

NSL

12/28/98



RICHARDSON OPERATING COMPANY

1700 Lincoln, Suite 1700
Denver, Colorado 80203 (303) 830-8000
FAX (303) 830-8009

December 3, 1998

DEC - 7 1998

Ms. Lori Wrotenbery
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Re: Application for Administrative Approval
Exception to Well Location Rule 104.C
San Juan County, New Mexico

Dear Ms. Wrotenbery:

Richardson Operating Company requests an exception to well location requirements of Section 104.C due to topographical conditions. In an effort to minimize surface disturbance, we plan to use the existing pad of a plugged and abandoned well, however, we are limited on the West by a cliff. As indicated on the attached plat, the WF Federal #29-1 well will pool the Pictured Cliffs and Fruitland Coal formations, and will be located 790 feet from the North line and 1410 feet from the East line. These footages comply with standard location rules for the Fruitland Coal formation, but as to the Pictured Cliffs, we will encroach upon an inner quarter-quarter boundary by forty feet. No offsetting operators and/or leases or mineral owners will be affected by the unorthodox location.

Enclosed for your reference are copies of the following:

1. Form C-102, Well Location and Acreage Dedication Plat, showing the subject spacing units and unorthodox well location.
2. USGS topographic map showing the topography condition.
3. Plat showing diagonal and adjoining wells. There are no affected parties.

Your prompt attention to our application is requested, as we have a drilling commitment requiring us to commence drilling operations by November 30, 1998.

Thank you very much for your assistance.

Sincerely,

RICHARDSON OPERATING COMPANY

Cathleen Colby

Cathleen Colby
Land Manager

District I
PO Box 1980, Hobbs, NM 88241-1980
District II
PO Drawer DD, Artesia, NM 88211-0719
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

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

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

| | | | | | |
|-------------------------------------|--|---|--|---|-----------------------|
| 1 APT Number 30-045-29737 | | 2 Pool Code | | 3 Pool Name Pictured Cliffs/Fruitland Coal | |
| 4 Property Code | | 5 Property Name WF Federal | | | 6 Well Number 29-1 |
| 7 OGRID No. | | 8 Operator Name RICHARDSON OPERATING Co. | | | 9 Elevation 5554' |

10 Surface Location

| UL or lot no. | Section | Township | Range | Lot Ida | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|----------|
| B | 29 | 30 N. | 14 W | | 790 | North | 1410 | East | San Juan |

11 Bottom Hole Location If Different From Surface

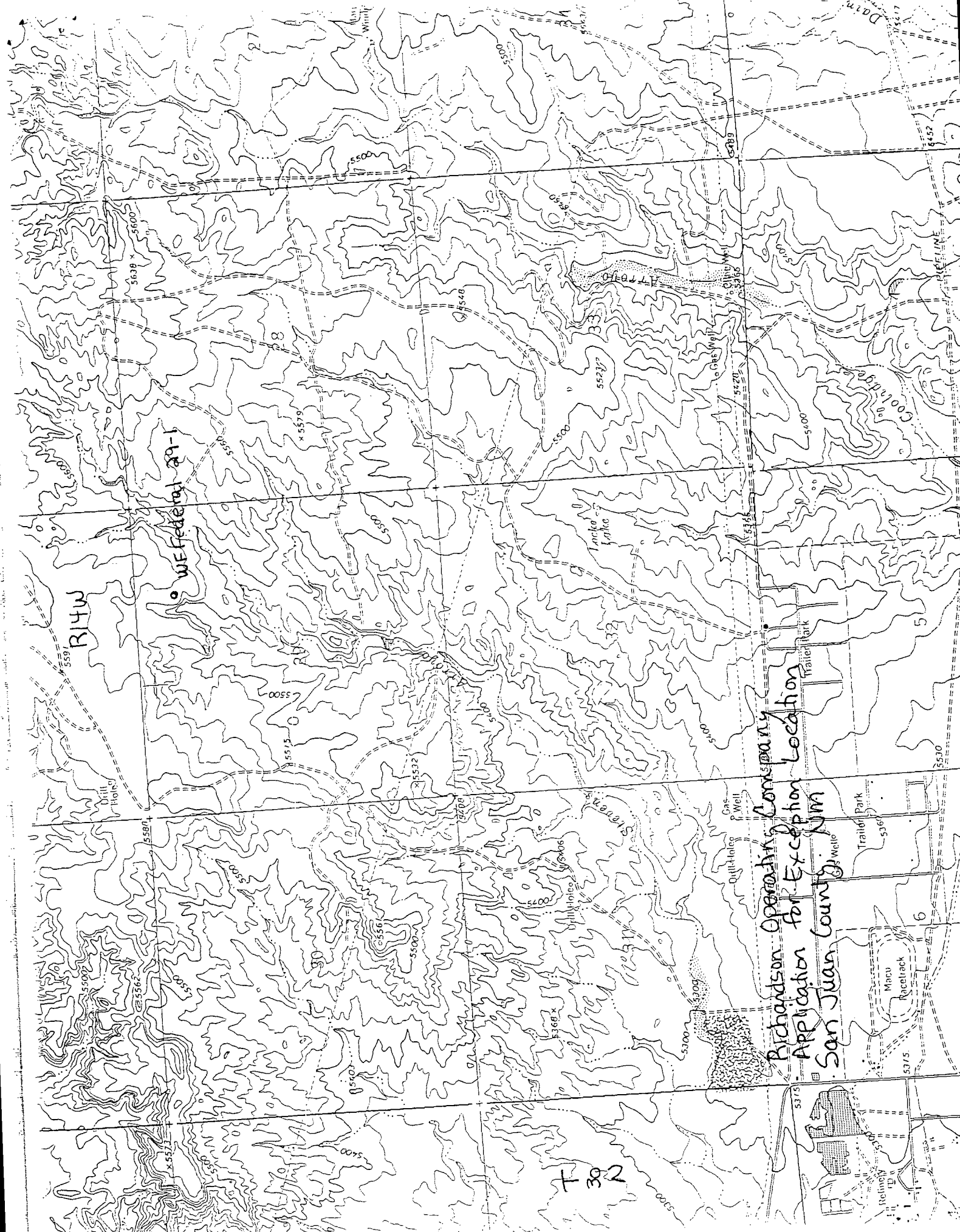
| UL or lot no. | Section | Township | Range | Lot Ida | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| | | | | | | | | | |

