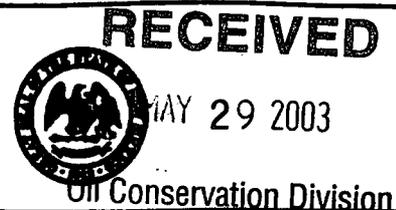


ABOVE THIS LINE FOR DIVISION USE ONLY

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]

- [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      [Signature]      ENGINEER/AGENT      5/22/03  
 Print or Type Name      Signature      Title      Date

John@Walsheng.NET  
 e-mail Address



**Ms. Lori Wrotenbery**  
**New Mexico Oil Conservation Division**  
**1220 South Saint Francis Drive**  
**Santa Fe, NM 87505**

May 22, 2003

***Re: Request for Administrative approval for Non-Standard Fruitland Location  
Rosa Unit 231A (Sec31/T31N/R5W,895' fsl & 170' fel, Rio Arriba County, New Mexico)***

Dear Ms. Wrotenbery,

Williams Production Company is requesting an administrative approval to construct the Rosa 231A as a non-standard location in the Basin Fruitland formation. Williams has filed an APD for a Basin Fruitland well from the Bureau of Land Management (BLM).

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

Therefore, the reason for requesting administrative approval for a non-standard location is:

1. The current location was picked by **considering drainage patterns** from the Rosa 337 to the east, the Rosa 230 to the northwest and the Rosa 231 to the west . (see attached map showing drainage patterns).

***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, 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/nsftc231A

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

1 API Number		2 Pool Code 71629		3 Pool Name BASIN FRUITLAND COAL	
4 Property Code 17033		5 Property Name ROSA UNIT			6 Well Number 231A
7 OGRID No. 120782		8 Operator Name WILLIAMS PRODUCTION COMPANY			9 Elevation 6462'

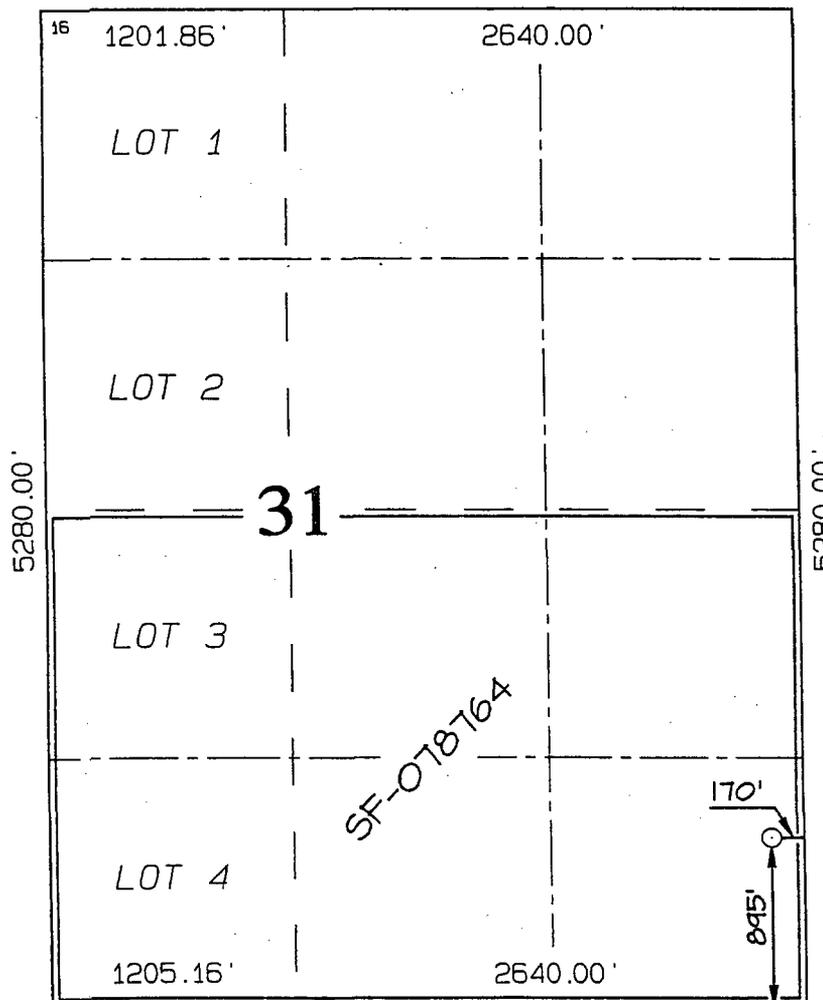
10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
P	31	31N	5W		895	SOUTH	170	EAST	RIO ARRIBA

