



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

March 22, 2000

**Williams Production Company
P. O. Box 3102
Tulsa, Oklahoma 74101**

Attention: M. Vern Hansen

Re: Administrative application dated March 8, 2000 to establish two non-standard lay-down gas spacing and proration units within the Blanco-Mesaverde Pool to comprise: (i) Lots 1 and 2 and the NE/4 (N/2 equivalent) of Irregular Section 18, Township 31 North, Range 5 West, NMPM, Rio Arriba County, New Mexico; and (ii) Lots 3 and 4 and the SE/4 (S/2 equivalent) of Irregular Section 18.

Dear Mr. Hansen:

I have reviewed your one page application (see attached copy in its entirety) that was submitted to the New Mexico Oil Conservation Division ("Division") on March 9, 2000 via Federal Express. While I have researched most of the information needed to write an order that is both comprehensive and understandable, I can not find in the Division's records reference of any kind to the Rosa Wells No. 22-A, 182, and 182-A. Any information that you may have, such as copies of well files, or copies of proposed *Applications for Permit to Drill, Deepen, or Plug Back* ("APD"), or well staking plats, would be greatly appreciated and would help me immensely in finishing this order for you in a timely fashion.

Further, to ensure that an order issued by the Division in this matter meet all applicable requirements of the *New Mexico Oil and Gas Act*, Chapter 70, Article 2 NMSA 1978, please provide me with: (i) a map of the Rosa Unit; and (ii) a map showing the Blanco-Mesaverde gas participating area of the Rosa Unit.

I apologize for any delay this inconvenience may be causing Williams Production Company, I, however, wish to thank you for your cooperation, understanding, and continued support in this matter.

Sincerely,

Michael E. Stogner
Chief Hearing Officer/Engineer

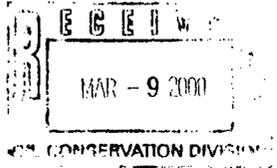
MES/ms

cc: New Mexico Oil Conservation Division - Aztec
Ms. Lori Wrotenbery, Director - NMOCD, Santa Fe
U. S. Bureau of Land Management - Farmington

March 8, 2000



Williams Production Company
One Williams Center
P.O. Box 3102
Tulsa, Oklahoma 74101



Via Federal Express

New Mexico Oil Conservation Division
Attention: Mr. Mike Stogner
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Application for Non-Standard Gas Proration Units
Blanco Mesaverde
Rosa Unit #22 and #22A Mesaverde Formation
N/2 Section 18, T31N, R5W; 231.89 Acres
Rosa Unit #182 and #182A Mesaverde Formation
S/2 Section 18, T31N, R5W; 231.83 Acres
Rio Arriba County, New Mexico

Gentlemen:

Williams Production Company, as Rosa Unit Operator, respectfully requests permission to produce the above captioned wells as Non-Standard Proration Gas Units. The unorthodox size of these units is necessitated by a variation in the legal subdivision of the U.S. Public Land Survey. Williams Production Company is the offset Operator.

The proration unit for the Rosa Unit #22 Mesaverde formation well was originally submitted as the E/2 of Section 18 when it was drilled in 1957. Williams Production Company believes that in order to fully develop Section 18 the appropriate proration unit for the Rosa Unit #22 should be changed to the N/2 of Section 18, T31N, R5W, and by this application requests approval of this change.

Sincerely,

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

M. Vern Hansen
Senior Landman

cc: Bureau of Land Management, Farmington
New Mexico Oil Conservation Division, Aztec