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DATE IN 2-25-05	SUSPENSE 3-10-05	ENGINEER STOENNER	LOGGED IN 2-25-05	TYPE NSL	PROJECT NO. PSEM0505646854
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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.

Deborah Marberry *Deborah Marberry* Regulatory Analyst 2/22/05
 Print or Type Name Signature Title Date

deborah.marberry@conocophillips.com
 e-mail Address



ConocoPhillips Company
Deborah Marberry
Regulatory Analyst
Mid-America Business Unit
Lower 48
WL3 - 6108
P.O. Box 2197
Houston, TX 77252
Phone: 832-486-2326
Fax: (832) 486-2764

February 18, 2005

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

Re: Application for Non-Standard Location
Basin Fruitland Coal
San Juan 32 Fed 15 # 1A
Unit Letter I, Section 15 T32N-R9W
2434' FSL and 120' FEL
San Juan County, New Mexico

Mr. Stogner:

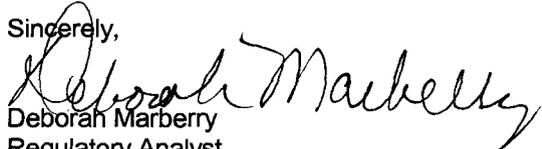
ConocoPhillips plans to drill the San Juan 32 Fed 15 # 1A located 2434' FSL and 120' FEL, Section 15, T32N, R9W, San Juan County, New Mexico in 2005. The well will be drilled to access Fruitland Coal reserves from the SE/4 of Section 15. The current reservoir pressure in the area is 900-1000 psi. The infill well is required to ensure timely and complete drainage of remaining Fruitland Coal reserves. Currently, the offset drillblock is owned 82% by ConocoPhillips and 18 % by Williams, but once the well is declared commercial the acreage will become part of the Burlington Resources operated 32-9 Unit. ConocoPhillips also plans on drilling the SW/4 Section 14 T32N-R9W in 2005. Attached is a waiver from Burlington for our non-standard location.

Due to the topography (Box Canyon) and Archeological sites located in the SE/4 of Section 15 the well surface location at 2434' FSL and 120' FEL is required. Please see the attached letter from Steven L. Fuller, La Plata Archeological Consultants, stating: "The well took considerable effort to stake due to the numerous archeological sites within the SE/4 of Section 15. We tried to skip west past archeological sites, but the topography drops off steeply throughout the W/2 of the SE/2." Also attached is a topo plat showing the well location and our C-102.

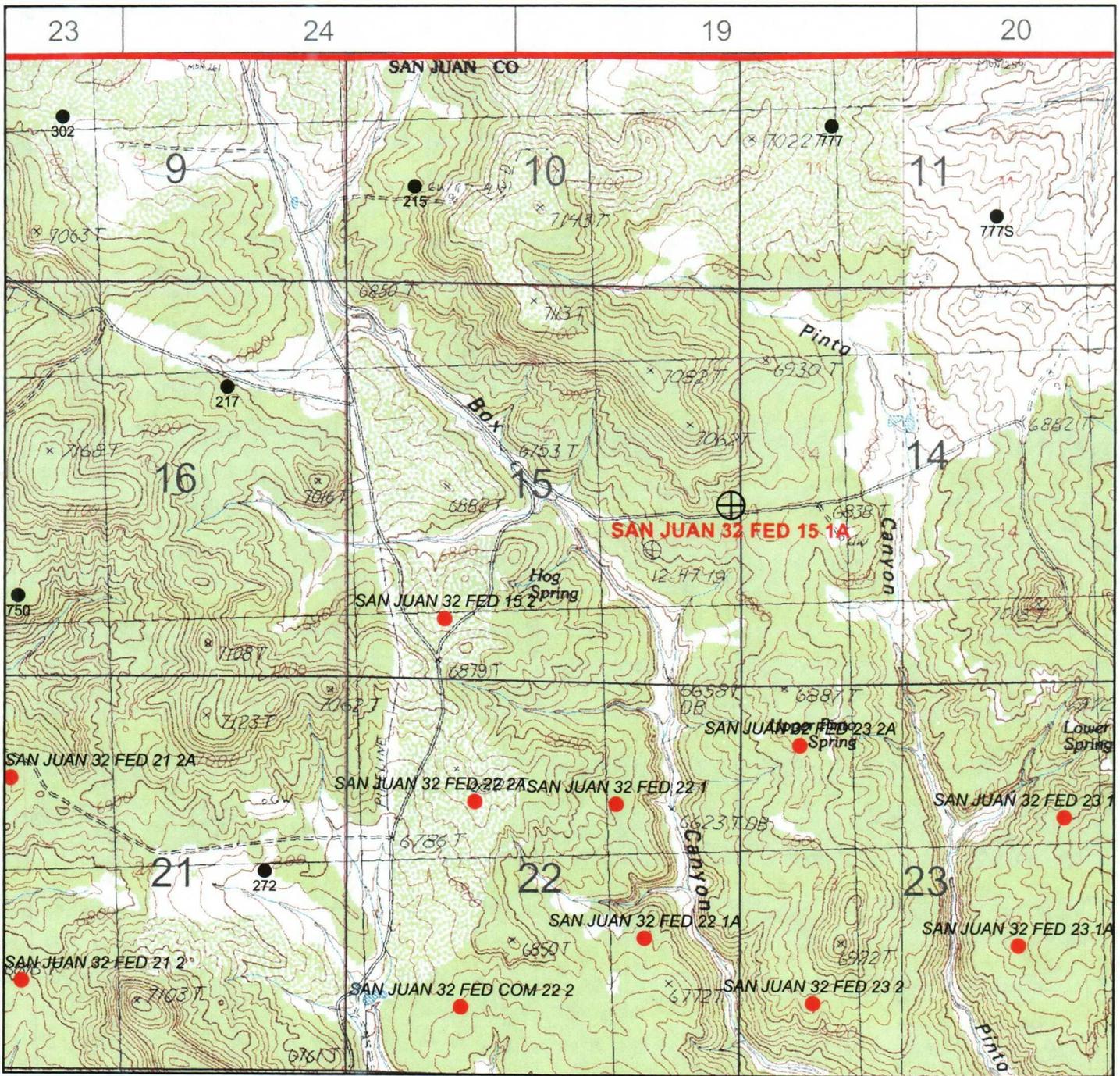
There are currently no other wells present in the SE/4 Section 15 therefore there is no opportunity to drill from an existing well pad or expand an existing well pad. A horizontal well is not recommended due to the presence of multiple coal seams. Differential pressure between the multiple coal seams, completion problems, operational problems, and anticipated high water production (over 60 bbls/day) preclude the drilling of a deviated well.

