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



JUL 13 2004

OIL CONSERVATION DIVISION

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]

[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

[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.

Anne Jones
 Print or Type Name

Anne Jones
 Signature

Land Manager
 Title

7/2/04
 Date

ajones@digii.net
 e-mail Address

NEELEY CONSULTING SERVICE, LLC
3001 Northridge Drive, Los Amigos Bldg
FARMINGTON, NEW MEXICO 87401
(505) 486-0211

July 2, 2004

Mr. Mark Fesmire, Director
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Request for Surface Commingling of Pools/Leases and Off-Lease Measurement/Sale of Gas Production
Richardson Operating Company's ROPCO 15 Gathering System
San Juan County, New Mexico

Dear Mr. Fesmire:

79680

Richardson Operating Company is writing to request your administrative approval to surface commingle natural gas production from the ROPCO GW PC 15-2 West Kutz Pictured Cliffs well with production from the ROPCO GW A PC B FC 15-1 a down-hole commingled West Kutz Pictured Cliffs / Basin Fruitland Coal well, for the mutual conservation benefit of centralized compression through Richardson's centralized electric compressor station located on the ROPCO GW PC 15-2 location and to get produced natural gas to the sales meter.

Application is, also, being made for off-lease sales measurement and production allocation to proportionally distribute production value and volume to the respective wells through a Central Delivery Point sales meter, also, being located on the ROPCO GW PC 15-2 location, SW/SE Section 15, T29N, R13W, NMPM, San Juan County, New Mexico.

Production allocation, to proportionally distribute "beneficial use" gas will be made from the CDP meter to the wells involved. In the event a line blow-down is necessary or other gas loss occurs from the gathering system, Richardson will determine the total volume lost using industry procedures for the conditions existing at the time of the loss. The total volume lost will be allocated to the individual wells affected using percentage of total volume factors determined for the wells.

Attachment No.1 is a Lease/Pool map showing the lease number and location of the lease plus the 2 existing wells operated by Richardson Operating Company that contribute production to the gas gathering system. This map also places all flow-lines, compressor and CDP equipment.

Attachment No. 2 is a schematic diagram clearly identifying the compressor and CDP equipment utilized. Net gas volume for the ROPCO GW PC 15-2 is determined by the Subtraction Method – the difference between the volume recorded at the CDP meter and the volume recorded at the orifice type allocation meter located on the ROPCO GW A PC B FC 15-1 location. The mechanical integrity of the gathering system has been demonstrated through pressure testing - the pressure charts are available for review.

Attachment No. 3 lists estimated or monthly production of each contributing well and BTU content along with other information requested by the NMOCD.

Attachment No. 4 is Pool Commingling production information requested.

Attachment No. 5 is Richardson Operating Company's Allocation Procedure.

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Attachment No. 6 is a list of all parties owning any interest in any of the production to be commingled. Richardson Operating Company has, on or before the date that this application was mailed to the NMOCD, sent notification to each of the interest owners by submitting a copy of the application and all attachments thereto, by certified mail, return receipt requested, advising them that any objection must be filed in writing with the Santa Fe office of the NMOCD within 20 days from the date the division received this application. Attachment No. 7 is a copy of the notice sent by certified mail to all interest owners. All notice letters have been sent by certified, return receipt mail and upon receiving the receipts, copies will be forwarded to the NMOCD. Attachment No. 8 is a copy of the "Affidavit of Publication" which was published in The Daily Times to further provide notice to all interest owners, anticipating that out of the volume of notices mailed by certified mail, there will be some receipts not returned.

As evidenced by the production allocation procedure (attachment No. 5) and the pool commingling production information (attachment No. 4), production volume will be properly allocated based upon quality and quantity.

The wells involved with this system typically have bottom hole pressures of 150 psi or less. The transporter's pipelines available for gas delivery typically have pressures in the 180 – 250 psi range, therefore these wells have no economic life without the use of compression – as long as the compression cost does not exceed the net revenue received from the production.

The minimal charges against lease production for "beneficial use" gas are far exceeded by the production rate increases due to the conservative benefit of centralized compression where compressor lease expenses decrease as the number of units employed decrease.

Richardson Operating Company is the sole operator participating in this project.

Should you need any additional information or have questions regarding this information, please feel free to contact me at 505-486-0122.

