



SUSPENSE 1/15/02	ENGINEER MS	LOGGED IN RN	TYPE NSL	APP NO. 136545477
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NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505

ABOVE THIS LINE FOR DIVISION USE ONLY

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

DEC 26 2001

- [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.

Print or Type Name	Signature	Title	Date
BRIAN WOOD (505) 466-8120 FAX 466-9682		CONSULTANT	12-22-01
			e-mail Address brian@permitswest.com

REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION
FOR RICHARDSON OPERATING CO.
RPC 17 #4 GAS WELL
562' FSL & 1392' FEL SEC. 17, T. 29 N., R. 13 W., SAN JUAN COUNTY, NM

I. The well is on private surface and on a private oil and gas lease. The proposed location is non-standard for the West Kutz Pictured Cliffs due to topography and surface uses. The well must be at least 660' from all quarter section lines. This well is 562' from the south line of the southeast quarter of Section 17. Thus, it is 98' too far south. Richardson controls the Pictured Cliff rights to the south and has already staked a standard location in the northeast quarter of Section 20. Richardson operates a standard Pictured Cliffs well (Eaton White #1) in the northwest quarter of Section 20. The APD (Exhibit A) is attached.

II. A C-102 (Exhibit B) showing the well location and proration unit (hatched line marking the southeast quarter = 160 acres) for the Pictured Cliffs is attached. Richardson's leasehold (= solid line) is shown on the attached copy (Exhibit C) of the Farmington South USGS topo map. The well is 2,423' from the closest non-Richardson operated lease. A standard location would be closer to the exterior of the lease.

III. According to NM Oil Conservation Records reviewed in their Santa Fe office on December 12, 2001 and on line on December 21, 2001; there is no production from the Pictured Cliffs within a minimum 2,863' radius. Closest such well is Richardson's White #1 at 1450' FNL & 1850' FWL 20-29n-13w. A copy of the Farmington South 7.5' USGS map (Exhibit D) is attached showing the proposed well site, existing producing wells (3 Dakota and 3 PC {all Richardson}), and 21 plugged and abandoned wells. Richardson is the operator of its fee lease and leases within a minimum 2,423'. Registered letters were sent on December 22, 2001 to the offset interest owners. A copy of the receipts and letters will be provided.

IV. A copy of the Farmington South USGS map is attached (Exhibit E). The proposed well site is marked. Pictured Cliffs' proration unit (solid line) is all of the southeast quarter of Section 17, which is 160.00 acres in size. A

dashed line marks the standard drilling window.

V. Topography is one reason forcing a non-standard location. The center of the drilling window is bisected by the San Juan River and its floodplain (see Exhibit E).

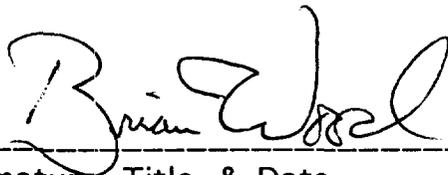
VI. Archaeology is not an issue.

VII. The non-standard location is requested because of surface conditions. One-fourth of the drilling window (see dashed line on attached assessor's plat (Exhibit F)) is inside the Farmington City Limits. NM 371 cuts a slice out of the drilling window. Other manmade impediments inside the drilling window include a nursing home, large gas station, trucking company, church, and houses. Surface owners with land in the drilling window were approached about drilling on their land. None accepted. Finally, an owner just south of the window agreed - provided Richardson would buy their acre. Richardson did. In order for Richardson to even be close to the drilling window, Richardson had to stake a smaller than normal pad (see pad plan view on (Exhibit G)).

