Overnight Mail

Bonneville Fuels Corporation

A Subsidiary of Bonneville Pacific Corporation

August 28, 1990

Mr. Michael Stogner
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe. NM 87503

/ /993

Re: Fullerton Federal #14-33 Well

2420' FSL, 189' FEL Section 14, T27N-R11W

San Juan County, New Mexico

Gentlemen:

Bonneville Fuels Corporation hereby respectfully requests administrative approval for the captioned non-standard gas well location in the Pictured Cliffs Pool. This request is submitted in triplicate and is due to the extreme nature of the topography and the fragile soil conditions found within the legal well location windows according to New Mexico Oil Conservation Division Rules.

To address each requirement regarding the "Submittal Guidelines for Administrative Approval of Non-Standard Location Applications" (copy enclosed), Bonneville submits herewith the following for your approval of the subject non-standard location:

- I. The well is located on BLM Surface. Copy of Application for Permit to Drill package enclosed.
- II. C-102 enclosed
- III. A. Land plat enclosed
 - B. Certification enclosed
- IV. A. & B. Shown on enclosed topo map.
 - C. Existing well pads are shown on enclosed topo map. The closest pad is approximately 1900' away and with a projected 2075' TD. The use of such a pad is impractical.
- V. Enlarged topo map enclosed
 - A. Badlands type topography within circled area which encompasses all orthodox windows. The terrain is very steep with unstable clay and sandy soils.
 - B. Access roads to unorthodox location would also traverse rough terrain as displayed in IV A.
 - C. N/A
 - D. N/A
 - E. Rough terrain as per V. A.

VI. N/A

New Mexico Oil Conservation Division August 28, 1990 Page 2

- VII. See V. A. above and orthodox windows were rejected by the BLM Farmington Resource Area.
- VIII.In order to reach a legal location, the well would have a bottom hole location approximately 400' to the southeast. Drilling cost would increase approximately 25 30% which would render this well economically unfeasible.
- IX. Copy of affidavit enclosed. No offset owner/operator notification required.

If you have any questions or require anything further, please contact the undersigned at (303) 863-1555.

Very truly yours,

BONNEVILLE FUELS CORPORATION

L. D. Lillo Senior Landman

cc/Oil Conservation Division 1000 Rio Brazos Aztec, NM 87410

NEW MEXICO OLL CONSERVATION DIVISION

SUBMITTAL GUIDELINES FOR ADMINISTRATIVE APPROVAL OF NON-STANDARD LOCATION APPLICATIONS

- I. If the well is located on Federal or Indian Lands, the Federal Surface Management Agency must be notified and an on-site inspection conducted prior to filing the application. If an Application for Permit to drill or a Notice of Staking has been prepared, a copy must be submitted.
- II. Completed C-102 showing the well location, proration unit, leases within the unit and other required information.
- III. Land plat showing offset operators and working interest owners and any offsetting wells producing from the same pool or formation.
 - A. This information may be shown on the topo map if it does not impair the readability of the map.
 - B. The operator should certify that the information is current and correct.
- IV. Original or clear copy of topographic map, preferably 7.5 minute quad, showing contours and other mapped features impacting the location, with the following information marked thereon (In order to be able to adequately show all of the necessary surface conditions it may be necessary to enlarge the relevant portion of the topo map to provide room for detail):
 - A. The proposed well location and proration unit;
 - B. An outline of the orthodox drilling windows as provided in the applicable rules for the subject application;
 - C. The location of any wells to any formation within the area of the proration unit and a statement as to whether an existing pad can be used to drill the proposed well;
- V. An enlargement of the topo map showing the subject area with the applicable additional information:
 - A. Terrain features not shown on the map which make an orthodox location unusable:
 - B. Proposed access roads and pipelines if they affect the location selection;
 - C. The location of any surface uses which prevent use of a legal location;

- D. The location of any archeological sites identified in the archeological survey;
- E. The location and nature of any other surface conditions which prevent the use of an orthodox location.
- VI. If archeological sites are a reason for the unorthodox location request, a copy of the archeological survey, or a summary, identifing sites which cannot be disturbed or which must have any disturbance mitigated. In addition, the location of such areas should be marked on the enlarged topo so they can be clearly identified.
- VII. A narrative report of any on-site inspection of the potential locations. If such on-site has resulted in elimination of legal locations due to surface conditions, such information should also be noted on the enlarged topo.
- VIII. A statement of why directional drilling to reach a legal bottom-hole location is not feasible.
- IX. An affidavit that notice has been sent to all parties entitled thereto, under the Divisions Rules and Regulations with return receipt cards showing date of receipt of notice.

Form 3160-3 (November 1983)

APPROVED BY

CONDITIONS OF APPROVAL, IF ANY:

REVISED APPLICATION

SUBMIT IN TRIPLICATE. UNITED STATES

(Other instructions on reverse side)

Form approved.
Budget Bureau No. 1004-0136
Explices August 31, 1985

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TEN POINT COMPLIANCE PLAN

Attached to Form 9-331C
Bonneville Fuels Corporation
Fullerton Federal #14-33
2420' FSL & 1995' FEL Sec. 14, T27N-R11W
San Juan County, New Mexico

1. GEOLOGIC NAME OF SURFACE FORMATION:

The surface formation at all locations is the <u>Nacimiento</u> Formation.