Sincerely,



Charles Neeley, PE
Agent for Richardson Operating Company

cc: NMOCD - Aztec

District I
1625 N. French Drive, Hobbs, NM 88240
District II
1301 W. Grand Ave, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St Francis Dr, Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107-B
Revised June 10, 2003

OIL CONSERVATION DIVISION
1220 S. St Francis Drive
Santa Fe, New Mexico 87505

Submit the original application to the Santa Fe office with one copy to the appropriate District Office.

APPLICATION FOR SURFACE COMMINGLING (DIVERSE OWNERSHIP)

OPERATOR NAME: Richardson Operating Company
OPERATOR ADDRESS: 4601 TDC Blvd, Suite 470, Denver Colorado 80237 Attention: Mr. Chuck Williams

APPLICATION TYPE:
 Pool Commingling Lease Commingling Pool and Lease Commingling Off-Lease Storage and Measurement (Only if not Surface Commingled)

LEASE TYPE: Fee

Is this an Amendment to existing Order? Yes No If "Yes", please include the appropriate Order No. _____
Have the Bureau of Land Management (BLM) and State Land office (SLO) been notified in writing of the proposed commingling
 Yes No

(A) POOL COMMINGLING
Please attach sheets with the following information

(1) Pool Names and Codes	Gravities / BTU of Non-Commingled Production	Calculated Gravities / BTU of Commingled Production	Calculated Value of Commingled Production	Volumes
See Attachment No. 4	See Attachment No. 4	See Attachment No. 4	See Attachment No. 4	See Attachment No. 4

(2) Are any wells producing at top allowables? Yes No
(3) Has all interest owners been notified by certified mail of the proposed commingling? Yes No.
(4) Measurement type: Metering Other (Specify) See Attachment No. 4
(5) Will commingling decrease the value of production? Yes No If "yes", describe why commingling should be approved

(B) LEASE COMMINGLING
Please attach sheets with the following information

(1) Pool Name and Code.
(2) Is all production from same source of supply? Yes No
(3) Has all interest owners been notified by certified mail of the proposed commingling? Yes No
(4) Measurement type: Metering Other (Specify)

(C) POOL and LEASE COMMINGLING
Please attach sheets with the following information

(1) Complete Sections A and E.

(D) OFF-LEASE STORAGE and MEASUREMENT
Please attached sheets with the following information

(1) Is all production from same source of supply? Yes No
(2) Include proof of notice to all interest owners. See Attachments No. 6 & No. 7

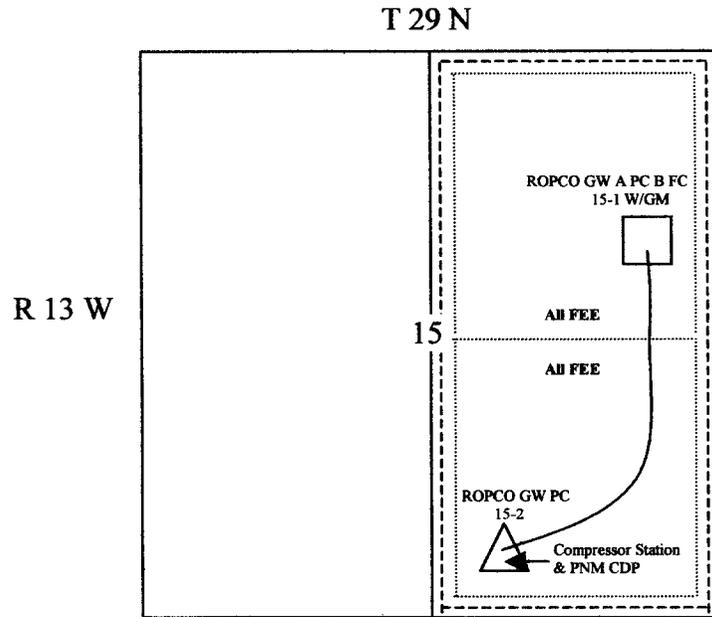
(E) ADDITIONAL INFORMATION (for all application types)
Please attach sheets with the following information

(1) A schematic diagram of facility, including legal location. See Attachment No. 2
(2) A plat with lease boundaries showing all well and facility locations. Include lease numbers if Federal or State lands are involved. See Attachment No. 1
(3) Lease Names, Lease and Well Numbers, and API Numbers. See Attachment No. 3