VIII. Directional drilling is not a feasible for such a shallow well.

IX. I hereby certify that notice has been sent to the following lessees, lessors, operators of spacing units, or owners of undrilled leases which adjoin the applicant's spacing unit on one or more of the two sides or the single closest corner to the proposed well and that the information is current and correct:

Gerald Cochran
First National Bank of Iowa City
Elizabeth Fisk
William Hall
(Mrs.) Howard Henderson
Navajo Bible Missionary Church
New Mexico State Highway Dept.
Jeanette Satterly
Arnette Small



Consultant

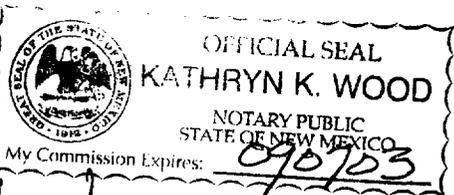
12-22-01

Signature, Title, & Date

STATE OF NEW MEXICO)
) SS:
COUNTY OF SANTA FE)

The foregoing instrument was acknowledged before me this 22nd day of December, 2001 by Brian Wood. Witness my hand and official seal.

Kathryn K. Wood
Notary Public
My Commission Expires: 09/09/03
Business Address: 37 VERANO LOOP, SANTA FE, NM 87508



cc: Aztec OCD, Van Blaricom

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, 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-101
Revised March 17, 1999

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit to appropriate District Office
State Lease - 6 Copies
Fee Lease - 5 Copies

AMENDED REPORT

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

¹ Operator Name and Address Richardson Operating Company (303) 830-8000 1700 Lincoln St., Suite 1700, Denver, Co. 80203		² OGRID Number 19219
		³ API Number 30-
⁴ Property Code RPC 17	⁵ Property Name	⁶ Well No. 4

⁷ Surface Location

UL or lot no.	Section	Township	Range	Lot ldn	Feet from the	North/South line	Feet from the	East/West line	County
0	17	29n	13w		562	South	1392	East	SJ

⁸ Proposed Bottom Hole Location If Different From Surface

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

⁹ Proposed Pool 1 West Kutz Picture Cliffs	¹⁰ Proposed Pool 2
--	-------------------------------

¹¹ Work Type Code N	¹² Well Type Code G	¹³ Cable/Rotary R	¹⁴ Lease Type Code P	¹⁵ Ground Level Elevation 5264'
¹⁶ Multiple Yes	¹⁷ Proposed Depth 1,150'	¹⁸ Formation Lewis	¹⁹ Contractor .	²⁰ Spud Date 1-5-02

²¹ Proposed Casing and Cement Program

Hole Size	Casing Size	Casing weight/foot	Setting Depth	Sacks of Cement	Estimated TOC
8-3/4"	7"	20	120'	60 sx	Surface
6-1/4"	4-1/2"	10.5	1,150'	155 sx	Surface

²² Describe the proposed program. If this application is to DEEPEN or PLUG BACK, give the data on the present productive zone and proposed new productive zone. Describe the blowout prevention program, if any. Use additional sheets if necessary.

Will use 2000# BOP and run logs and DST as appropriate.

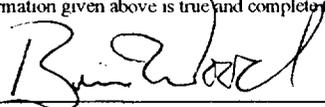
²³ I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature: 	OIL CONSERVATION DIVISION	
	Approved by:	
Printed name: Brian Wood	Title:	
Title: Consultant	Approval Date:	Expiration Date:
Date: December 21, 2001	Phone: (505) 466-8120	Conditions of Approval: Attached <input type="checkbox"/>

EXHIBIT A

State of New Mexico
 Energy, Minerals & Mining Resources Department
 OIL CONSERVATION DIVISION
 2040 South Pacheco
 Santa Fe, NM 87505

