

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:**

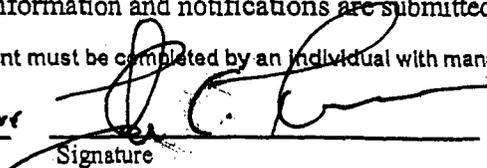
- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
- [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
- [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
- [WFX-Waterflood Expansion] [PMX-Pressure Maintenance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

2004 AUG 23 AM 11 28

- [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.

John C. Thompson  AGENT/Engineer 8/19/04  
 Print or Type Name Signature Title Date  
 John@Walsheng.net  
 e-mail Address



**WALSH**

ENGINEERING & PRODUCTION CORP.

2004 AUG 23

AM 11 28

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**

August 19, 2004

*Re: Non-standard Fruitland Locations*

Dear Mr. Stogner,

Please find enclosed two applications for non-standard locations. Both are due to archaeology and topography issues. If you need any additional information, please do not hesitate to call.

Also, wanted to update you on the status of the Participating Area for the Fruitland formation for the Rosa Unit. Williams submitted the plan to the BLM in the fall of 2003. Last week, calls were made to the BLM to determine the status of the application. At this point, the only information was that they are currently "still working on it". So unfortunately, that is about all the information I was able to discover.

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

Sincerely,

John C. Thompson  
Engineer

c:\wp\pa\nsldoc

cc: Steve Hyden

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

July 21, 2004

***Re: Request for Administrative approval for Non-Standard Fruitland Location  
Rosa Unit 222A (Sec15/T31N/R6W 1645' fsl & 2180' fel, Rio Arriba, New Mexico)***

Dear Mr. Stogner,

Williams Production Company is requesting an administrative approval to construct the Rosa 222A as a non-standard location in the Basin Fruitland formation. Williams has filed for an APD for a Basin Fruitland well with the Bureau of Land Management (BLM- Farmington office).

Originally, the surface location was picked by considering drainage from existing and planned offset Fruitland wells and topography/archaeology constraints. In this case, Williams would be unable to move the location any further to the east because of several archaeology sites that are located near the proposed location. Also, the proposed location is located on top of a narrow mesa that drops off into Navajo Lake on the north, west, south and southeast sides which narrowed the options for a standard location.

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

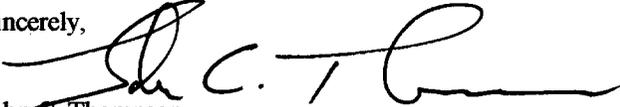
1. Archaeology (Several sites located on top of the mesa) – *refer to Arch Map.*
2. Topography (narrow/steep, limits options for location) – *refer to Topographical Map*

***Currently there is no established Fruitland Participating Area for the Rosa Unit. However, all of the adjacent acreage that is being encroached upon is committed to the Rosa Unit, and Williams Production Company, LLC is the offset operator. In support of this application, please find included a signed waiver from the offset Lessee.***