ConocoPhillips respectfully requests that a non-standard location for the Fruitland Coal well be issued for the reasons cited above. If there are any questions concerning this application, please feel free to call at (832)-486-2326.

Sincerely,


Deborah Marberry
Regulatory Analyst
ConocoPhillips
Attachments

Non Standard Plat for "San Juan 32 Fed 15 1A"



ConocoPhillips

- ⊕ Proposed Location
- COP Operated FC Wells
- Non Operated FC Wells



San Juan Basin, N. M.

San Juan 32 Fed 15 1A

T32N R9W Section 15
2434' FSL & 120' FEL

Author: Angela Whitfield	Date: 2-4-05
Compiled by:	Scale: 1"=2000'
MD File:	



ConocoPhillips Company
Deborah Marberry
Regulatory Analyst
Mid-America Business Unit
Lower 48
WL3 - 8108
P.O. Box 2197
Houston, TX 77252
Phone: 832-486-2326
Fax: (832) 486-2764

February 18, 2005

Burlington Resources Oil & Gas
Attn: Ben
P.O. Box 4289
Farmington, NM 87401

Re: Application for Non-Standard Location (waiver)
Basin Fruitland Coal
San Juan 32 Fed 15 # 1A
Unit Letter I, Section 15 T32N-R9W
2434' FSL and 120' FEL
San Juan County, New Mexico

Ben:

ConocoPhillips Company is making application to the New Mexico Oil Conservation Division for approval of a non-standard location for the above referenced well in the Basin Fruitland Coal Pool. We are respectfully requesting a waiver of objection to the proposed location from you. A copy of ConocoPhillips application is attached for your information.

If you agree to this waiver, please indicate below and return a copy to me via fax at (832) 486-2764. If you have any questions you can reach me at (832) 486-2326 or at deborah.marberry@conocophillips.com.

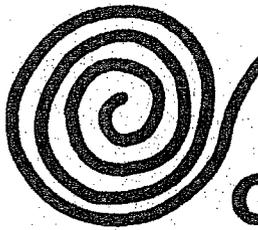
Sincerely yours,


Deborah Marberry
Regulatory Analyst
ConocoPhillips Company

Burlington Resources has received ConocoPhillips Company application for a non-standard location for the San Juan 32 Fed 15 # 1A and hereby waives objection to the proposed location.

Burlington Resources Oil & Gas

By: WB Me 2-18-05
Title: Sr. landman
Date: 2-18-05



**LA PLATA
ARCHAEOLOGICAL
CONSULTANTS**

January 10, 2005

Ms. Vicki Westby
ConocoPhillips Company
4001 Pembroke, Suite 313
Odessa, TX 79762

RE: Proposed SJ 32-Fed 15 #1A well pad

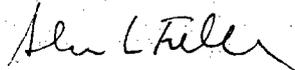
Dear Vicki:

The SJ 32 Fed 15 #1A well pad took considerable effort to stake due to numerous archaeological sites being within the SE 1/4 of the section. As you know, the well is staked 120 FEL and this was because there is a site several hundred feet to the west, another site several hundred feet to the southwest, and a previously recorded site directly south of the staked location. We tried to skip west past these sites, but the topography drops off steeply throughout the W 1/2 of the SE 1/4. We also tried an area very close to the SE corner of the section (probably also nonstandard), but there was another site there.