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

SIGNATURE: Charles Neelcy TITLE: Agent DATE: 7/2/04
TYPE OR PRINT NAME Charles Neelcy TELEPHONE NO.: 505-486-0211
E-MAIL ADDRESS: neelecc@acmet.com

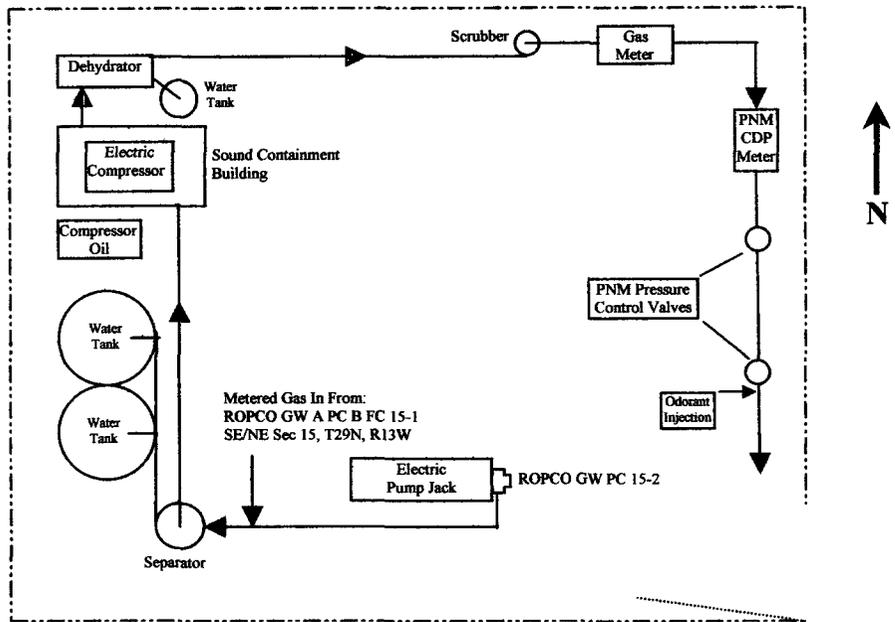
Wells / Leases / Pools - Map
 PNM CDP: ROPCO 15-1 & 15-2 Gathering System
 Section 15, T29N, R13W, NMPM
 San Juan County, New Mexico



Richardson Operating Company			
Type Leases	Dedication Boundary	Symbols	Comments
Fee	△	West Kutz Pictured Cliffs
Fee	- - - - -	□	West Kutz PC - Basin Fruitland Coal

Schematic Diagram of Facilities Richardson Operating Company

Central Compressor Station and PNM 15-2 CDP
Located On ROPCO GW PC 15-2 Location
SE/SE Sec 15 - 29N - 13W



Attachment No. 3
 Richardson Operating Company
 PNM ROPCO 15-2 Gathering System
 Central Delivery Sales Meter (PNM)
 San Juan County, New Mexico

Well	Name	API NO 30-045	Well Location		Pool Name	OGRID Pool Number	Well Location Lease Number	Type Lease	Spacing Unit	Monthly Production			
			1/4 1/4	Sec-Twn-Rng						MCFPM	BTU Fact	BOPM	BWPM
WELLS IN THE SYSTEM													
ROPKO GW A PC B FC 15-1		29407	SE/NE	15-29N-13W	W. Kutz PC/Basin F Coal	79680/71629	Fee	Fee	NE 1/4 & E 1/2	11227	1,010	-	652
ROPKO GW PC 15-2		29383	SE/SW	15-29N-13W	West Kutz Pictured Cliffs	79680	Fee	Fee	SE 1/4	5420	1,019	-	1517
Comments on Wells													
PLANNED WELLS TO BE ADDED TO THE SYSTEM - Not Yet Drilled													
STATUS													

H1 10000 15 Gw A PC B FC
 2171 FUL - 775 FEL
 H - 15 - 29, 13

H2 10000 15 Gw AC H2
 546 FUL - 1810 FEL
 O. 15, 29, 13

ATTACHMENT NO. 4 Richardson Operating Company POOL COMMINGLING - PRODUCTION SUMMARY

