday, March 01, 2004 10:39 AM
To: Stogner, Michael
Subject: NSL

Mr. Stogner,

Just wanted to give you a heads up on some NSL's that Williams Production wants to apply for (I'm sure just what you wanted to hear). Actually, I quit working for them last year but I guess they couldn't find anybody else to do the paperwork!

On the list of wells that they have given me, it looks like they are mostly NSL because of drainage or topo (or both).

I do have one question that I need help with. In the Mesaverde pool, if the well (a Mesaverde well) is located outside the Participating Area but within the boundaries of the Federal Unit do the setback requirements change back to 660' or are they still 10'?

Talk to you soon, hope all is well.

Thanks, John Thompson
Walsh Engineering & Production

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