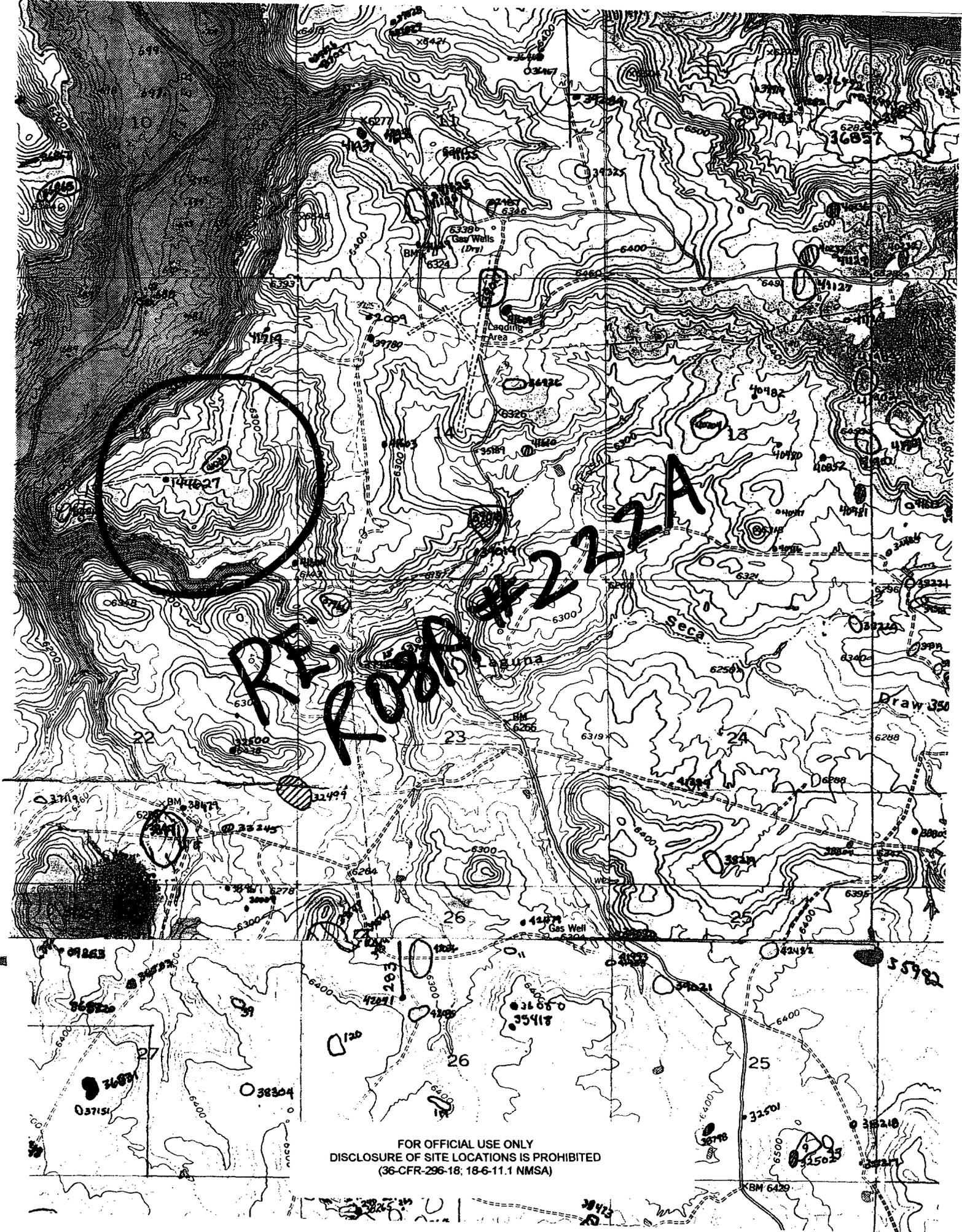
Please find attached a drilling plat with topographical map showing location, archaeology map, as well as a portion of the unit map showing where the well is located within the unit.

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

Sincerely,

  
John C. Thompson  
Engineer

c:wpx/nsdk222A



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 71629	*Pool Name BASIN FRUITLAND COAL
*Property Code 17033	*Property Name ROSA UNIT		*Well Number 222A
*GRID No. 120782	*Operator Name WILLIAMS PRODUCTION COMPANY		*Elevation 6321'