POOL_NAME	POOL CODE	WELL NAME	Volume AVG Monthly Production, mcf	BTU Factor	BTU - Non Commingled	Calculated BTU of Commingled Production
West Kutz Pictured Cliffs	79680					
		ROPKO GW PC 15-2	5420	1.019	5,522,980,000	
					0	
					0	
Lease & Pool Totals			5420		5,522,980,000	5,522,980,000

West Kutz PC - Basin Fruitland Coal	79680 & 71629					
		ROPKO GW A PC B FC 15-1	4834	1.010	4,882,340,000	
					0	
					0	
Lease & Pools Totals			4834		4,882,340,000	4,882,340,000

Total Combined Leases & Pools	10254	10,405,320,000	10,405,320,000
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Calculated value of commingled production:
 commingling production in the gathering system is necessary to get produced natural gas to the sales meter.
 CDP gas revenue and mmbtu will be allocated to individual wells using factors determined from the mmbtu
 produced from each well. Each well will be equipped with an allocation meter or an approved method of alternative
 measurement. There should be no loss in value to any well as a result of this pool commingling.

Notes:
 - Wells as of 3-02-04

Allocation Procedures
Richardson Production Co.'s
PNM ROPCO 15-2 Gathering System
CDP Gas Sales Meter: SE/SW 15-29N-13W (PNM Master Meter Station 9208)
San Juan County, New Mexico

Base Data:

V = Individual Well BTU

W = Gas Volume (MCF) from allocation meters or 'Subtraction Method Measurement' at individual wells during allocation period.

X = Gas Volume (MCF) from CDP Sales Meter (PNM Master Meter 9208) during allocation period.

Y = BTU's from CDP Sales Meter (PNM Master Meter 9208) during allocation period.

Allocation Period is typically a calendar month and will be the same for all wells.

1. **Individual Well Gas Production, MCF's** = A + B + C + D + E

A = Allocated Sales Volume, MCF = $(W/SUM W) \times X$

B = On lease fuel usage, MCF. Determined from equipment specification and operating conditions.

C = Purged and/or vented gas from well and/or lease equipment, MCF. Calculated using equipment specifications and procedures.

D = Allocated fuel from gathering system equipment, MCF. The total fuel required to operate gathering system equipment will be allocated to the individual wells benefiting from the equipment using allocation factors determined by W/SUM W for the wells involved.

E = Allocated volume of gas lost and/or vented from the gathering system and/or gathering system equipment, MCF. The total volume will be determined using industry procedures for the conditions existing at the time of the loss. All volumes corresponding to liquid condensation within the gathering system will also be determined. The total volume lost and/or vented will be allocated to the individual wells affected using factors determined by W/SUM W for the wells involved.

Note: The gas volume, W, for the ROPCO GW PC 15-2 will be determined by the 'Subtraction Method' where:

$$W_{ROPCO\ 15-2} = X - W_{ROPCO\ 15-1}$$

2. **Allocated Individual Well BTU_i's** = $((W \times V)/SUM (W \times V)) \times Y$.

Note: Individual well gas heating values to be determined in accordance with BLM regulations (currently Onshore Order No. 5).

Richardson Operating Company – Interest Owners Address List

Ropco 15 #1 PC (a) Ropco 15 #1 FC (b)
Ropco 15 #2 FC © Ropco 15 #2 PC (d)

WORKING INTEREST OWNERS

Flossie Alsup (b,)
499 Shasta Park Drive
Shasta Lake City, CA 96019

Roderick Allen Markham (a,b,c,d,)
1500 Broadway Suite 1212
Lubbock, TX 79401

Manon McMullen (a,b,c,d,)
2200 Berkeley
Wichita Falls, TX 76308

James Richardson (a,b,c,d,)
2925 Lawsdowne Lane
Oklahoma City, Ok 73120

Forest G. Smith, 111 (b,)
1710 S. Bayfront
Balboa Island, CA 92662

B. Tyler (c,)
809 Baird Circle
Aztec, NM 87410

Richardson Production Company
(a,b,c,d,)
4601 DTC Blvd, Suite 470
Denver, CO 80237