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 232.99 Acres - (S/2)					13 Joint or Infill	14 Consolidation Code	15 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



17 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/Engineer  
Title  
May 1, 2003  
Date

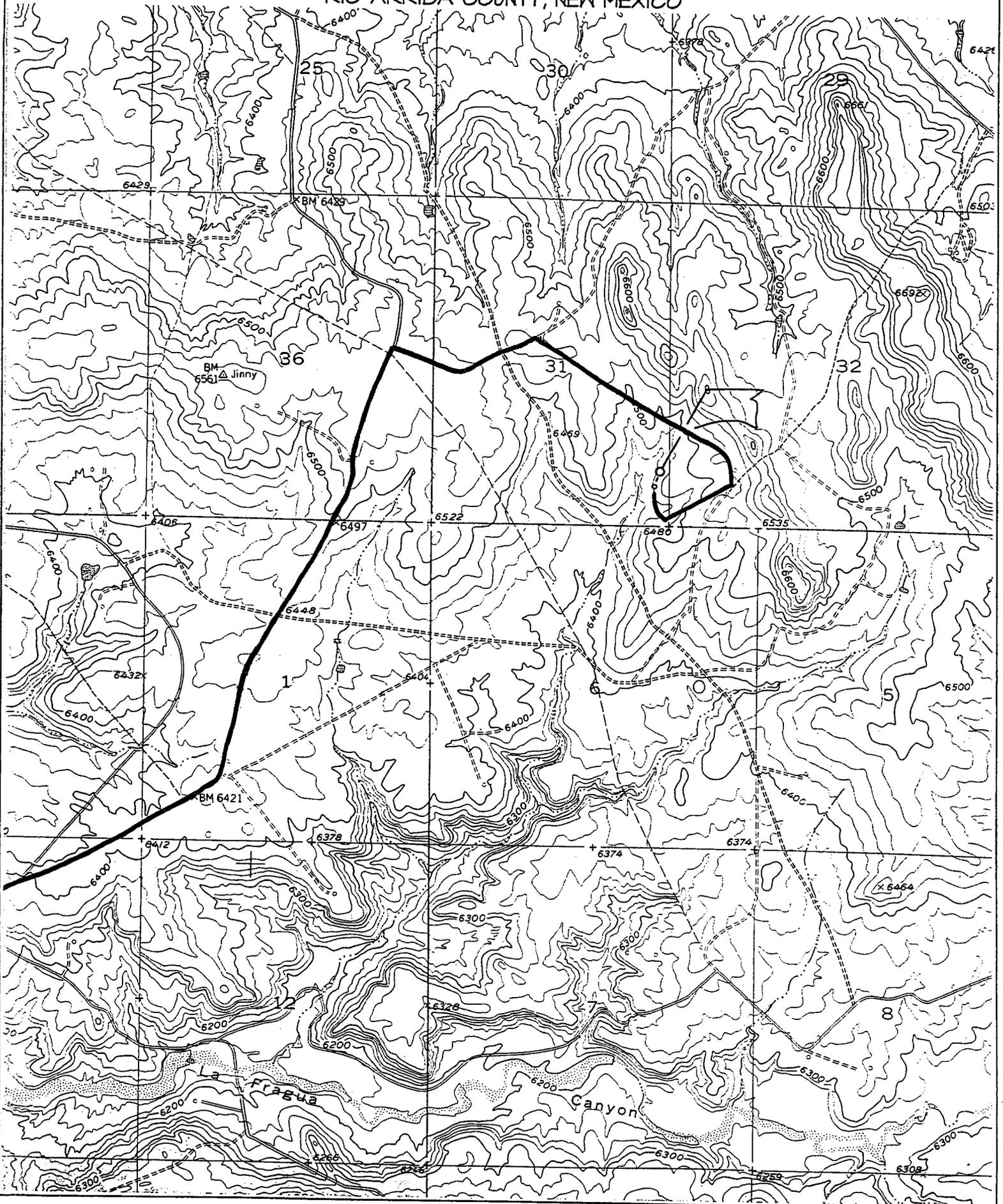
18 SURVEYOR CERTIFICATION  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