2. <u>ESTIMATED TOPS OF IMPORTANT GEOLOGIC MARKERS</u>: Ojo Alamo 752' Kirtland 875'

3. ESTIMATED DEPTHS OF ANTICIPATED WATER, OIL, GAS OR MINERALS:
Ojo Alamo 752' (Water)
Fruitland 1522' (Gas)
Pictured Cliffs 1817' (Gas)

4. CASING PROGRAM:

Hole		Casing	Weight, Grade
<u>Size</u>	<u>Depth</u>	OD	Joint, Condition Cement
12 1/4	300	8 5/8	24#, J-55, New 250 sx
			or used (inspected)
7 7/8	2075'	4 1/2	11.60#, J-55, New 500 sx
			or used (inspected)

5. MINIMUM SPECS FOR PRESSURE CONTROL: Reference is made to Exhibit 1 showing the blowout preventer stack and choke manifold.

The BOP equipment will be a class III system consisting of a double gate hydraulic type with 3,000 psi minimum working pressure, equipped with a set of blind rams, 4 1/2" drill pipe rams and annular preventer. A 2" choke manifold with pressure rating equivalent to the BOP stack will be connected to the spool below the pipe rams, along with a 2" kill line.

The BOP and choke manifold will be nippled up on the surface casing and hydraulically tested for thirty minutes prior to drilling out cement, and after any use under pressure. Pipe rams will be operationally checked each 24 hour period, and the blind rams operationally checked each time pipe is pulled from the hole. These checks will be noted on the daily drilling report.

Prior to drilling out surface casing will be tested with rig pump to 70% of the internal yield of the surface casing. Pipe rams will be tested with drill pipe in hole, prior to drilling cement plug with rig pump to 1000 psi.

6. PROPOSED DRILLING FLUIDS:

A Freshwater gel Mud System with solids control equipment will be run with mud properties as follows:

TYPE	MUD WEIGHT #/GEL	VISCOSITY	WATER LOSS
FGM	8.5 - 9.0 (or as reg'd.)	28-40 sec./qt.	8-20 cc

7. AUXILIARY WELL CONTROL AND MONITORING EQUIPMENT:

- A. A kelly cock will be used in the drillstring.
- B. A bit float will be used if severe lost circulation conditions exist.
- C. A stabbing valve will be available on the rig floor for immediate use when the kelly is not in the drillstring.

8. LOGGING, TESTING, AND CORING PROGRAM:

- A. The logging program will consist of GR/SP Dual Induction Spectral Density-Neutron log and GR/Caliper/Microlog from casing to total depth.
- B. No cores are planned.
- C. No drillstem tests are planned.

9. ABNORMAL CONDITIONS - PRESSURE - TEMPERATURE - POTENTIAL HAZARDS:

Normal pressures and temperatures are expected in the objective formation.

10. ANTICIPATED STARTING DATE AND DURATION OF OPERATIONS:

Road and location work will begin as soon as all approval has been granted by BLM. The anticipated spud date is October 1, 1990, subject to rig availability. Once commenced, drilling operations should be finished within 5 days. If the well is productive, an additional 5 days will be required for completion.

SURFACE USE AND OPERATING PLAN

Attached to Form 9-331C Bonneville Fuels Corporation Fullerton Federal #14-33 2420' FSL & 1995' FEL, Sec. 14, T27N-R11W San Juan County, New Mexico

1. EXISTING ROADS:

- A. The proposed well site and elevation plats are attached.
- B. To reach the wellsite, proceed from Broomfield, New Mexico south on Hwy. #44 approximately 10 miles to GCNM West Kutz Compressor Station. Turn left and proceed 200 yards, turn left (NNW) and proceed approximately 0.6 miles. Turn right and proceed approximately 0.7 miles to centerline flagging on the right.
- C. All roads to the location are shown in Exhibit #3 & #4. The existing roads described above are adequate for travel during the drilling and production activities.
- D. Not applicable.
- E. Existing roads, within a one-mile radius are shown on Exhibit #3.
- F. Existing roads are State of New Mexico and BLM controlled roads.

2. PLANNED ACCESS ROADS:

For the drilling and completion of the well approximately 1300' of new access road will be constructed as follows:

- A. The maximum width of the running surface of the proposed new access roads will be 14'. The road will be crowned and ditched. Ditches will be at a 3:1 slope and 2 feet wide. Water will be diverted, where possible to avoid ponding and maintain good drainage.
- B. The average grade will be 5% or less.
- C. No turnouts are planned.
- D. The drainage design will be consistent with local drainage patterns. Crown and ditching specified in #2A.
- E. One low water crossings will be needed.
- F. Surfacing material will consist of native surface soil. If this is not sufficient, additional required material

will be purchased from the dirt contractor.

- G. Gates, cattle guards or fence cuts will be done as appropriate, however, none should be required.
- H. The proposed access road as shown in Exhibit #3 has been centerline flagged by High Country Surveys of Farmington, New Mexico. Access road to be constructed is on federal surface.

3. LOCATION OF EXISTING WELLS:

For all existing wells within a one-mile radius of this well, see Exhibit #4.

