

5/23/05 DATE IN	6-13-05 SUSPENSE	STOGNER ENGINEER	5.23.05 LOGGED IN	NSL TYPE	DSEM0514341959 APP NO.
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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



RECEIVED
 MAY 23 2005
 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.

Deborah Marberry / Deborah Marberry / Regulatory Analyst / 5/18/05
 Print or Type Name / Signature / Title / Date
 Deborah.marberry@conceophillips.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

May 11, 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 31-6 #209A
Unit Letter D, Section 1 T30N-R7W
816' FNL & 435' FWL
Rio Arriba County, New Mexico

30-039-29453

Mr. Stogner:

ConocoPhillips plans to drill the San Juan 31-6 209A located 816' FNL and 435' FWL, Section 1, T30N, R7W, Rio Arriba County, New Mexico in 2005. The well will be drilled to access Fruitland Coal reserves in the NW/4 of Section 1. The current reservoir pressure in the area is 100-200 psi. The infill well is required complete drainage of remaining Fruitland Coal reserves, and to protect our acreage from offset drainage where infill wells are being drilled. The proposed location is non-standard to the drill block to the west, which is operated by Devon.

Due to the extensive archaeological presence (see attached surveyor letter) in the NW/4 of Section 1, the well surface location at 816' FNL and 435' FWL is required. There is one Mesaverde well, SJ 31-6 6A, present in the NW/4 of Section 1, but it is too close (about 1000') to the existing Fruitland Coal well, SJ 31-6 209, for optimal reservoir development of the Fruitland Coal. 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 higher costs in this low-pressure area 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 Janet Stasney, Senior Reservoir Engineer, at (832)-486-2359.

Sincerely,


Deborah Marberry
Regulatory Analyst

Attached:
Topo map
Surveyor letter
Plat

Devon Energy
Attn: Jan Wooldridge
20 N. Broadway Suite 9.33
Oklahoma City, OK 73102

The above operators were notified via certified mail.

7002 3150 0001 5961 8806

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ <input type="text"/>
Certified Fee	<input type="text"/>
Return Receipt Fee (Endorsement Required)	<input type="text"/>
Restricted Delivery Fee (Endorsement Required)	<input type="text"/>
Total Postage & Fees	\$ <input type="text"/>

31-6 209A

Postmark Here

Sent To	
DEVON ENERGY ATTN: J. WOOLDRIDGE	
<i>Street, Apt. No., & P.O. Box</i> BROADWAY SUITE 9.33	
<i>City, State, ZIP+4</i> OKLAHOMA CITY, OK 73102	

PS Form 3800, June 2002 See Reverse for Instructions

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 31328	Property Name SAN JUAN 31-6 UNIT	Well Number 209A
OGRID No. 217817	Operator Name CONOCOPHILLIPS COMPANY	Elevation 6560

Surface Location

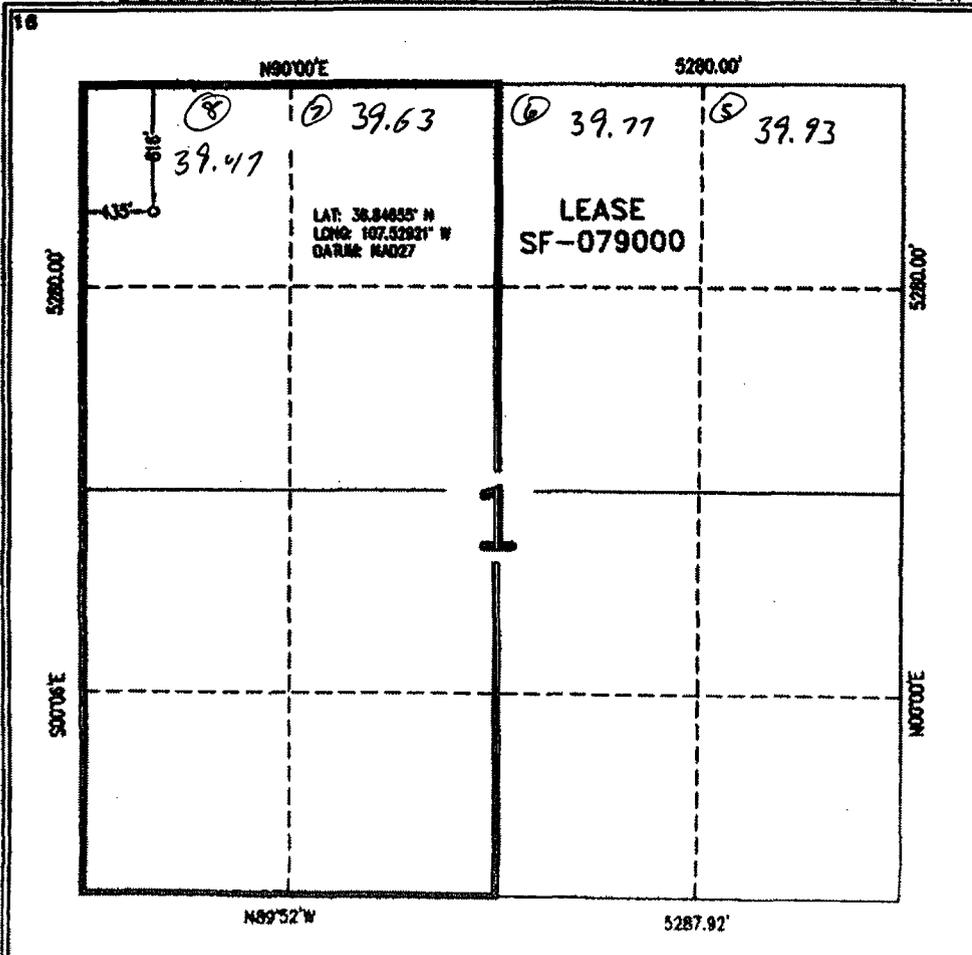
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the North/South line	Feet from the East/West line	County
D	1	30N	07W		816'	435'	RIO ARRIBA