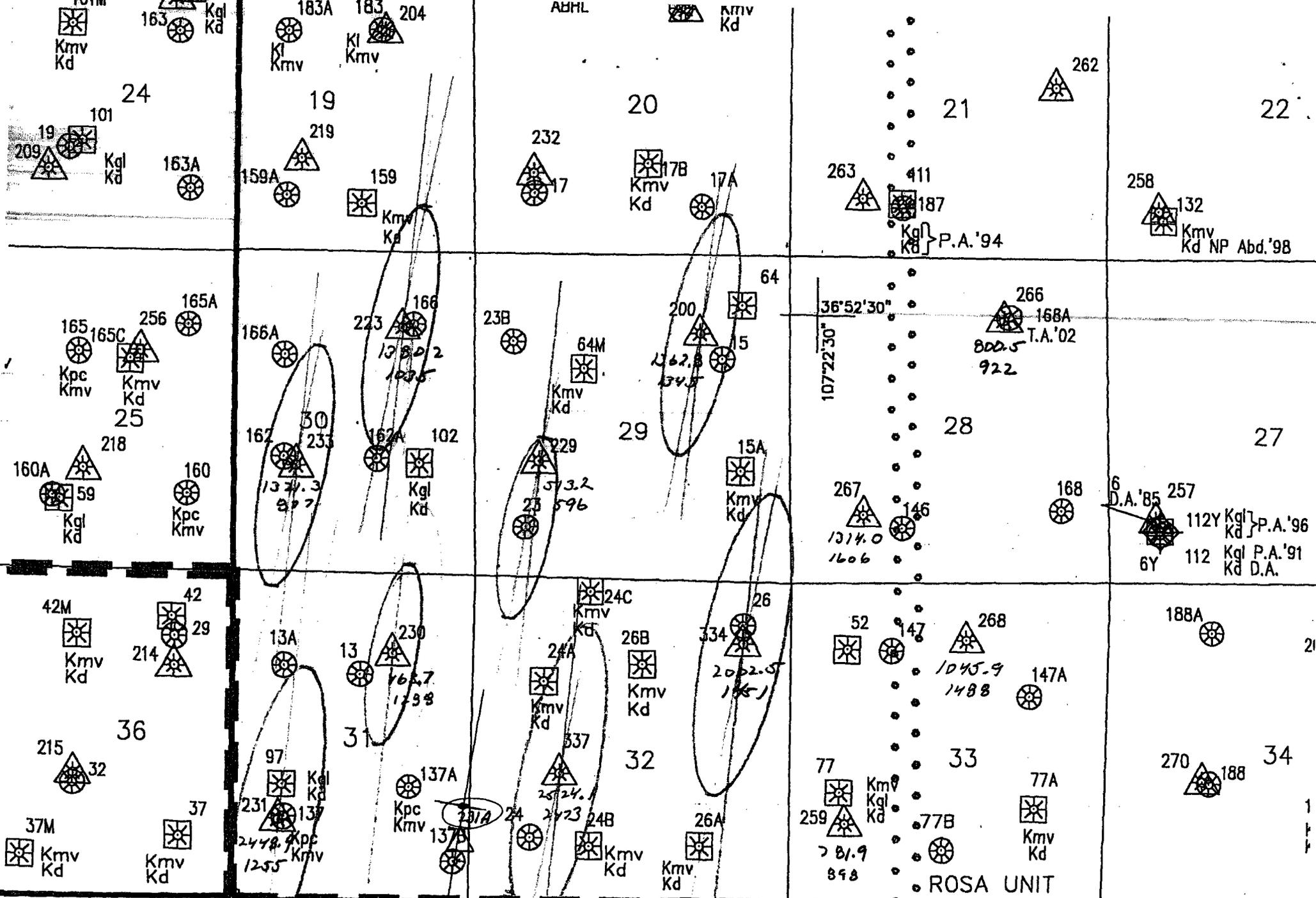
Date of Survey: MARCH 12, 2003  
Signature and Seal of Professional Surveyor