Form C - 102

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

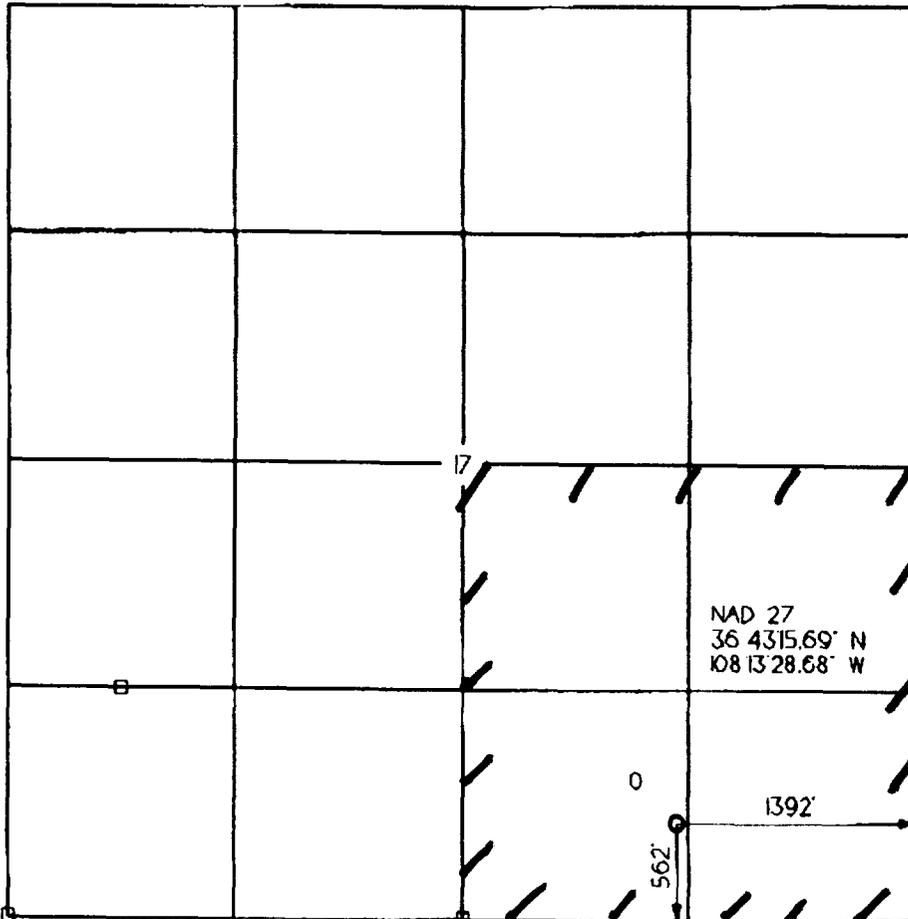
APA Number	Pool Code	Pool Name
	79680	WEST KUTZ PICTURE CLIFFS
Property Code	Property Name	Well Number
	RPC 17	4
OGRD No.	Operator Name	Elevation
019219	RICHARDSON OPERATING COMPANY	5264

Surface Location									
UL or Lot	Sec.	Twp.	Rge.	Lot Id.	Feet From	North/South	Feet From	East/West	County
0	17	29 N.	13 W.		562'	SOUTH	1392'	EAST	SAN JUAN

Bottom Hole Location if Different From Surface									
UL or Lot	Sec.	Twp.	Rge.	Lot Id.	Feet From	North/South	Feet From	East/West	County

