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NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



RECEIVED

MAY 29 2003

Oil 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.

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 218A (Sec25/T31N/R6W, 2315' fsl & 860' fel, Rio Arriba County, New Mexico)***

Dear Ms. Wrotenbery,

Williams Production Company is requesting an administrative approval to construct the Rosa 218A 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 256A to the northwest, the Rosa 218 to the southwest and the Rosa 233 to the east . (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/nsftc218A

District I
 PG Box 1980, Hobbs, NM 88241-1980

State of New Mexico
 Energy, Minerals & Natural Resources Department

Form C-102
 Revised February 21, 1994

District II
 PO Drawer DD, Artesia, NM 88211-0719

Submit to Appropriate District Office
 State Lease - 4 Copies
 Fee Lease - 3 Copies

District III
 1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
 PO Box 2088
 Santa Fe, NM 87504-2088

AMENDED REPORT

District IV
 PO Box 2088, Santa Fe, NM 87504-2088

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 218A
OGRID No. 120782	Operator Name WILLIAMS PRODUCTION COMPANY		Elevation 6385'

¹⁰ Surface Location

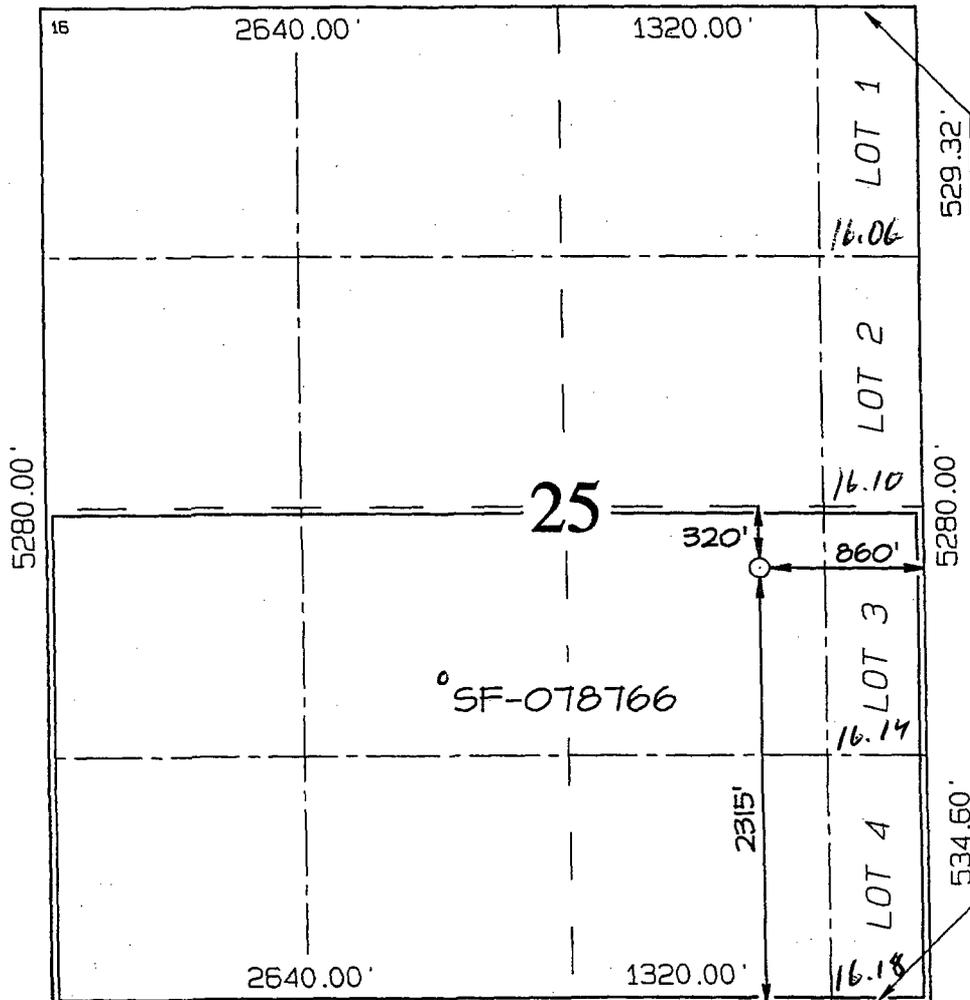
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
J	25	31N	6W		2315	SOUTH	860	EAST	RIO ARRIBA

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 272.16	272.32 Acres	S/2	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ 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 hereon is true and complete to the best of my knowledge and belief.