- A. There are no water wells within a one-mile radius.
- B. There are two abandoned well within a one-mile radius.
- C. There is one temporarily abandoned wells within a one-mile radius.
- D. There are no disposal wells within a one-mile radius.
- E. There are no wells presently being drilled within a onemile radius. There are five proposed staked wells within a one-mile radius.
- F. There are seven producing wells within a one-mile radius.
- G. There are no shut-in wells within a one-mile radius.
- H. There are no injection wells within a one-mile radius.
- I. There are no monitoring or observation wells within a one-mile radius.

4. LOCATION OF EXISTING WELLS AND/OR PROPOSED FACILITIES:

- A. Owned or controlled by Lessee/Operator within 1 mile of Proposed Well:
 - (1) Tank Batteries: Seven
 - (2) Production Facilities: Seven
 - (3) Oil Gathering Lines: none
 - (4) Gas Gathering Lines: none
 - (5) Injection Lines: none
 - (6) Disposal Lines: none

- B. If the well is productive, contemplated facilities will be as follows:
 - (1) Production facilities will be located on solid ground of the cut area of drill pad. All facilities will be contained on the well pad.
 - (2) Refer to Exhibit #8 for the production facility schematic.
 - (3) Dependent upon flow test results, a gas separator, 210 barrel tank and meter house may be required. All flowlines and piping will be installed according to API specifications. Construction material will consist of surface soil. No additional material from outside sources are anticipated.

C. Rehabiliation Plans:

The plans for rehabilitation of the disturbed area no longer needed for operations after drilling and construction are completed are as follows:

- 1. The reserve pit will be backfilled after the contents of the pit are dry.
- 2. The area of the drill site not needed for production facilities will be recontoured to the natural contour as nearly as possible and revegetated/reseeded by the contour method. Seed specifications to be determined by BLM.
- D. In the event that production is established, plans for gas gathering lines will be submitted to appropriate governmental agencies for approval.

5. LOCATION AND TYPE OF WATER SUPPLY:

- A. Water will be purchased from a well located at the Hilltop Store on Hwy. #44 (Sec. 26, T27N-R11W).
- B. Water will be hauled by tank truck to the drilling site as needed.
- C. No water well will be drilled on or near this well location.

6. SOURCE OF CONSTRUCTION MATERIALS:

- A. No construction materials are anticipated to be needed for drilling the wells or constructing the access roads into the locations. Native soil will be utilized for the drilling sites and access roads. If necessary, the surface materials (rock, gravel, etc.) will be purchased from the dirt contractor.
- B. Native construction materials only may be taken from Federal lands.
- C. Native surface soil materials for construction of access roads are anticipated to be sufficient.
- D. Exhibits #3 and #4 shows access roads. Federal Land is involved.

7. METHODS OF HANDLING WASTE DISPOSAL:

- A. Cuttings not retained for evaluation purposes will be exhausted into the reserve pit (see Exhibit #5 & #6 for location).
- B. Drilling fluids will be contained in steel mud tanks. The reserve pits will contain any excess flow from the well during drilling, cementing, and completion operations. The reserve pit will be an earthen pit, approximately 75' x 45' x 8'.
- C. Produced water if any, will be disposed into a reserve pit or a tank (depending on the rates). Produced oil, although not anticipated, will be collected in tanks or disposed into the reserve pit, depending on the volume and frequency of occurance. If the volume of oil is sufficient during drilling, it will be trucked from the location. Water will be disposed of in the reserve pit.
- D. A portable chemical toilet will be provided on the location for human waste.
- E. Garbage and trash produced during drilling or testing will be handled in a trash cage. This garbage will be hauled to an approved disposal site after drilling is completed. Water and tailings will be disposed into the reserve pit. No toxic waste/chemicals will be produced by these proposed operations. If a trash cage is not available, a trash/burn pit will be constructed and fenced with woven wire.

F. After the rig moves out, all materials will be cleaned up and no adverse materials will be left on location. Any dangerous open pit will be fenced during drilling and kept closed until the pit has dried. All pits will be filled and the well site will be leveled and reseeded, this will occur when pits are dry enought to fill and as weather permits. Only that part of the pad required for producing facilities will be kept in use. In the event of a dryhole, only a dryhole marker will remain.

8. ANCILLARY FACILITIES:

No air strip, campsite or other facilities will be built during drilling and completion operations of this well.

9. WELL SITE LAYOUT:

- A. Refer to Exhibits #5 & #7 for the Drill Pad layout as staked. Cuts and fills have been indicated per exhibit #6 to show the planned cut across the proposed location. Topsoil will be stockpiled.
- B. Refer to Exhibit #7 for a planned location diagram of the proposed rig and drilling equipment, reserve pit, and pipe racks. No permanent living facilities are planned. There may be a trailer on site.
- C. The rig orientation, turn-around area, parking area, and access roads are shown in Exhibit #7.
- D. The reserve pit will be lined.