Christmann Mineral Co (a,b,c,,d,)
P.O. Box 66
Pinedale, WY 82941

Diamond Head Properties (b,c,,d,)
P.O. Box 2127
Midland, TX 79702

Herd Partners, LTD (b,c,d,)
P.O. Box 130
Midland, TX 79702-0130

ROYALTY INTEREST OWNERS

Arvilla Ainsworth (a,b,c,d,)
9120 E. Highway 252
Greenwood, AR 72936-8554

Clyde J. Alexander (b,)
808 South Carlton
Farmington, NM 87401

Flossie Alsup (a,,c,)
499 Shasta Park Drive
Shasta Lake City, CA 96019

Richard Austin (a,b,c,d,)
150 Harbor Lane
Farmington, NM 87401

Johnny F. Beecroft, Jr. (a,b,c,d,)
1302 West 3rd. Street
Winslow, AZ 86047

Steven Dwight Berg (a,b,c,)
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Kay L. Bettis (a,b,c,)
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David Blakley (d,)
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Farmington, NM 87499

Lynell Braught (b,c,d,)
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Dolan Springs, AZ 86441

Ira B. Briner (a,b,c,)

Albuquerque, NM

Eleanor P. Brown (a,b,c,)
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Ester L. Bugay (b,c,d,)
3245 Garland Street
Wheat Ridge, CO 80033-5821

Cynthia Calvin (b,)
747 NewPort Street
Denver, CO 80220-3507

Edward M. Calvin (b,)
8672 W. Stanford Avenue
Littleton, CO 80123-1811

Arthur B. Campbell (b,c,d,)
609 S. Carlton
Farmington, NM 87401-7818

Donna M. Cardin (a,b,c,)
70 Timberline Trail
Elizabethtown, KY 42701-8950

Betty Jean Carpenter (b,c,d,)
125 E. Twilight
Farmington, NM 87401-9328

Jose Carrasco (b,c,,d,)
1200 Mountview
Farmington, NM 87401

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Mesa, AZ 85204

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Gilert M. Cordova (a,b,c,)
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Debbie R. Daniel (b,d,)
712 McCormick School Road
Farmington, NM 87401

Dorothy L. Daniel (b,c,d,)
708 McCormick School Road
Farmington, NM 87401

Billy Ray Day (b,c,d,)
1603 E. 27th Street
Farmington, NM 87401

John J. Dempsey (b,c,d,)
929 Warm Springs Avenue
Boise, ID 83712

ROYALTY INTEREST OWNERS

John Denman (b,c,d)
1405 Camina Entrada
Farmington, NM 87401

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8900 Aspen NE
Albuquerque, NM 87112-3902

Jerald J. Eaton (a,b,c,
P.O. Box 630596
Nacogdoches, TX 75963-0596

Charles Acree Finklea (a,b,c,
C/o Bank of Oklahoma Trust Dept

Florence Nickerson Garcia (b,,c.,d.)
2800 N. Dustin #305
Farmington, NM 87401

Betty Jean Gifford (d.)
RR 1 Box 16604
Umitilla, OR 97882

Steve Groomer (b,c,d.)
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Farmington, NM 87401

Ruth Cliff Hale (b,c,d.)
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Las Vegas, NV 89148-2721

Darrell Gene Hardy (a,b,c,
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Farmington, NM 87401

William Harris (b,c,d.)
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Farmington, NM 87401

Steve Hodgson (b,c,d.)
1018 E. Murray Drive
Farmington, NM 87401-7232

Heidi Marie Hoffman (b,c,d.)
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Grand Junction, CO 81501

John Hunt (b, c, d.)
HC-77 Box 36
Laguna, NM 87026

Weldon C. Julander (c)

Evelyn Kozinor (b,c,d.)
1906 Zumi
Farmington, NM 87401-2460

Fern Knight Lane (a,b,c,
P.O. Box 822
Farmington, NM 87499

Stephen F. Leyba-Saiz (b,c,d.)
1116 Murray Drive
Farmington, NM 87401

Lisa A. Lorenz (b,c,d.)
111 Head of River Rd
Corbin City, NJ 08270-2539

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F. Dickens (b,c,
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Aztec, NM 87410

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Richmond, TX 77469

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C.V. Fisk (a,b,c,)

Geraldine J. Garcia (b,c,d.)