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 W/2 319.1	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



OPERATOR CERTIFICATION

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

Vicki Westby
Signature

Vicki Westby
Printed Name

Staff Agent
Title and E-mail Address

February 7, 2005
Date

SURVEYOR CERTIFICATION

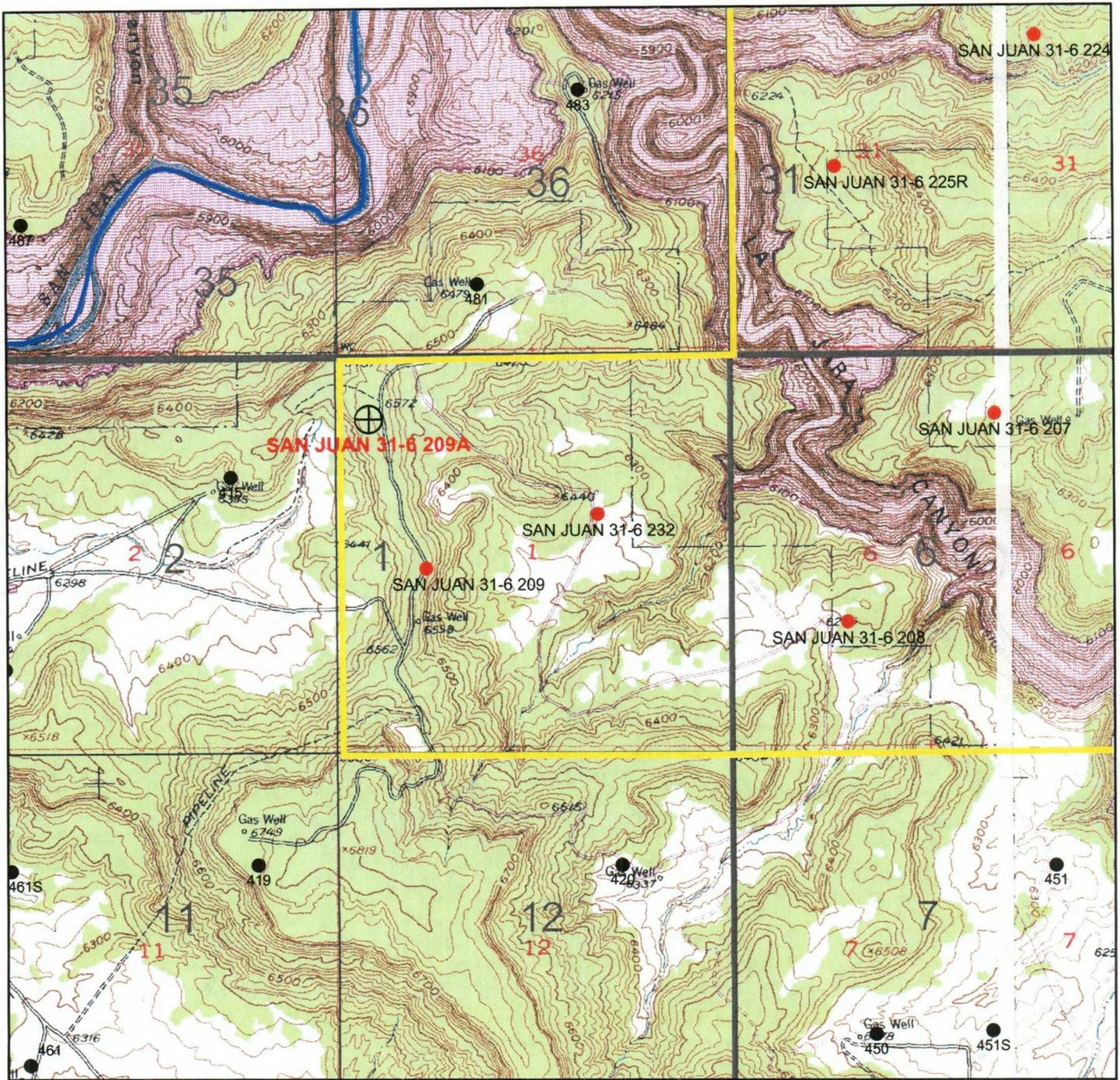
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey: 11/08/04