Signature: *John C. Thompson*
 Printed Name: John C. Thompson
 Title: AGENT / ENGINEER
 Date: 4/25/03

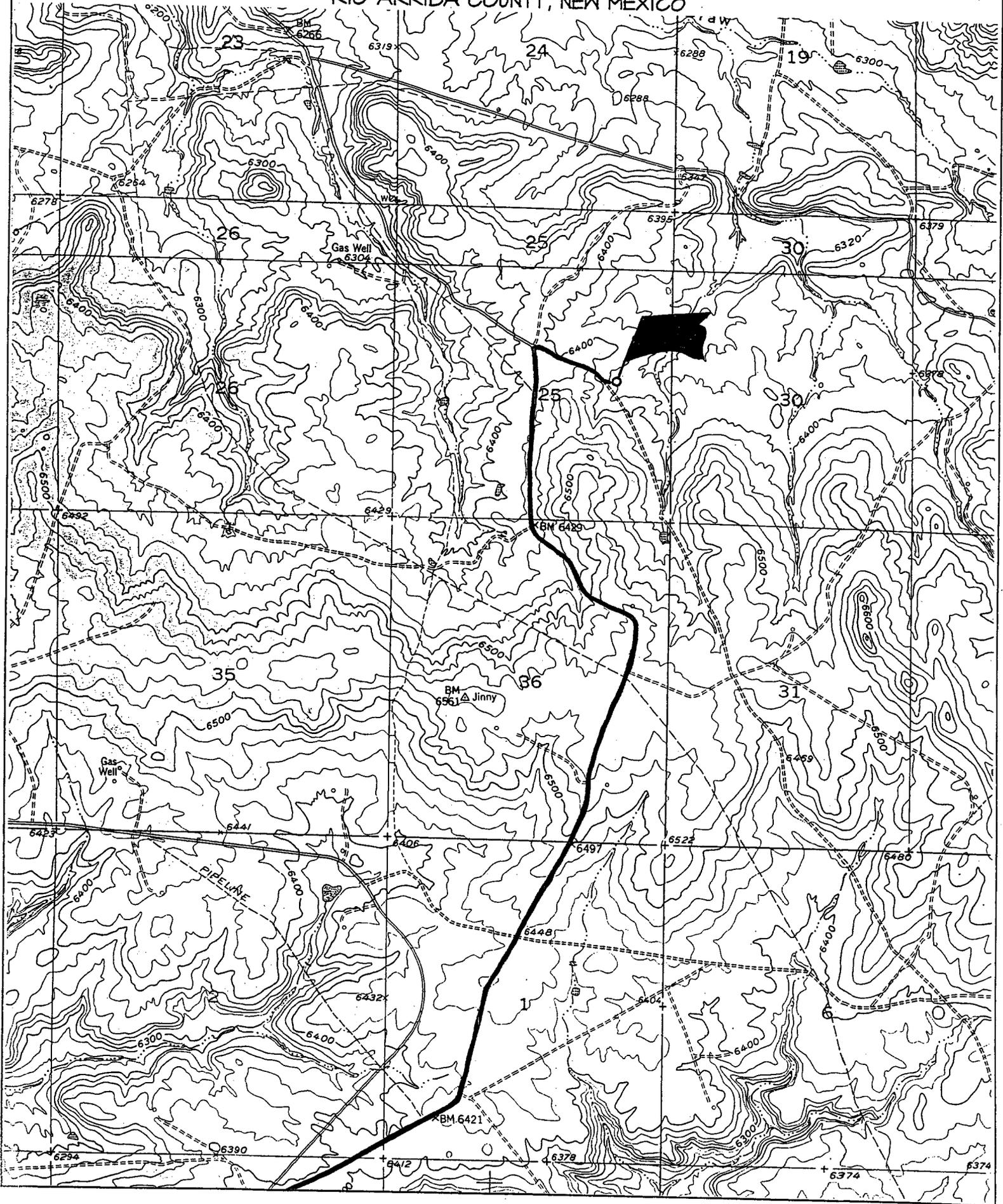
¹⁸ SURVEYOR CERTIFICATION
 I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

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

JASON C. EDWARDS
 REGISTERED PROFESSIONAL SURVEYOR
 NEW MEXICO
 15269

JASON C. EDWARDS
 Certificate Number 15269

WILLIAMS PRODUCTION COMPANY ROO UNIT #218A
2315' FSL & 860' FEL, SECTION 25, T31N, R6W, N.M.P.M.
RIO ARRIBA COUNTY, NEW MEXICO





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

May 19, 2003

Sacramento Municipal Utility District
PO Box 15830
Sacramento, CA 95852-1830
Attn: Barry Brunelle

Re: Non-Standard Location Waiver
Proposed Rosa Unit #218A Fruitland Formation
2,315' FSL & 860' FEL
S/2 Sec. 25,T31N,R6W
Rio Arriba County, New Mexico

Dear Mr. Brunelle:

William Production Company, as Rosa Unit Operator, plans to drill the Rosa Unit #218A Fruitland formation well to be located 2,315' FSL and 860' FEL of Sec.25,T31N,R6W (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 #218A 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 #218A Fruitland formation well Non-Standard location waiver approved:

Sacramento Municipal Utility District

By: Barry Brunelle

Date: 5-27-03