10. PLANS FOR RESTORATION OF SURFACE:

- A. Upon completion of the proposed operations, and if the well is to be abandoned, the location will be backfilled, leveled, and contoured to as near the original topography as is feasible as soon as the pits have dried enough to support earth moving equipment. The location will be reseeded. All spoils materials will be hauled to an approved disposal site upon completion of the drilling operation.
- B. Revegetation and rehabilitation will be achieved by reseeding utilizing the contour method with a seed mixture of native grasses.
- C. Prior to rig release, the reserve pit will be fenced to prevent livestock or wildlife from being entrapped. The fencing will be maintained until leveling and the clean-up accomplished.
- D. If any oil is on the pits and cannot be immediately removed after operations cease, the pit containing the

oil or other adverse substances will be overhead flagged and fenced. The entire location will be inspected for trash and other refuse, and additional clean-up will be done as deemed necessary.

E. Time to complete rehabilitation depends upon the time for pits to dry. Planting and revegetation should occur by Fall 1991.

11. OTHER INFORMATION

- A. Wellsite access road is located on the floor of the valley as well as a ridge tops. The soil is sandy. Vegetation consists of sage brush and range grasses. The area has a very sparse wildlife population.
- B. The wellsite and the access road to be built are on lands owned by U.S.A. The existing roads are BLM Right-of-way and state highway.
- C. Intermittent streams (i.e. flow during wet seasons of the year) do exist in the area.
- D. There are no reported restrictions or reservations noted on the oil and gas lease.
- E. Drilling is planned for October, 1990. It is anticipated that the casing point will be reached within 4 days after commencement of drilling.

12. LESSEE'S AND OPERATOR'S REPRESENTATIVE:

Bonneville Fuels Corporation 1600 Broadway, Suite 1110 Denver, CO 80202

(303) 863-1555

G. D. Gentry - Operations Supervisor

3005 Northridge, Suite C Farmington, NM 87401 (505) 325-1922

Norm Woods - Production Foreman

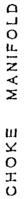
13. CERTIFICATION:

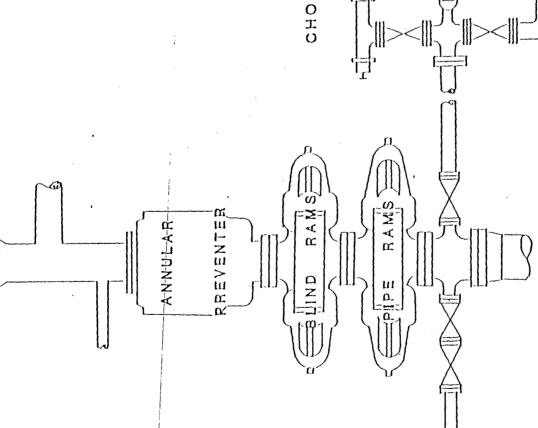
I hereby certify that I, or persons under my direct supervision, have inspected the proposed drillsite and access routes; that I am familiar with the conditions which currently exist; that the statements made in this plan are, to the best of my knowledge, true and correct; and that the work associated with operations proposed herein will be performed by Bonneville Fuels Corporation and its contractors and subcontractors in conformity with this plan.

Date:

G. D. Gentry

Operations Supervisor





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

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-102 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088 Santa Fe, New Mexico 87504-2088