| | | | |
|-------------------------------|--------------------|---|--------------|
| 12 Dedicated Acres 160/320 | 13 Joint or Infill | 14 Consolidation Code To be communitized | 15 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

| | | | | | |
|---|--|--|--|---|--|
| 16 See attached for Royalty, ORRI and WI Owners | | | | 17 OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Signature <u>Lisa L. Smith</u> Printed Name Authorized Agent for: Title <u>Richardson Operating Company</u> Date <u>November 16, 1998</u> | |
| 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 <u>20 October '98</u> Signature <u>[Signature]</u> Seal of Professional Surveyor Certificate Number <u>6844</u> | | | | | |

| | | | | |
|--|---|---|--|--|
| <div data-bbox="82 1753 165 1816">2</div> <div data-bbox="115 1764 165 1816">☼</div> <div data-bbox="437 2005 561 2068"> <div data-bbox="437 2005 512 2068">2</div> <div data-bbox="470 2026 512 2068">☼</div> <div data-bbox="512 2026 561 2068">Kgl Kd</div> </div> <div data-bbox="140 1144 338 1323"> <div data-bbox="140 1186 231 1239">1</div> <div data-bbox="165 1186 231 1239">☼</div> <div data-bbox="198 1186 239 1323">Kd Ø D.A.'58</div> <div data-bbox="239 1155 338 1291"> <div data-bbox="239 1155 272 1186">6</div> <div data-bbox="272 1155 313 1207">☼</div> <div data-bbox="297 1144 338 1291">Kpc Ø D.A.'54</div> </div> </div> | <div data-bbox="74 850 123 955">R14W</div> <div data-bbox="198 735 305 871"> <div data-bbox="198 735 239 798">1-20</div> <div data-bbox="239 766 272 819">☼</div> <div data-bbox="264 735 305 871">Kgl Ø D.A.'63</div> </div> <div data-bbox="462 966 561 1102"> <div data-bbox="462 1029 512 1081">1</div> <div data-bbox="512 1029 553 1081">☼</div> <div data-bbox="528 966 561 1102">Kgl Ø D.A.'62</div> </div> | <div data-bbox="586 598 718 808"> <div data-bbox="586 724 627 777">1</div> <div data-bbox="627 724 677 777">☼</div> <div data-bbox="636 598 718 808">Kd P.A.'93</div> </div> <div data-bbox="586 598 677 703"> <div data-bbox="586 598 627 651">1</div> <div data-bbox="627 598 677 651">☼</div> <div data-bbox="636 598 677 703">Kd P.A.'82</div> </div> <div data-bbox="636 451 677 598"> <div data-bbox="636 451 677 504">1</div> <div data-bbox="677 451 718 504">☼</div> <div data-bbox="685 451 726 598">Kmv - NP.'77</div> </div> <div data-bbox="685 451 726 598"> <div data-bbox="685 451 726 504">1</div> <div data-bbox="726 451 768 504">☼</div> <div data-bbox="735 451 776 598">PE Ø D.A.'77</div> </div> <div data-bbox="801 1648 850 1806"> <div data-bbox="801 1680 842 1732">1</div> <div data-bbox="842 1680 883 1732">☼</div> <div data-bbox="875 1648 916 1806">Kpc Ø D.A.'56</div> </div> <div data-bbox="834 1858 949 1911"> <div data-bbox="834 1858 875 1911">1</div> <div data-bbox="875 1858 916 1911">☼</div> <div data-bbox="925 1858 966 