Justine Gordon (a,b,c,
809 E. Main Street
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Adrian M. Hollingsworth (b,c,d.)
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Thoreau, NM 87323-0966

Merrill Kempton (a,b,c,
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Farmington, NM 87499-0293

Dave Lakey (a, b,c,)

Dick Ledbetter (b,c,
C/o First National Bank
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Farmington, NM 87401

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2718 Aberdeen Court
Fort Collins, CO 80525-0693

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Alex Ferrendelli (a,b,c,
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Patrick J. Hale (b,c,d.)
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Tanis Harris (b,c,d.)
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Albuquerque, NM 87111

Mona Ivey (d.)
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Bernard W. Koski a,b,c,
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Truth or Consequence, NM 87901

John Dent Lamar (a,b,c,
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Farmington, NM 87499-0822

Lois R. Leese (b,c,
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Farmington, NM 87401

Venna Bernice Long (b,c,d.)
78 North 100 West
Spanish Fork, UT 84660-1707

Rocky C. Mace (a,b,c,
635 E. Main Street
Farmington, NM 87401

Elizabeth McBirney (a,b,c,)

Ruth Lee Methard (a,b,c,
626 Main Street
Red Bluff, CA 96080-3344

ROYALTY INTEREST OWNERS

Martin E. Mitchell (b,c,d)	Gabriel B. Montano (b,c,d)	Robert H. Mott (a,b,c) P.O. Box 1351 Corrales, NM 87048
Joe M. Narvaez (a,b,c) 1220 E. Camino De La Sombre Tucson, AZ 85718	Agnes Foutz Nelson (a,b,c) 1304 N. Mesa Verde Avenue Farmington, NM 87401-7016	Anna Noel (a,b,c) 511 McDonald Rd. Farmington, NM 87401-3583
William Nygren, Jr. (a, b, c,) 816 Crestview Drive Farmington, NM 87401	Geneva Hines Pace (a,b,c,) 1305 Camina Vega Farmington, NM 87401-8031	Isaac F. Padilla (b,c,d) #1 Road 5571 Farmington, NM 87401-1438
Hannes Parnegg (a,b,c,) P.O. Box 3667 Albuquerque, NM87190-3667	J. C. Patterson (a,b,c,d) 5706 Fawn Drive Farmington, NM 87402	John W. Pennington (a,b,c,)
Linda & Lawrence E. Peterson (a,b,c,) 29554 Road N Dolores, CO 81323-9399	Robert Pickett (a,b,c,) 1019 Third Street Anacortes, WA 98221-1503	Roy M. Pitchford (b,c,d) 901 Alpine Place Farmington, NM 87401
Shawnee Teeples Plunkett (b,c,d,) 1810 15 th Avenue Sana Cruz, CA 95062-1704	Kelly Prespentt (b,c,d,) P.O. Box 324 Farmington, NM 87499-0324	Bernice Pulliam (b,c,d,) 2544 N. Treat Avenue Tucson, AZ 85716-2401
Thomas Roe (b,c,) 1209 E. 18 th . Street Farmington, NM 87401	Virginia L. Rogers (b,c,d,) 6495 Camino Del Pargue Farmington, NM 87401	Clint L. Roper (a,b,c,) 5700 Jackrabbit Junction Farmington, NM 87402
Carol Dee Rowley (b,c,d,) 700 W. Temple Road Tooele, UT 84074	Madeline V. Schlemmer (a,) 2402 Huldy Street Houston, TX 77019	Ida Schmerbauch (a,b,c,)
Dr. Ralph Scott (a,b,c,) P.O. Box 27195 Las Vegas, NV 89126-1195	Fred Shorty (b,c,d,) 1201 Mountview Avenue Farmington, NM 87401	Erlene B. Skoba (b,c,) 808 South Carlton Farmington, NM 87401
Forest Garfield Smith 111 (a,b,) 1710 S. Bayfront Balboa Island, CA 92662	Lela L. Smith (b,c,d,) 1020 Murray Drive Farmington, NM 87401	William Glenn Stoltenberg (a,b,c,) 1900 Southside River Rd Farmington, NM 87401
Cherrie M. Tays (b,c,d,) P.O. Box 393 Solomon, AZ 85551	Chancie Lerue Teeples (b,c,d,) 3785 E. County Road 316 Citra, FL 32113	Charles Duane Teeples (b,c,d,) 229 W. Hess Avenue Coolidge, AZ 85228-3714
James Larry Teeples (b,c,d,) 22320 Sunshine Drive Whitmann, AZ 85361-9669	Estelle Williams Turner (a,b,c,) 270 Villeneuve West Montreal Quebec, CA PQH2V 2-2	Zelma Hines Tycksen (a,b,c,) 1309 Hines Road Farmington, NM 87401
B. Tyler (b,) 809 Baird Circle Aztec, NM 87410	Glenn Tyler (b,d,) 1018 E. Murray Drive Farmington, NM 87401	Evelyn L. Tyler (c,) 1018 E. Murray Drive Farmington, NM 87401-7232
Arcadio Valencia (b,c,d,) 1104 Alpine Farmington, NM 87401	H. G. Vessels (a,b,c,)	Alton J. Ward (a,b,c,) P.O. Box 88 Alamogordo, NM 88311
Reider Watson (b,c,) 1702 County Road 200-N Villa Grove, IL 61956-9735	Jack Watson (b,c,) 15230 South 1 st Street Dekalb, IL 60115	Chauncey B. Watson, Jr. (a,b,c,) 11563 South First Road Delaib, IL 60115-8926
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Paul James Williams (a,b,c,) Briar Hill Apts South Haven, MI 49090	Mary Helen Yunker (a,b,c,) 4460 El Oro Las Vegas, NM 89121	Ed P. Zembal (a,b,c,) 2908 E. 18 th Street Farmington, NM 87402