DISTRICT II P.O. Drawer DD, Arteala, NM 88210

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

DISTRICT III
1000 Rio Brazos Rd., Aziec, NM 87410

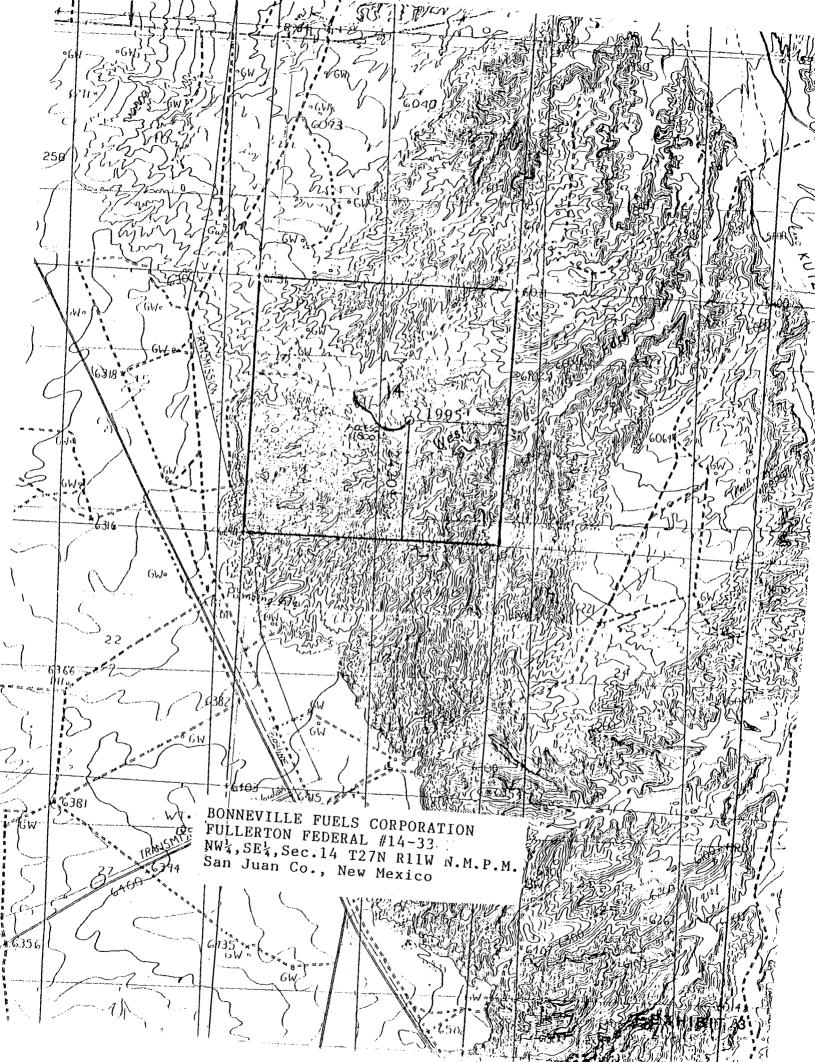
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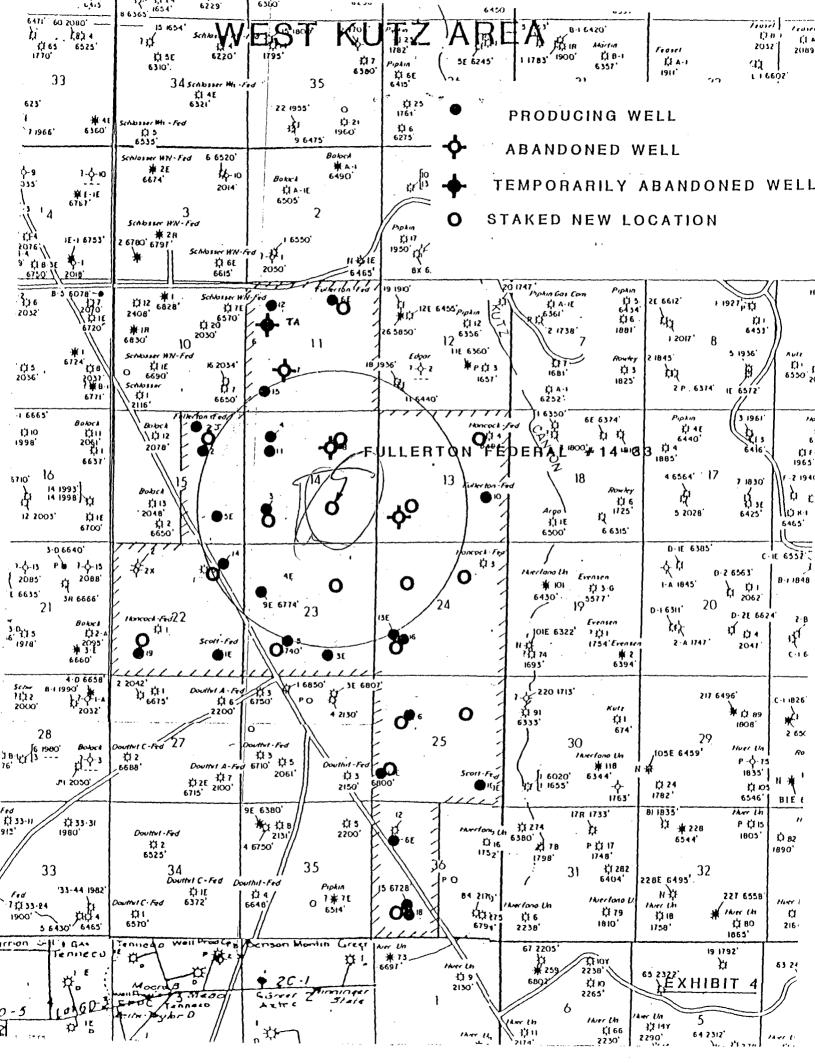
WELL LOCATION AND ACREAGE DEDICATION PLAT

000 Rio Brazos Rd., Aztec, NM 87410	All Distances must be	from the outer boundaries of the	section	•
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	OR PORATION	FULLERTON FED	ERAL	14-33
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1. Outline the acreage dedicated to th	e subject well by colored pe	neil or hachure marks on the plat be	ow.	I
2. If more than one lease is dedicated	to the well, outline each an	I identify the ownership thereof (bot	h as to working interest and	royalty).
3. If more than one lease of different unitization, force-pooling, etc.?	awaemah is aonawo ia m	e well, have the interest of all owner	в обен сонношным ну сони	INTRIUE-KION,
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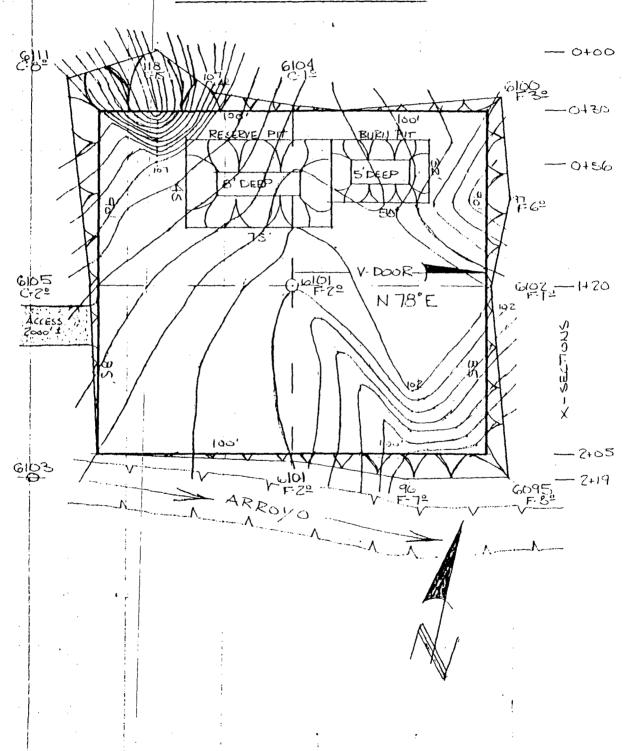