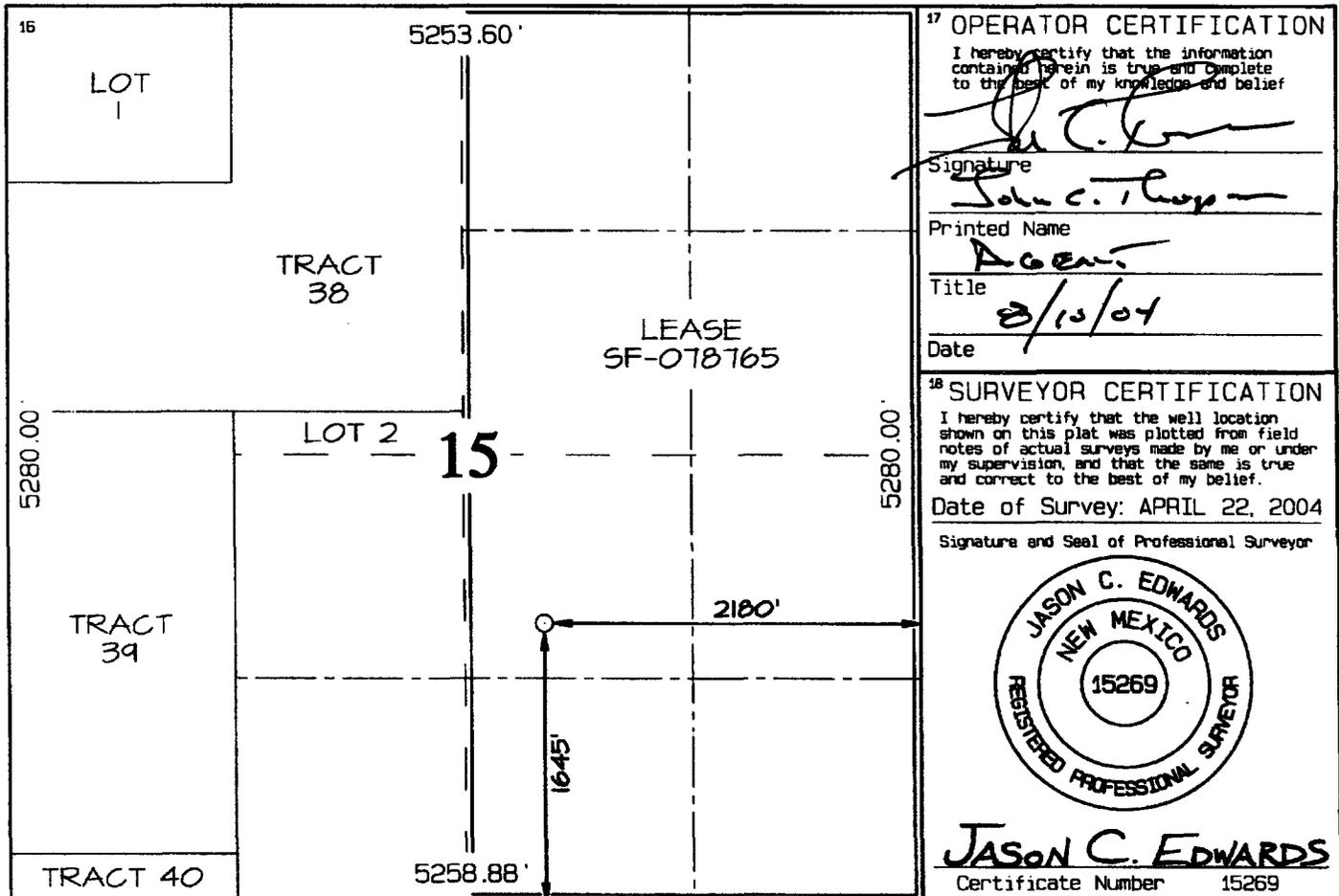
<sup>10</sup> Surface Location

UL or Lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	15	31N	6W		1645	SOUTH	2180	EAST	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 320.0 Acres - (E/2)	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.	

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

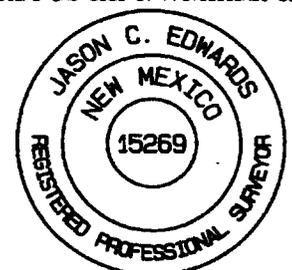


<sup>17</sup> OPERATOR CERTIFICATION  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

*[Signature]*  
Signature  
John C. Thompson  
Printed Name  
Agent  
Title  
2/15/04  
Date

