



**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 Dakota Location for the Rosa Unit 23C (Sec 29/T31N/R5W, 2060' fsl & 220' fwl, Rio Arriba County, New Mexico)***

Dear Mr. Stogner,

Williams Production Company is requesting an administrative approval to construct the Rosa 23C as a dual Mesaverde/Dakota with the Dakota being non-standard. Williams has filed for an APD for a dual Dakota/Mesaverde well from the Bureau of Land Management (BLM) – Farmington Field Office.

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

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

1. The current location was picked by considering the Rosa 23B to the north and the Rosa 23 to the southeast. Also, the Rosa 64M to the northeast and the Rosa 102 to the west were considered as far as the Dakota was concerned (see attached map showing drainage patterns).
2. By itself, the Dakota (in this area) is at best very marginal economically and a dual completion helps capture additional reserves from the Dakota that otherwise would not be able to be economically developed.
3. Utilizing a single well bore for a dual completion would also negate the need for additional disturbance of another well, ie. well pad, road, pipeline ROW, etc.

***The proposed Rosa23C is not located within the boundaries of the existing Dakota Participating Area. However, all of the adjacent acreage that is being encroached upon is 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**

c:wpx/nsdk23C

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

State of New Mexico  
Energy, Minerals & Natural Resources Department

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

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

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

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

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

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		23C
*OGRID No.	*Operator Name		*Elevation
120782	WILLIAMS PRODUCTION COMPANY		6399'

<sup>10</sup> Surface Location

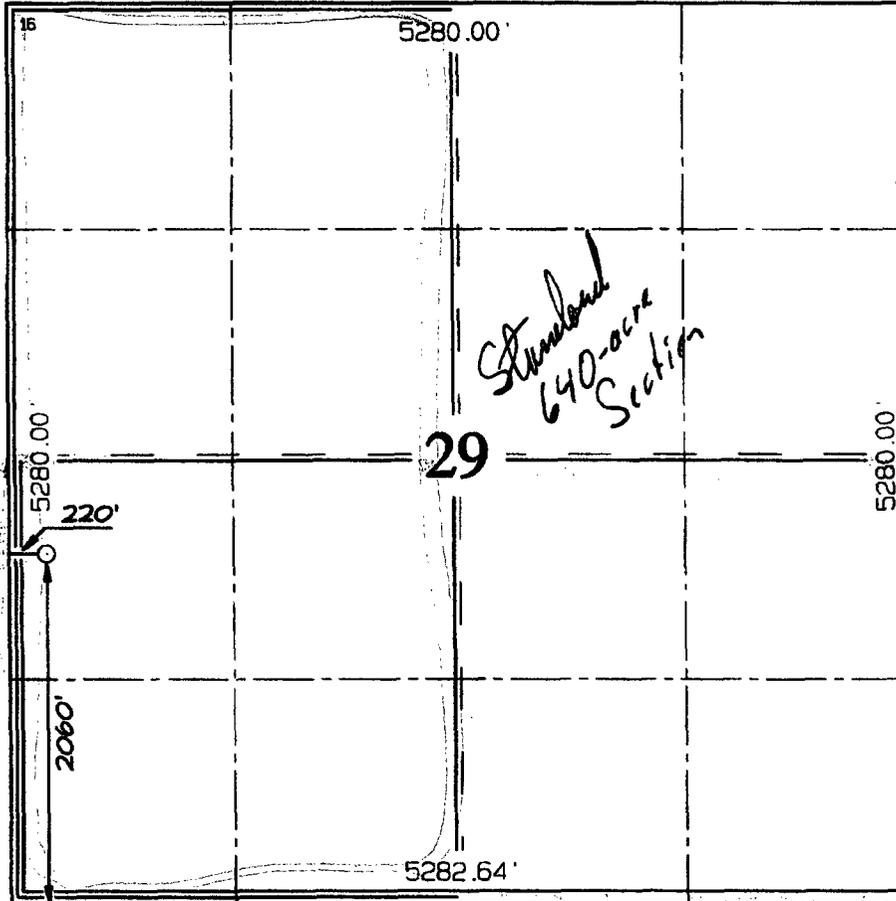
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
L	29	31N	5W		2060	SOUTH	220	WEST	RIO ARRIBA

<sup>11</sup> 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

<sup>12</sup> Dedicated Acres	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
320.0 Acres (W/2) - MV 320.0 Acres (S/2) - DK			

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



<sup>17</sup> 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  
Engineer / Agent  
Title  
3/1/04  
Date