Signature and Seal of Professional Surveyor:

Certificate Number: AN 11383

Non Standard Plat for "San Juan 31-6 209A"



ConocoPhillips

- ⊕ Proposed Location
- Non Operated FC Wells
- COP Operated FC Wells
- Company Operated Federal Units



San Juan Basin, N. M.

San Juan 31-6 209A

T30N R7W Section 1
816' FNL & 435' FWL

Author: Angela Whitfield	Date: 2-11-05
Compiled by:	Scale: 1"=2000'
MD File:	

CCI

Chenault Consulting, Inc.
P.O. Box 282
Bloomfield, NM 87413
(505) 599-3456

**Re: San Juan 31-6 #209A
816 FNL 435 FWL
Section 1, T30N R7W
Rio Arriba Co., NM**

To Whom It May Concern:

The San Juan 31-6 #209A , a proposed Basin Fruitland Coal well, is located inside a Federal Unit. This well was staked at only 435 feet from the west line of Section 1, T30N R7W because the archaeology and terrain within the “drilling window” does not allow an appropriate site for drilling a new Basin Fruitland Coal well at a standard location. The extensive archaeological presence in the area was the primary reason for staking this well at a non-standard location. The only other area in the quarter section that did not have archaeological material present was in an area where the variations in elevation and the number of prominent drainages did not allow for a standard location staking. If anyone has any questions or would like to field review the proposed well location please contact me at 505-599-3456.

Sincerely,

Gordon Chenault



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

Devon Energy
Attn: Jan Wooldridge
20 N. Broadway Suite 9.33
Oklahoma City, OK 73102

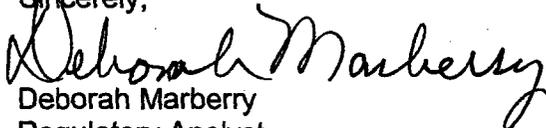
Re: Application for Non-Standard Location
Basin Fruitland Coal
San Juan 31-6 #209A
Unit Letter D, Section 1 T30N-R7W
816' FNL & 435' FWL
Rio Arriba County, New Mexico

To Whom It May Concern:

ConocoPhillips proposes to drill the above well in a non-standard location. As an offset operator to this well we are required to notify you of our intent. Attached is our application to the New Mexico Oil Conservation Division.

If you have any questions or need additional information please contact me.

Sincerely,


Deborah Marberry
Regulatory Analyst

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0136
Expires November 30, 2000

APPLICATION FOR PERMIT TO DRILL OR REENTER

1a. Type of Work: <input checked="" type="checkbox"/> DRILL <input type="checkbox"/> REENTER		5. Lease Serial No. SF-079000
1b. Type of Well: <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other <input type="checkbox"/> Single Zone <input checked="" type="checkbox"/> Multiple Zone		6. If Indian, Allottee or Tribe Name
2. Name of Operator CONOCOPHILLIPS COMPANY Contact: VICKI WESTBY E-Mail: Vicki.R.Westby@conocophillips.com		7. If Unit or CA Agreement, Name and No.
3a. Address 4001 PENBROOK ODESSA, TX 79762	3b. Phone No. (include area code) Ph: 915.368.1352	8. Lease Name and Well No. SAN JUAN 31-6 UNIT 209A
4. Location of Well (Report location clearly and in accordance with any State requirements. *) At surface NWNW 816FNL 435FWL At proposed prod. zone NWNW 816FNL 435FWL		9. API Well No. 30-039-29453
14. Distance in miles and direction from nearest town or post office*	15. Distance from proposed location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any)	10. Field and Pool, or Exploratory BASIN FRUITLAND COAL
16. No. of Acres in Lease 319.10	17. Spacing Unit dedicated to this well 319.1 w/p	11. Sec., T., R., M., or Blk. and Survey or Area Sec 1 T30N R7W Mer NMP 0
18. Distance from proposed location to nearest well, drilling, completed, applied for, on this lease, ft.	19. Proposed Depth 3573 MD	12. County or Parish RIO ARRIBA
21. Elevations (Show whether DF, KB, RT, GL, etc.) 6560 GL	22. Approximate date work will start	13. State NM
23. Estimated duration		

24. Attachments

The following, completed in accordance with the requirements of Onshore Oil and Gas Order No. 1, shall be attached to this form:

- Well plat certified by a registered surveyor.
- A Drilling Plan.
- A Surface Use Plan (if the location is on National Forest System Lands, the SUPO shall be filed with the appropriate Forest Service Office).
- Bond to cover the operations unless covered by an existing bond on file (see Item 20 above).
- Operator certification
- Such other site specific information and/or plans as may be required by the authorized officer.