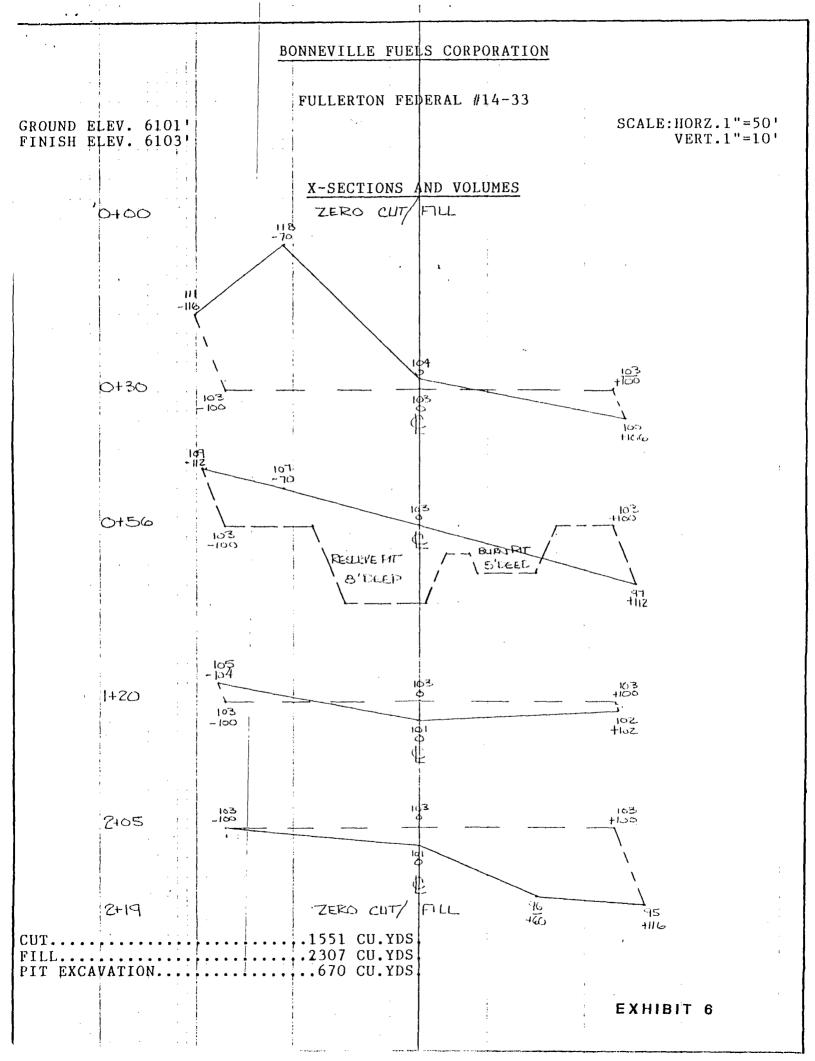
BONNEVILLE FUELS CORPORATION

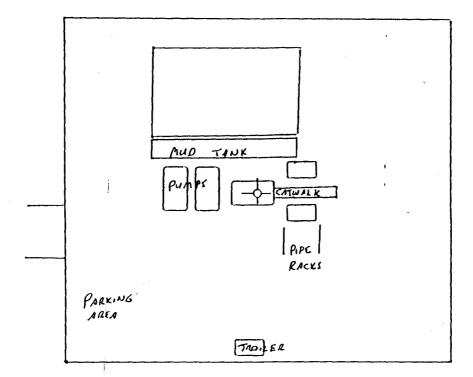
SCALE: 1"=50"

FULLERTON FEDERAL #14-33 2420 F/SL & 1995 F/EL Sec.14 T27N R11W N.M.P.M. San Juan Co., New Mexico CONTOUR INT.-1'

TOPOGRAPHY AND PAD LAYOUT

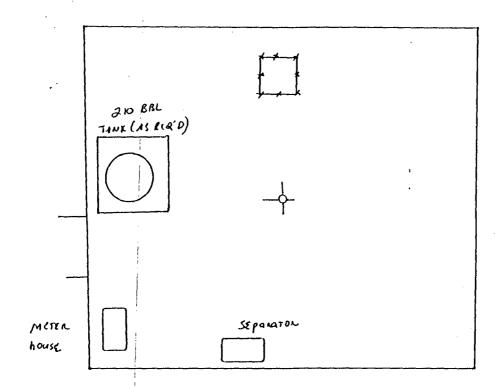








PRODUCTION FACILITY LAYOUT





Submit to Appropriate District Office State Lesse - 4 copies Fee Lesse - 3 copies State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102 Revised 1-1-89