*[Seal: JASON C. EDWARDS, NEW MEXICO, REGISTERED PROFESSIONAL SURVEYOR, 15269]*

*[Signature: JASON C. EDWARDS]*  
Certificate Number 15269

WILLIAMS PRODUCTION COMPANY ROSE UNIT #231A  
895' F5L & 170' FEL, SECTION 31, T31N, R31W, N.M.P.M.  
RIO ARRIBA COUNTY, NEW MEXICO





Cum M HCF  
 ADR HCFD

5/9/2003 cum → M HCF

**R-5-W** MCFR

Rosa 231A

N 10 E



Williams Production Co., LLC  
One Williams Center  
P. O. Box 3102  
Tulsa, OK 74101  
918/373-6169

May 19, 2003

BP America Production Company  
P. O. Box 3092  
Houston, TX 77253-3092  
Attn: Bryan Anderson

Re: Non-Standard Location Waiver  
Proposed Rosa Unit #231A Fruitland Formation  
895' FSL & 170' FEL  
S/2 Sec.31,T31N,R5W  
Rio Arriba County, New Mexico

Dear Mr. Anderson:

William Production Company, as Rosa Unit Operator, plans to drill the Rosa Unit #231A Fruitland formation well to be located 895' FSL and 170' FEL of Sec.31,T31N,R5W (S/2 dedication). The proposed location constitutes a Non-Standard location for production from the Fruitland 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 Fruitland formation waive any and all objections to the Non-Standard location of the Rosa Unit #231A well by signing a copy of this letter in the space below and returning this waiver to the undersigned at your earliest convenience.

Very truly yours,

John C. Thompson  
Engineer/Agent

Enclosure

Rosa Unit #231A Fruitland formation well Non-Standard location waiver approved:

BP America Production Company

By: Bryan A. Anderson

Date: MAY 20 2003

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

May 2, 1989

Northwest Pipeline Corporation  
3539 East 30th Street  
Farmington, NM 87401

Attention: Mike Turnbaugh  
Senior Engineer

Administrative Order NSP-1572(L)

Dear Mr. Turnbaugh:

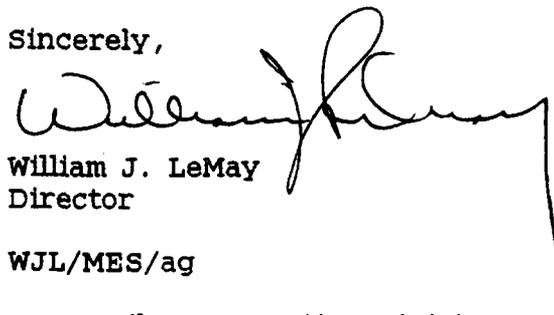
Reference is made to your application of November 11 and December 6, 1988 for a 232.89-acre non-standard gas proration unit consisting of the following acreage in the Basin-Fruitland Coal (Gas) Pool:

RIO ARRIBA COUNTY, NEW MEXICO  
TOWNSHIP 31 NORTH, RANGE 5 WEST, NMPM  
Section 31: Lots 3 and 4 and the SE/4

It is my understanding that this unit is to be dedicated to your Rosa Unit Well No. 231 to be drilled at a standard coal gas well location 1275 feet from the South line and 730 feet from the West line (Unit N) of said Section 31, hereby approved under provisions of Rule 8 of the Special Rules and Regulations for this pool as promulgated by Division Order No. R-8768.

By authority granted me under the provisions of Rule 6 of the Special Rules and Regulations for the Basin-Fruitland Coal (Gas) Pool, as promulgated by Division Order No. R-8768, the above non-standard gas proration unit is hereby approved.

Sincerely,



William J. LeMay  
Director

WJL/MES/ag

cc: Oil Conservation Division - Aztec  
NM Oil and Gas Engineering Committee - Hobbs  
US Bureau of Land Management - Farmington