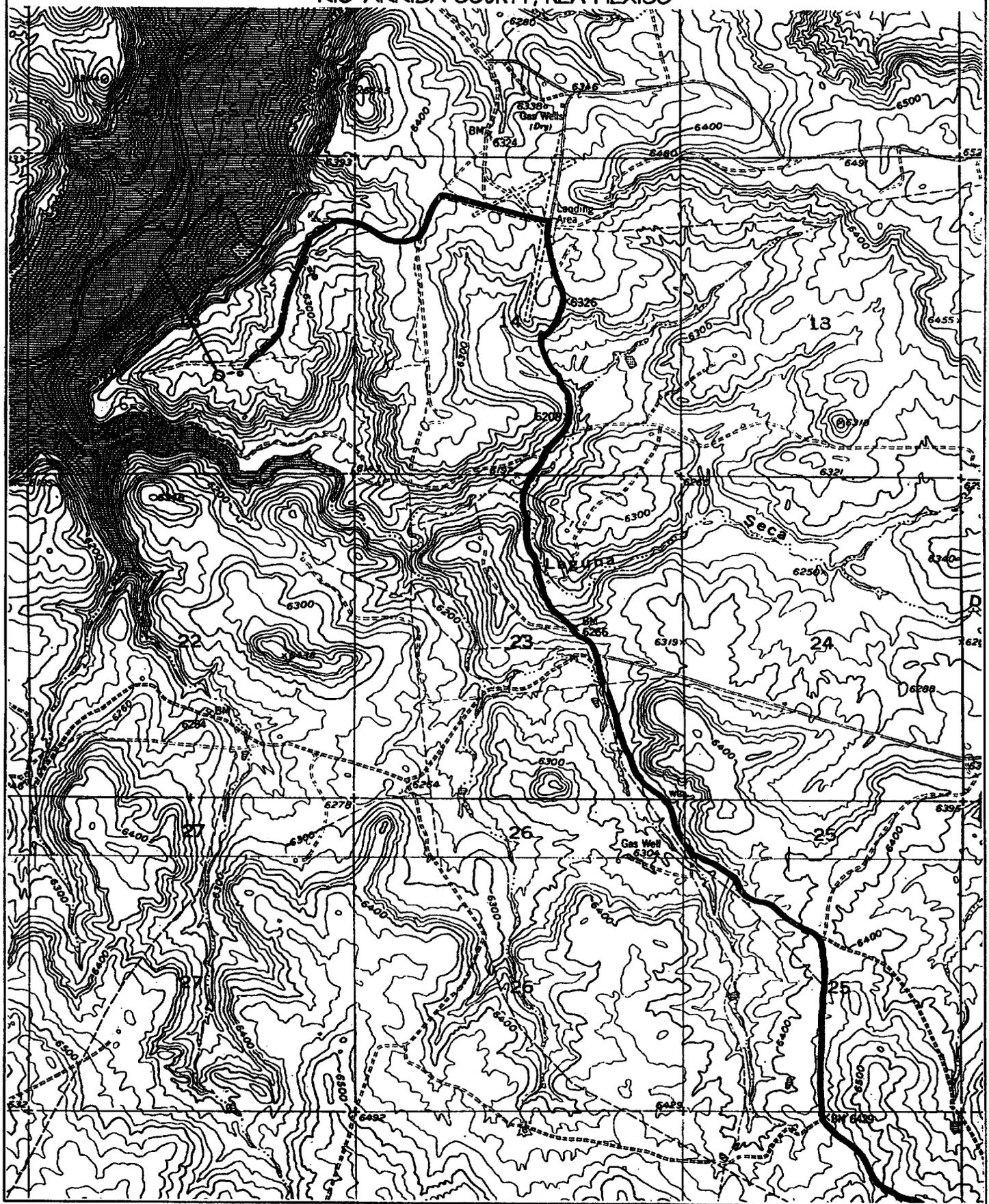
<sup>18</sup> SURVEYOR CERTIFICATION  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

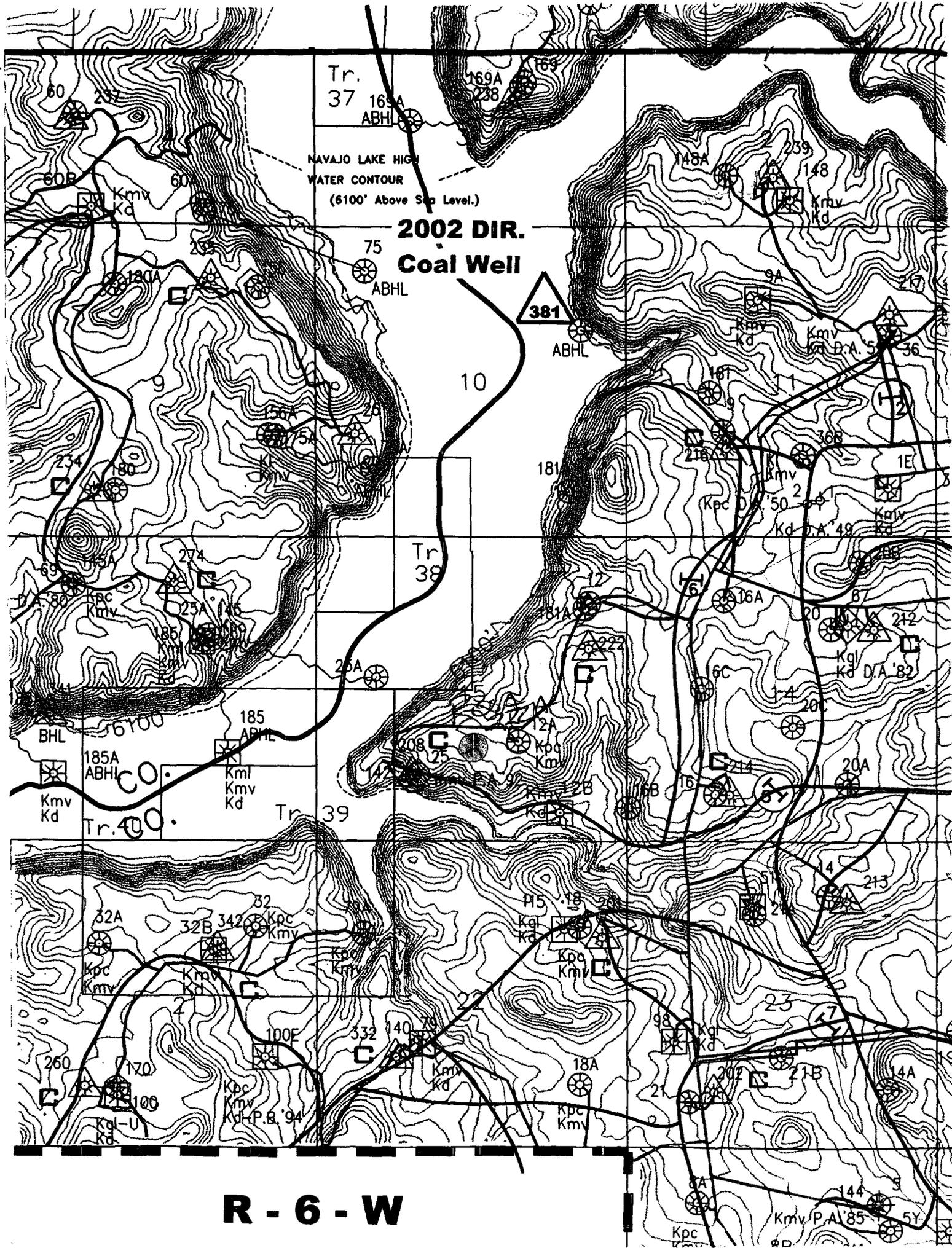
Date of Survey: APRIL 22, 2004  
Signature and Seal of Professional Surveyor