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT III
1000 Rio Brazos Rd., Aziec, NM 87410

DISTRICT II P.O. Drawer DD, Artesla, NM 88210

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

WELL LOCATION AND ACREAGE DEDICATION PLAT

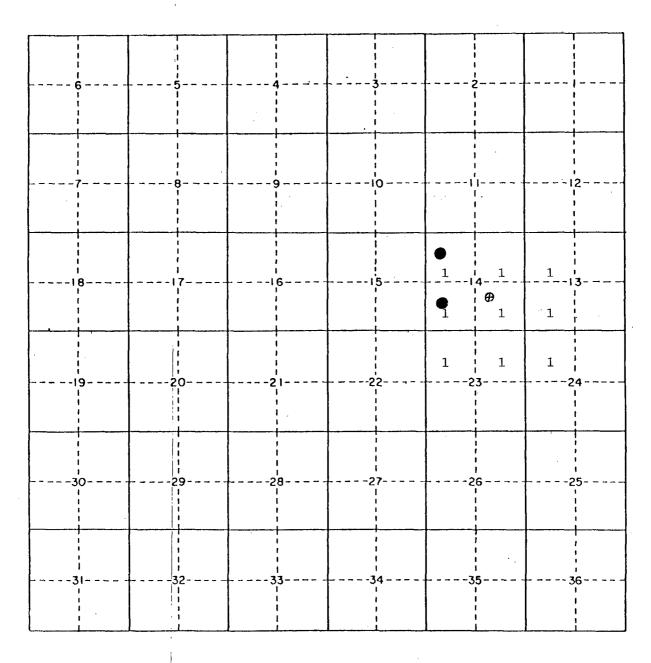
All Distances must be from the outer boundaries of the section

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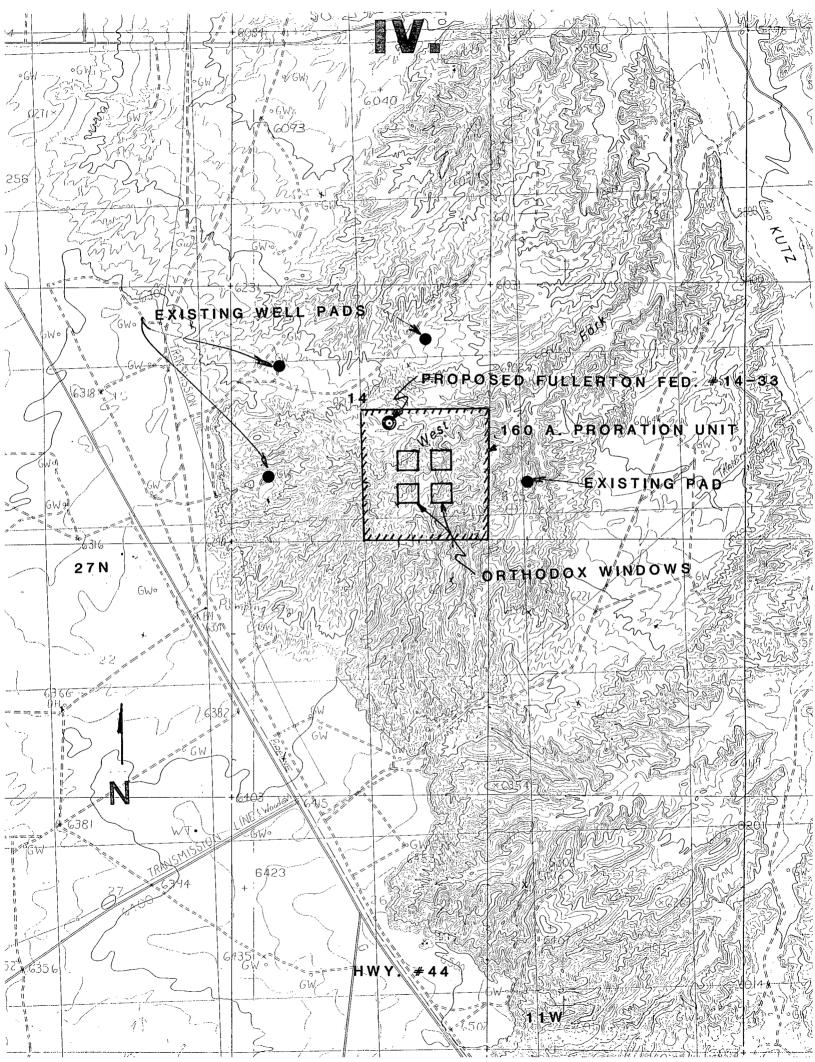
APPLICATION FOR NON-STANDARD LOCATION Fullerton Federal #14-33 Well