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<p>B & C. Development Corp (a,,b,c,) P.O. Box 983 Farmington, NM 87499-0983</p>	<p>Construction Supply (a, c,) 716 E. Main Street Farmington, NM 87401</p>	<p>The Denver & Rio Grande (a,b,c,) Western Railroad Co. C/o The Anschulz Corporation 555 17th Street Suite 2400 Denver, CO 80202</p>
<p>Desert Land Company (a,b,c,) P.O. Box 194 Farmington, NM 87499-9109</p>	<p>Eaton Limited Partnership (a,b,c,) P.O. Box 839 Farmington, NM 87499-0839</p>	<p>Justis Investment Co. Inc. (a,b,c,)</p>
<p>Holiday Inn (a,b,c,) 600 E. Broadway Farmington, NM 87401</p>	<p>Wells Fargo Bank (a,b,c,) P.O. Box 5383 Denver, CO 80217</p>	<p>Nygren Investment Company (a,b,c,)</p>
<p>Pavlantos and Pavlantos (a,b,c,)</p>	<p>Union Pacific Railroad (a,) P.O. Box 209711 Houston, TX 77216-9711</p>	<p>Central Latin American Dist (b,c,d,) Council of Assemblies of God P.O. Box 21167 Denver, Co 80221-0167</p>
<p>Clayton Investment Company (b,c,d,) 501 Airport Drive #100 Farmington, NM 87401</p>	<p>E-Z Praxis Co. (b,c,d,,) P.O. Box 839 Farmington, NM 87499</p>	<p>Gene's Frame and Alignment, Inc. (b,c,d,) 1213 Acadia Farmington, NM 87401</p>
<p>Clay-Groomer Machine Shop, Inc. (b,c,d,) 701 S. Carlton Avenue Farmington, NM 87401</p>	<p>Hopper Specialty Shop (b,d,) 9912 Mesa Arriba NE Albuquerque, NM 87111</p>	<p>Merrion Oil & Gas Corporation (a,b,c,d,) 610 Reilly Avenue Farmington, NM 87401</p>
<p>Pioneer Production (b,c,d,)</p>	<p>Sandoval Investments, Inc. (b,c,d,)</p>	<p>Veteran's Administration (b,c,d,) 500 Gold Avenue SW Albuquerque, NM 87102-3118</p>
<p>DDR Partnership (b,c,) P.O. Box 5207 Farmington, NM 87499</p>	<p>City of Farmington (b,c,d,) 800 Municipal Drive Farmington, NM 87401</p>	<p>James Richardson (a,b,c,d,) 4901 Samantha Lane Oklahoma City, OK 73120</p>
<p>Industrial Rentals of Farmington, INC. (b,c,) 801 South Carlton Farmington, NM 87401</p>	<p>Doris T. Reay (b,c,d,) 160 E. 900 N Spanish Fork, UT 84660</p>	<p>Wayne Smith (a,b,c,)</p>
<p>Rumaldo Rodriquez (b,c,d,) 3000 Northwood Circle Farmington, NM 87401</p>	<p>Union Pacific (a,)</p>	<p>Gene's Frame & Alignment (d,)</p>
<p>Holiday Inn (a,b,c,) 600 E. Broadway Farmington, NM 87499</p>		