**JASON C. EDWARDS**  
Certificate Number 15269

WILLIAMS PRODUCTION COMPANY ROSA UNIT #222A  
1645' FSL & 2180' FEL, SECTION 13, T31N, R6W, N.M.P.M.  
RIO ARRIBA COUNTY, NEW MEXICO





**2002 DIR.  
Coal Well**

**R - 6 - W**



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

July 26, 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

ConocoPhillips  
Attn: Tom Scarbrough  
550 Westlake Park Blvd.  
Houston, TX 77079-2661

Re: Non-Standard Location Waiver  
Proposed Rosa Unit #222A Fruitland Coal Formation Well  
1645' FSL & 2180' FEL  
E/2 Sec. 15, T31N, R6W  
Rio Arriba County, New Mexico

Gentlemen:

William Production Company, as Rosa Unit Operator, plans to drill the Rosa Unit #222A Fruitland Coal formation well to be located 1645' FSL and 2180' FEL of Sec. 15, T31N, R6W (E/2 dedication). The proposed location constitutes a Non-Standard Location for production from the Fruitland Coal 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 Fruitland Coal formation waive any and all objections to the Non-Standard Location of the Rosa Unit #222A 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 black ink, appearing to read "M. Vern Hansen".

M. Vern Hansen  
Staff Landman

Enclosure

Non-Standard Location Waiver  
Rose Unit ~~##~~ # 222A  
Page Two  
~~22204~~

Rosa Unit #222A Fruitland Coal formation well Non-Standard Location Waiver approved:

Company: ConocoPhillips

By: Jennifer Barber

Date: 8/1/04

Post-it® Fax Note	7671	Date	8-2-04	# of pages	2
To	VERN HANSEN	From	B.G. ANDERSON		
Co./Dept.	WILLIAMS	Co.	BP		
Phone #	918-573-6169	Phone #	201-366-0155		
Fax #	-1963	Fax #	-7099		



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

July 26, 2004

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

SMUD  
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 Sacramento, CA 95852-1830

ConocoPhillips  
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 550 Westlake Park Blvd.  
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Sincerely,

  
 M. Vern Hansen  
 Staff Landman

Enclosure

Non-Standard Location Waiver

Rose Unit ~~#222A~~ #222A

Page Two

Rosa Unit #222A Fruitland Coal formation well Non-Standard Location Waiver approved:

Company: BP AMERICA PRODUCTION CO.

By: *Bryan A. Anderson*

Date: AUG 02 2004

BP AMERICA PRODUCTION CO.  
[Faint, illegible text]

BP AMERICA PRODUCTION CO.  
[Faint, illegible text]

BP AMERICA PRODUCTION CO.  
[Faint, illegible text]



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

July 26, 2004

BP America Production Company  
Attn: Bryan G. Anderson  
501 Westlake Park Blvd. (77079)  
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Sincerely,

M. Vern Hansen  
Staff Landman

Enclosure

Non-Standard Location Waiver  
Rose Unit #~~140A~~ #222A  
Page Two  
~~2220A~~

Rosa Unit #222A Fruitland Coal formation well Non-Standard Location Waiver approved:

Company: SMUD

By: Randy Bowelle

Date: 7-27-04