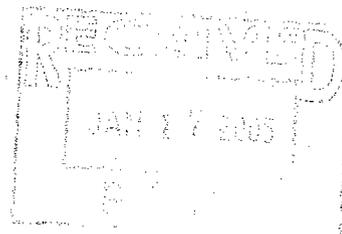
In my opinion, the current well location is staked about as far west as possible, given the presence of the various sites and the situation with topography further to the west.

Let me know if you have any further questions concerning this matter.

Sincerely,



Steven L. Fuller



State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-102
Revised June 10, 2003
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

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

AMMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code 71629	Pool Name BASIN FRUITLAND COAL (GAS)
Property Code	Property Name SAN JUAN 32 FED	Well Number 15 #1A
OGRID No. 217817	Operator Name CONOCOPHILLIPS COMPANY	Elevation 6850

Surface Location

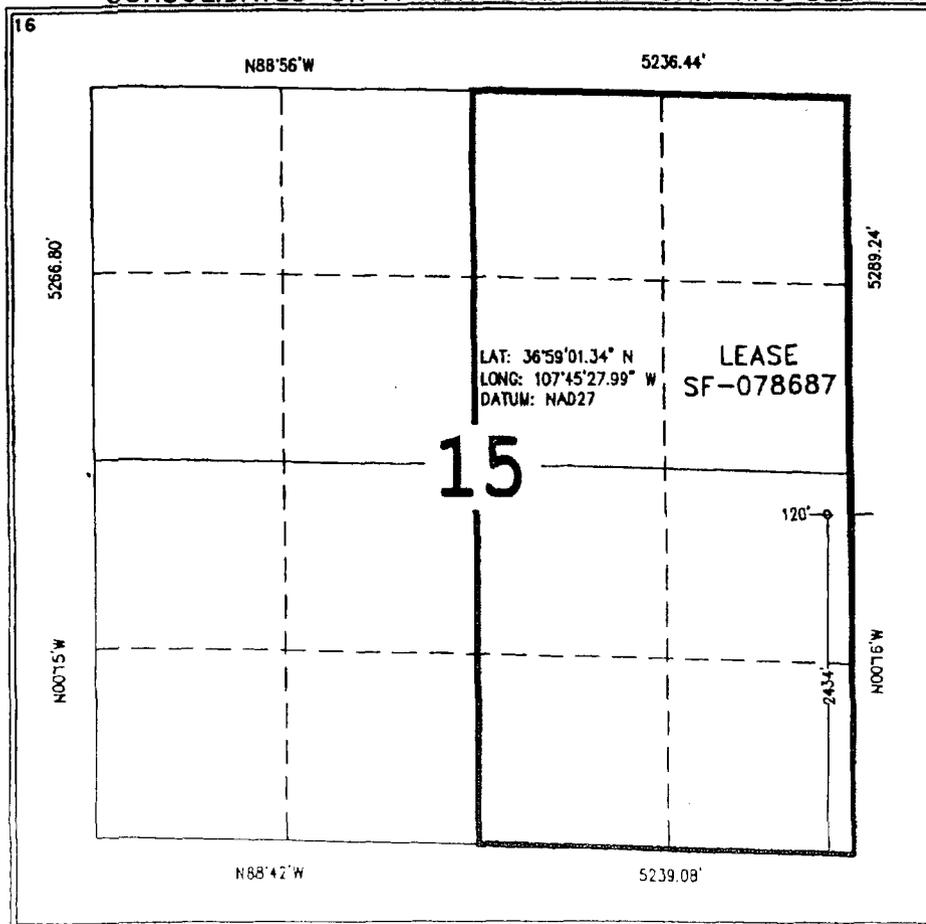
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
1	15	32N	09W		2434	SOUTH	120	EAST	SAN JUAN

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

Dedicated Acres 317.55	Joint or Infill	Consolidation Code	Order No.
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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

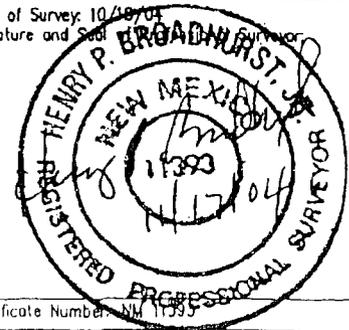
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Signature
Vicki Westby
 Printed Name
Staff Agent
 Title and E-mail Address
 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: 10/10/03
 Signature and Seal



Certificate Number: NM 11399

CMD : ONGARD
 OG5SECI INQUIRE LAND BY SECTION

Sec : 15 Twp : 32N Rng : 09W Section Type : NORMAL

4 39.59 Federal owned	3 39.63 Federal owned	2 39.67 Federal owned	1 39.71 Federal owned
5 39.59 Federal owned	6 39.63 Federal owned	7 39.67 Federal owned	8 39.71 Federal owned
12 39.59 Federal owned	11 39.63 Federal owned	10 39.67 Federal owned	9 39.72 Federal owned
13 39.60 Federal owned	14 39.64 Federal owned	15 39.68 Federal owned	16 39.72 Federal owned

158.76

158.79

317.55