<sup>18</sup> 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

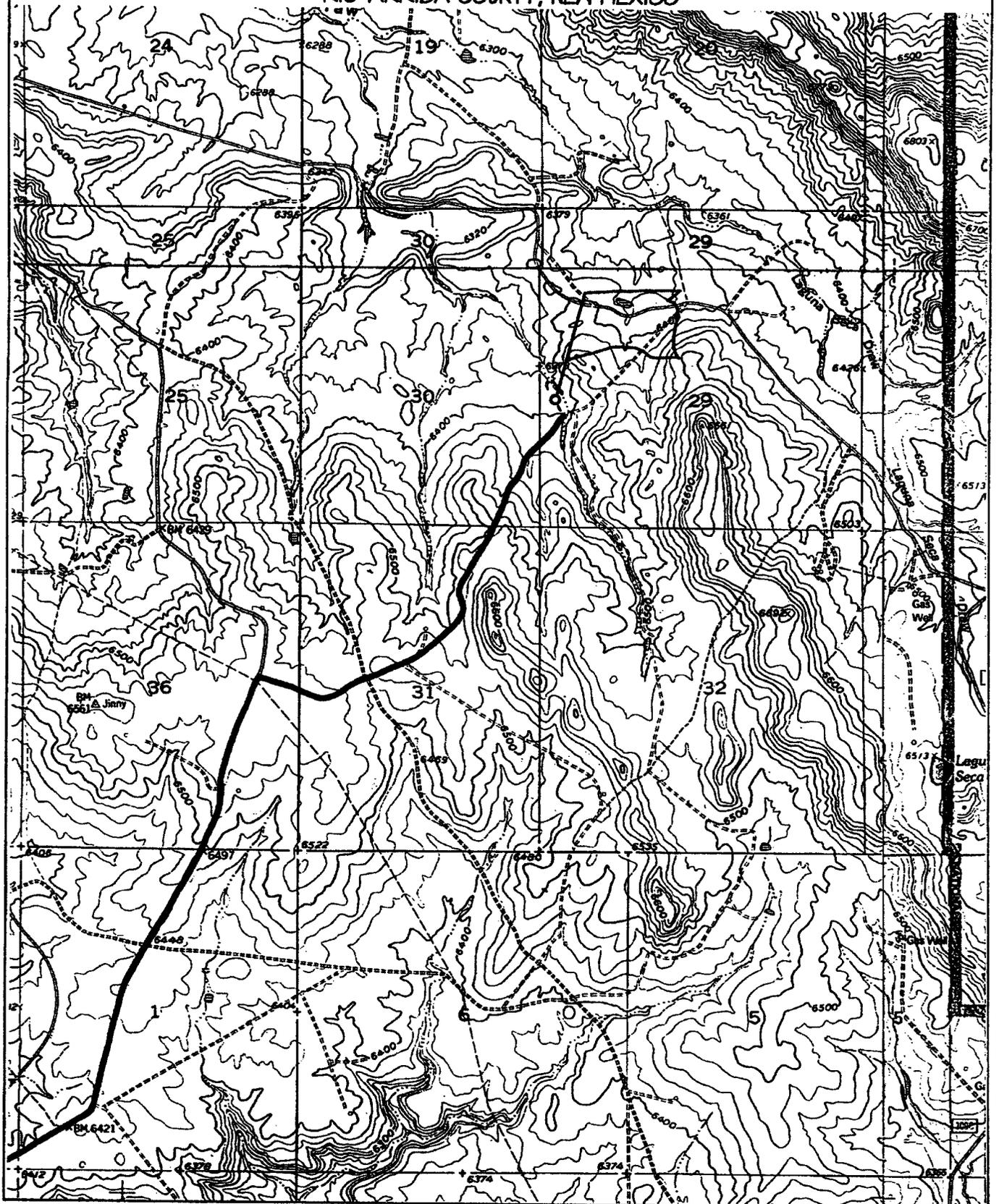
Survey Date: NOVEMBER 25, 2003  
Signature and Seal of Professional Surveyor



**JASON C. EDWARDS**  
Certificate Number 15269

*Mesaverde is within a PA with Section 30 to the West.*

WILLIAMS PRODUCTION COMPANY ROSA UNIT #23C  
2060' FSL & 220' FWL, SECTION 29, T31N, R5W, N.M.P.M.  
RIO ARriba COUNTY, NEW MEXICO





Post-it® Fax Note	7671	Date	2-24-04	# of pages	12
To	LARRY HIGGINS	From	BRYAN G. ANDERSON		
Co./Dept.		Co.	BP		
Phone #		Phone #	281-366-0755		
Fax #	970-563-3305	Fax #	-7099		



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

received  
 FEB 23 2004

Re: Non-Standard Location Waiver  
 Proposed Rosa Unit #23C Dakota Formation Well  
 2060' FSL & 220' FWL  
 S/2 Sec. 29, T31N, R5W  
 Rio Arriba County, New Mexico

Gentlemen:

William Production Company, as Rosa Unit Operator, plans to drill the Rosa Unit #23C Mesaverde/Dakota formation well to be located 2060' FSL and 220' FWL of Sec. 29, T31N, R5W (S/2 dedication). The proposed location constitutes a Non-Standard location for production from the Dakota formation under the rules and regulations of the New Mexico Oil Conservation Commission.

Williams Production respectfully requests that you as the Offsetting Lessee in the Dakota formation waive any and all objections to the Non-Standard location of the Rosa Unit #23C well by signing a copy of this letter in the space below and returning this waiver to the undersigned at your earliest convenience.

Sincerely,

M. Vern Hansen  
 Staff Landman

Enclosure

Non-Standard Location Waiver  
Rose Unit #23C  
Page Two  
2/20/04

Rosa Unit #23C Dakota formation well Non-Standard location waiver approved:

Company: BP AMERICA PRODUCTION CO.

By: *Suparna 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**

**RECEIVED** March 1, 2004  
MAR 8 2004

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

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

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**

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**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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T-31-N R-

BP America  
Prod. Co.

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Prod. Co.

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Williams,  
BP America

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Prod. Co.

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SF-078764  
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Williams, Turner

E-347  
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BP America Prod. Co.

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SF-078773  
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Dakota PA