1911">150' (43)</div> </div> <div data-bbox="859 1407 999 1564"> <div data-bbox="859 1491 900 1543">2</div> <div data-bbox="900 1491 941 1543">☼</div> <div data-bbox="941 1407 999 1564">Kgl } P.A.'95 Kd }</div> </div> <div data-bbox="941 1669 1082 1774"> <div data-bbox="941 1680 982 1732">1</div> <div data-bbox="982 1680 1024 1732">☼</div> <div data-bbox="1024 1669 1082 1774">Kgl Kd Ø D.A.'86</div> </div> | <div data-bbox="801 850 842 903">29</div> <div data-bbox="834 325 949 472"> <div data-bbox="834 357 875 409">1-28</div> <div data-bbox="875 388 916 441">☼</div> <div data-bbox="908 325 949 472">Kpc Ø D.A.'54</div> </div> <div data-bbox="1189 808 1305 1018"> <div data-bbox="1189 913 1230 966">2</div> <div data-bbox="1230 913 1272 966">☼</div> <div data-bbox="1255 808 1305 1018">T.A. 1000' Kpc Ø D.A.'54</div> </div> <div data-bbox="1189 661 1288 714"> <div data-bbox="1189 703 1230 756">1-32</div> <div data-bbox="1230 724 1272 777">☼</div> </div> <div data-bbox="1205 220 1313 336"> <div data-bbox="1205 231 1247 283">1</div> <div data-bbox="1247 231 1288 283">☼</div> <div data-bbox="1272 220 1313 336">Kd P.A.'85</div> </div> <div data-bbox="1379 651 1503 756"> <div data-bbox="1379 682 1420 735">45</div> <div data-bbox="1420 682 1462 735">☼</div> <div data-bbox="1462 651 1503 756">Kf pda Kpc</div> </div> | <div data-bbox="1329 1848 1371 1900">36</div> <div data-bbox="1329 1354 1371 1407">31</div> <div data-bbox="1131 1197 1329 1344"> <div data-bbox="1131 1501 1172 1554">1</div> <div data-bbox="1172 1501 1214 1554">☼</div> <div data-bbox="1214 1197 1329 1344">Kgl } P.A.'95 Kd }</div> </div> <div data-bbox="1222 1249 1329 1344"> <div data-bbox="1222 1270 1263 1323">2</div> <div data-bbox="1263 1270 1305 1323">☼</div> <div data-bbox="1296 1197 1329 1344">Kpc Ø T.A.'54</div> </div> <div data-bbox="1478 1386 1594 1617"> <div data-bbox="1478 1417 1519 1470">2</div> <div data-bbox="1519 1417 1561 1470">☼</div> <div data-bbox="1561 1386 1594 1617">Kpc Ø D.A.'69</div> </div> <div data-bbox="1486 1144 1577 1260"> <div data-bbox="1486 1165 1528 1218">1</div> <div data-bbox="1528 1165 1569 1218">☼</div> <div data-bbox="1569 1144 1610 1260">6</div> </div> <div data-bbox="1511 241 1618 472"> <div data-bbox="1511 409 1552 462">2</div> <div data-bbox="1552 409 1594 462">☼</div> <div data-bbox="1594 388 1618 472">P.A.'93</div> </div> <div data-bbox="1387 1417 1594 2068"> <div data-bbox="1387 1554 1445 2068">Richardson Operating Company</div> <div data-bbox="1445 1617 1503 2068">Application for Exception</div> <div data-bbox="1503 1774 1544 2068">WF Federal 28-1</div> <div data-bbox="1544 1638 1594 2068">San Juan County, NM</div> <div data-bbox="1445 1417 1503 1617">Location</div> </div> |
|--|---|---|--|--|



Richardson Operating Company
Application for Exception Location
San Juan County, NM