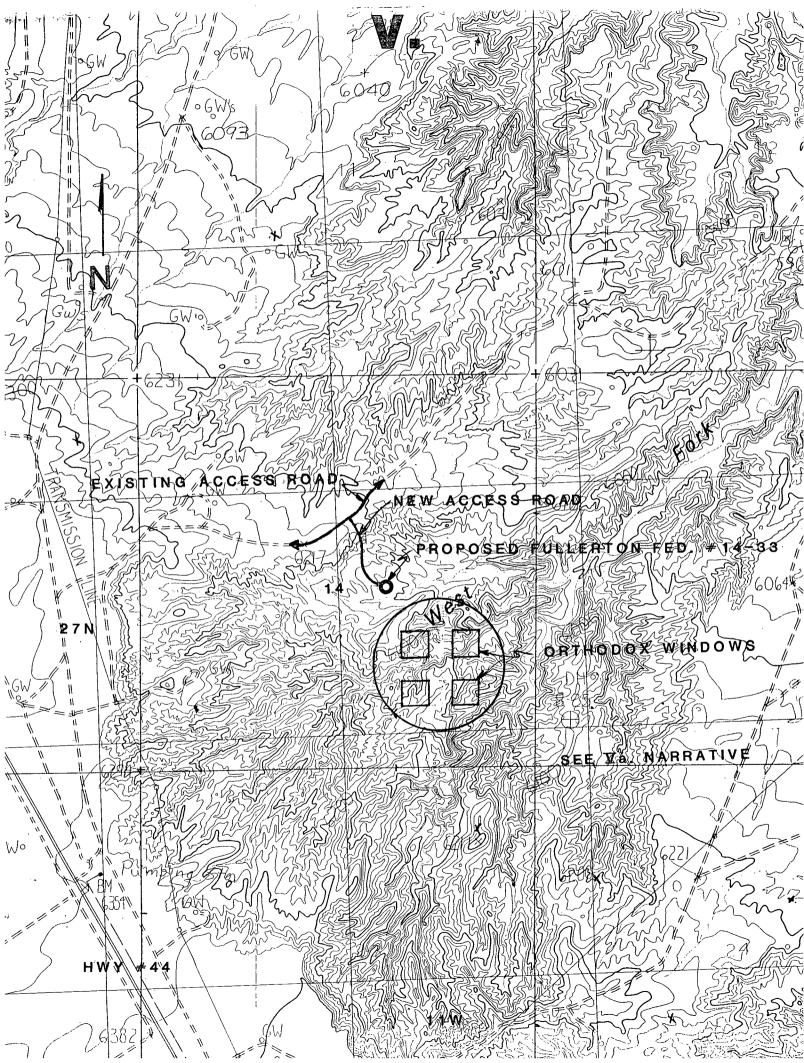
2420'FSL,	1995 FEL Section_	14	7	ownship_2	7N	Rang	ge	11W
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SCALE: | linch = | mile

- 1. Bonneville Fuels Corporation
- Existing Pictured Cliffs Formation Wells









United States Department of the Interior

BUREAU OF LAND MANAGEMENT FARMINGTON RESOURCE AREA 1235 La Plata Highway Farmington, New Mexico 87401

3162.5-1 (a) (019)

JUL, 1 3 1990

CERTIFIED - RETURN RECEIPT REQUESTED P 565 392 666

Bonneville Fuels Corporation Attn: Gerald Gentry 1600 Broadway, Suite 1110 Denver, CO 80202

Dear Mr. Gentry:

Fullerton Federal #14-34: Recommend the well location be moved to the NE/4 of the section for the Fruitland Coal or Pictured Cliffs formations to comply with the New Mexico Oil Conservation Division (NMOCD) spacing requirements and to better accommodate topographic relief; or move to the SW/4 and twin off of the existing #3 Fullerton Pictured Cliffs well if the proposed well is a Fruitland Coal.

Scott E. Federal #23-41: If this is a Fruitland Coal well it is recommended it be moved to the SW/4 of the section. However, if it is proposed to be a Fruitland/Pictured Cliffs well and remain in the NE/4 of section 23, then a full engineering design for the access road will be required, major reclamation stipulations will be required and a full environmental assessment (EA) will be conducted requiring a minimum of two or three months to complete.

Scott E. Federal #24-12: Recommend moving the well site to approximately 1850' FNL and 1850' FEL in section 24 or slightly unorthodox to accommodate the topography.

Scott E. Federal #25-12: Recommend moving the location to the existing access road to accommodate the topography, utilizing the existing access road as much as possible.

Scott E. Federal #25-23: Recommend moving to an unorthodox location by twinning off of the #11 E. Federal Scott or drilling a scant hole with a surface location near the #11 E. Federal Scott.

We will be available to discuss these recommendations and assist in location of suitable well sites. Should you have any questions, please contact Dale Wirth or Ilyse Gold at (505) 327-5344.

Sincerely,

Ron Fellows

Lor Area Manager



Fullerton Federal #14-33 Well 2420' FSL, 1995' FEL Section 14, T27N-R11W San Juan County, New Mexico

I hereby certify that Bonneville Fuels Corporation is the offset owner/operator for the above Pictured Cliffs gas well for which administrative approval for a non-standard location has been requested.

L. D. Lillo

August 28, 1990

City & County of Denver))ss. State of Colorado)

Subscribed and sworn to before me this <u>28th</u> day of <u>August</u>, 1990.

My commission expires: ____/-26-93

Notary Public

Address: 1600