25. Signature (Electronic Submission)	Name (Printed/Typed) VICKI WESTBY Ph: 915.368.1352	Date 02/09/2005
Title AGENT		
Approved by (Signature) <i>[Signature]</i>	Name (Printed/Typed)	Date 3-24-05
Title AFM		
Office FFD		

Application approval does not warrant or certify the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.
Conditions of approval, if any, are attached.

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

Additional Operator Remarks (see next page)

Electronic Submission #53928 verified by the BLM Well Information System
For CONOCOPHILLIPS COMPANY, sent to the Farmington

FIELD C104 FOR NSL

✓ ** OPERATOR-SUBMITTED ** OPERATOR-SUBMITTED ** OPERATOR-SUBMITTED **

NMOCD

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-039-29453		Pool Code 71629		Pool Name BASIN FRUITLAND COAL (GAS)			
Property Code 31328		Property Name SAN JUAN 31-6 UNIT				Well Number 209A	
OGRID No. 217817		Operator Name CONOCOPHILLIPS COMPANY				Elevation 6560	
Surface Location							
UL or lot no. D	Section 1	Township 30N	Range 07W	Lot Idn 816'	Feet from the North/South line NORTH	Feet from the East/West line 435'	County RIO ARRIBA
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 W/2 319.1		Joint or Infill		Consolidation Code		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

OPERATOR CERTIFICATION
 I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.
Vicki Westby
 Signature
Vicki Westby
 Printed Name
Staff Agent
 Title and E-mail Address
February 7, 2005
 Date

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: 11/08/04
 Signature and Seal of Professional Surveyor:

 Certificate No. 11789

Submit 3 Copies To Appropriate District Office
 District I
 1625 N. French Dr., Hobbs, NM 88240
 District II
 1301 W. Grand Ave., Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 May 27, 2004

OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE 'APPLICATION FOR PERMIT' (FORM C-101) FOR SUCH PROPOSALS.)		WELL API NO. 5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input type="checkbox"/>
1. Type of Well: Oil Well <input type="checkbox"/> Gas Well <input checked="" type="checkbox"/> Other	6. State Oil & Gas Lease No.	
2. Name of Operator ConocoPhillips Company	7. Lease Name or Unit Agreement Name SAN JUAN 31-6 UNIT	
3. Address of Operator 4001 Penbrook, Odessa, TX 79762	8. Well Number 209A	9. OGRID Number 217817
4. Well Location Unit Letter <u>D</u> <u>816</u> feet from the <u>North</u> line and <u>435</u> feet from the <u>West</u> line Section <u>I</u> Township <u>30N</u> Range <u>7W</u> NMPM Rio Arriba County	10. Pool name or Wildcat Basin Fruitland Coal	

11. Elevation (Show whether DR, RKB, RT, GR, etc.)
 6560 GL

Pit or Below-grade Tank Application Closure

Pit type DRILL Depth to Groundwater 80' Distance from nearest fresh water well >1 Mile Distance from nearest surface water 150'

Liner Thickness: _____ mil Below-Grade Tank: Volume _____ bbls; Construction Material _____

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL. <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 11.03. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

The pit will be constructed and closed in accordance with Rule 50 and as per the Nov. 1, 2004 Guidelines. See the attached diagram that details the location of the pit in reference to the proposed wellhead. The drill pit will be lined. The drill pit will be closed after the well has been completed. The solids left after the water has been disposed of will be sampled and NMOCD approval will be obtained prior to closure of this pit.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that any pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines a general permit or an (attached) alternative OCD-approved plan

SIGNATURE Vicki Westby TITLE Staff Agent DATE 2/9/2005

Type or print name For State Use Only E-mail address: Telephone No.

DEPUTY OIL & GAS INSPECTOR, DIST. 09 **MAR 28 2005**

APPROVED BY: [Signature] TITLE: _____ DATE _____
 Conditions of Approval (if any): _____

San Juan 31-6 #209A
OFFSET OPERATOR PLAT

816' FNL; 435' FWL

TOWNSHIP 30 NORTH, RANGE 7 WEST

Devon Energy	Devon Energy	Devon Energy
Devon Energy	●	ConocoPhillips
Devon Energy		ConocoPhillips