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<p>Liston E. Leyendecker (a,b,c,d,) 2718 Aberdeen Court Fort Collins, CO 80525-0693</p>	<p>Roderick Allen Markham (a,b,c,d,) 1500 Broadway Suite 1212 Lubbock, TX 79401</p>	<p>Manon Mark McMullen (a,b,c,d,) 2200 Berkeley Wichita Falls, TX 76308</p>
<p>Dugan Production (a,b,c,d,) P.O. Box 420 Farmington, NM 87499-0420</p>	<p>Merrion Oil & Gas (a,b,d,) 610 Reilly Avenue Farmington, NM 87401</p>	<p>Providence Minerals, LLC (a,b,c,d,) 14860 Monfort Dr. Ste 209 Dallas, TX 75240</p>

OVERRIDING ROYALTY INTEREST OWNERS

Diamond Head Properties (a,b,c,d)
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Midland, TX 79702

Wells Fargo Bank (a,b,c)
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Denver, CO 80217

Christmann Mineral Co. (a,b,c,d)
P.O. Box 66
Pinedale, WY 82941

Herd Partners, LTD (b,c,d)
P.O. Box 130
Midland, TX 79702-0130

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Ad No. 49760

STATE OF NEW MEXICO
County of San Juan:

CONNIE PRUITT, being duly sworn says:
That she is the CLASSIFIED MANAGER of
THE DAILY TIMES, a daily newspaper of
general circulation published in English at
Farmington, said county and state, and that
the hereto attached Legal Notice was
published in a regular and entire issue of the
said DAILY TIMES, a daily newspaper duly
qualified for the purpose within the meaning of
Chapter 167 of the 1937 Session Laws of the
State of New Mexico for publication and
appeared in the Internet at The Daily Times
web site on the following day(s):

Friday, April 30, 2004.

And the cost of the publication is \$61.43.

Connie Pruitt

ON 5-3-04 CONNIE PRUITT
appeared before me, whom I know personally
to be the person who signed the above
document.

Jimmy Beck
My Commission Expires April 2, 2008.

COPY OF PUBLICATION

918 Legals
LEGAL NOTICE

Richardson Operating
Company, 3100 La Plata
Highway, Farmington, NM
87401 is applying to the New
Mexico Oil Conservation
Division (NMOCD) for
regulatory approval to surface
commingle natural gas
production and for off-lease
sales measurement and
production allocation to
proportionally distribute
production value and volume
to the respective wells
involved through a Central
Delivery Point sales meter
located on the ROPCO GW
PC 15-2 well location, SW/SE,
Section 15, T29N, R13W,
NMPM, San Juan County,
New Mexico. Production
allocation, to proportionally
distribute "beneficial use" gas
will be made from the CDP
meter to the wells involved
(those receiving the benefits
of centralized compression).

The 2 wells involved, ROPCO
GW A PC B FC 15-1 and
ROPCO GW PC 15-2, are on
numerous Fee Leases
operated by Richardson
Operating Company. The
wells, leases, facilities and
gathering systems are located
within East 1/2 of Section 15,
T29N, R13W, NMPM in San
Juan County, New Mexico.

The source of all natural gas
to be commingled and sold is
produced from one of the
following pools: West Kutz
Pictured Cliffs and Basin
Fruitland Coal.

Any person holding an interest
in any of these lands or leases

may contact Richardson
Operating Company for
additional information.
Inquiries should be directed to
Chuck Williams at 303-830-
8000 or by mail at 4601 DTC
Blvd, Suite 470, Denver,
Colorado 80237. Any
objections or request for a
formal hearing should be filed
in writing with the NMOCD's
Santa Fe Office within 20 days
from the initial date of this
publication. The NMOCD's
address is 1220 South St.
Francis Drive, Santa Fe, NM
87505.

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