T 30 2

COUNTY San Juan

POOL

Twin Mounds - Pictured Cliffs

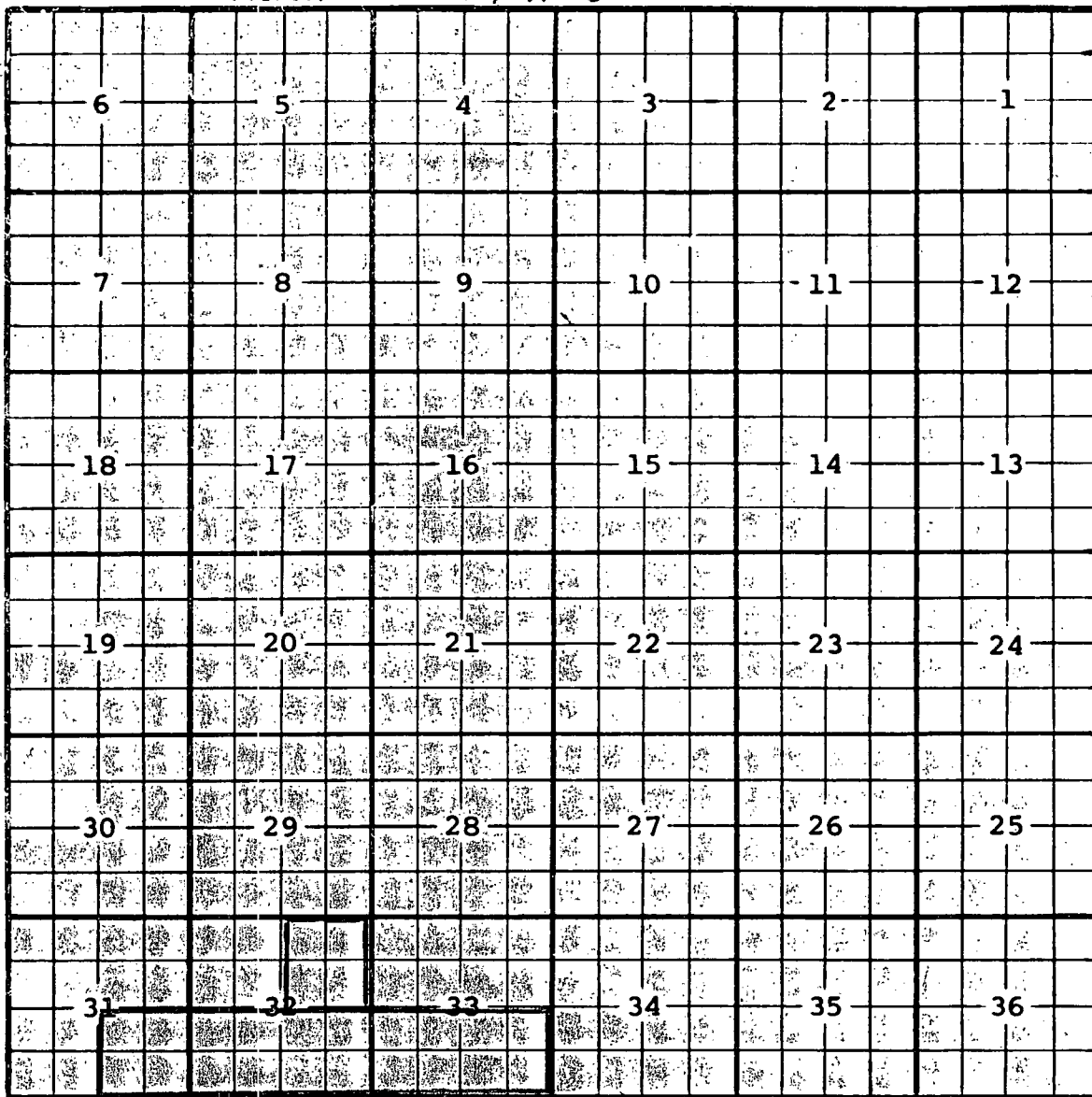
Fruitland SAND

TOWNSHIP 30 North

RANGE

14 West

NMPM



Description: $\frac{SE}{4}$ Sec. 31; $\frac{S}{2}$ Sec. 32; $\frac{S}{2}$ Sec. 33 (R-4311, 6-1-72)

Extend vertical limits to include Fruitland formation and redesignate as Twin Mounds Fruitland-Pictured Cliffs Pool (R-7495, 4-5-84)

Ext: $\frac{NE}{4}$ Sec. 32 (R-8417, 3-24-87) REDESIGNATED (R-8769, 10/17/88)