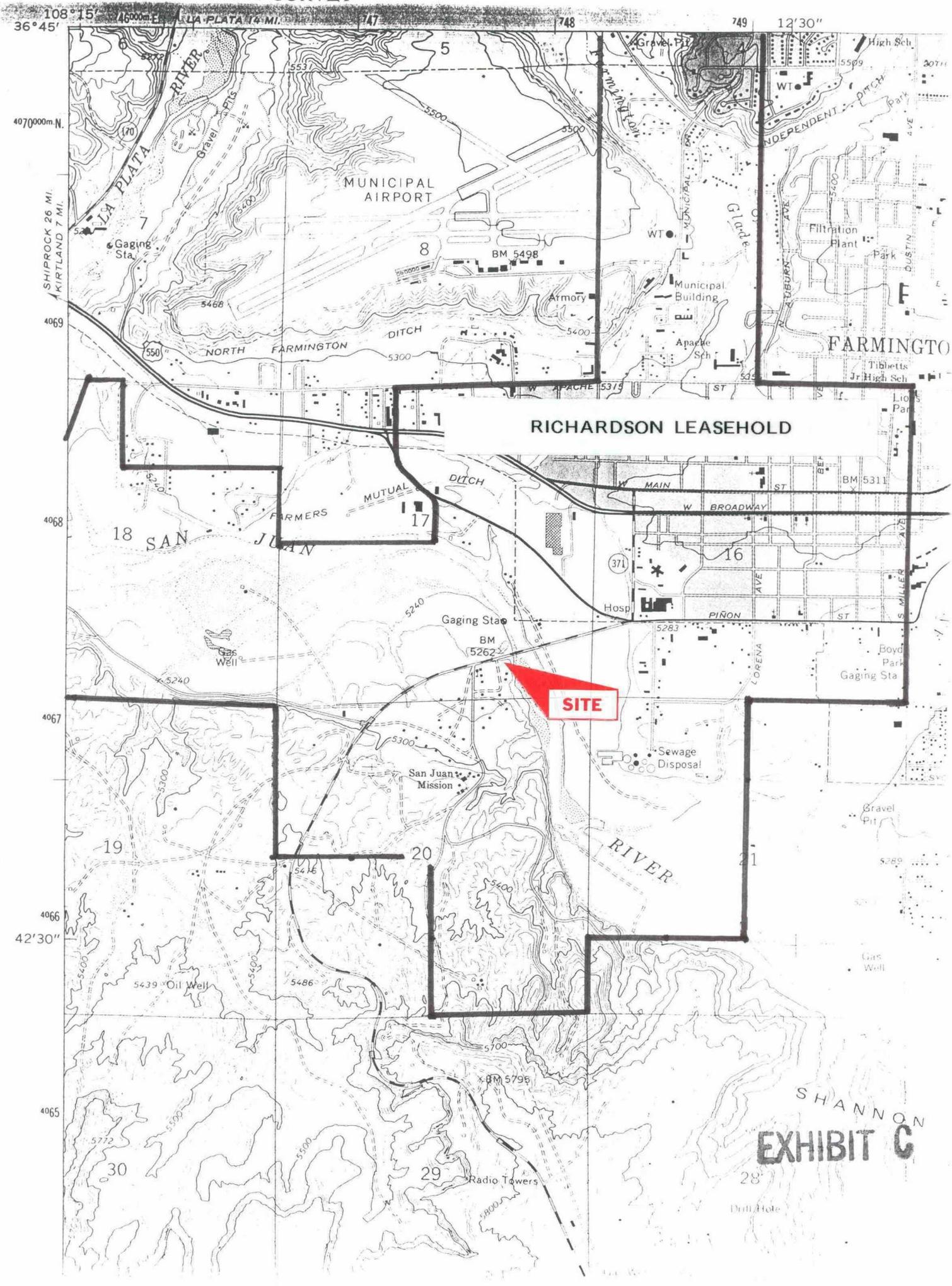
Dedication	Joint ?	Consolidation	Order No.

NO ALLOWABLE WELL 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.	
Signature	<i>Brian Wood</i>
Printed Name	BRIAN WOOD
Title	CONSULTANT
Date	DEC. 21, 2001
SURVEYOR CERTIFICATION	
I hereby certify that the well location 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	DECEMBER 2001
Signature	<i>[Signature]</i>
Professional Seal	

EXHIBIT B



108° 15' 46000m E LA PLATA 14 MI. 747 748 749 12' 30"

36° 45'

4070000m N.

SHIPROCK 26 MI. KIRTLAND 7 MI.

4069

LA PLATA RIVER

MUNICIPAL AIRPORT

Gravel Pits

5500

5500

Gravel Pit

High Sch.

5599

30711

INDEPENDENT DITCH

GLORIA

FARMINGTON

5468

5400

5400

Armory

Municipal Building

Apache Sch.

FARMINGTO

Tibbets Jr High Sch.

LIOS

W APACHE 5319 ST

7

17

18 SAN JUAN

FARMERS

MUTUAL DITCH

W MAIN ST

W BROADWAY ST

BM 5311

16

371

Hosp

5283

LORENA

Boyd Park

Gaging Sta

4068

4067

4066

42' 30"

4065

5240

5240

5300

San Juan Mission

Sewage Disposal

Gravel Pit

5289

52

5439 Oil Well

5486

5400

5400

5700

5795

Radio Towers

5000

5772

30

29

28

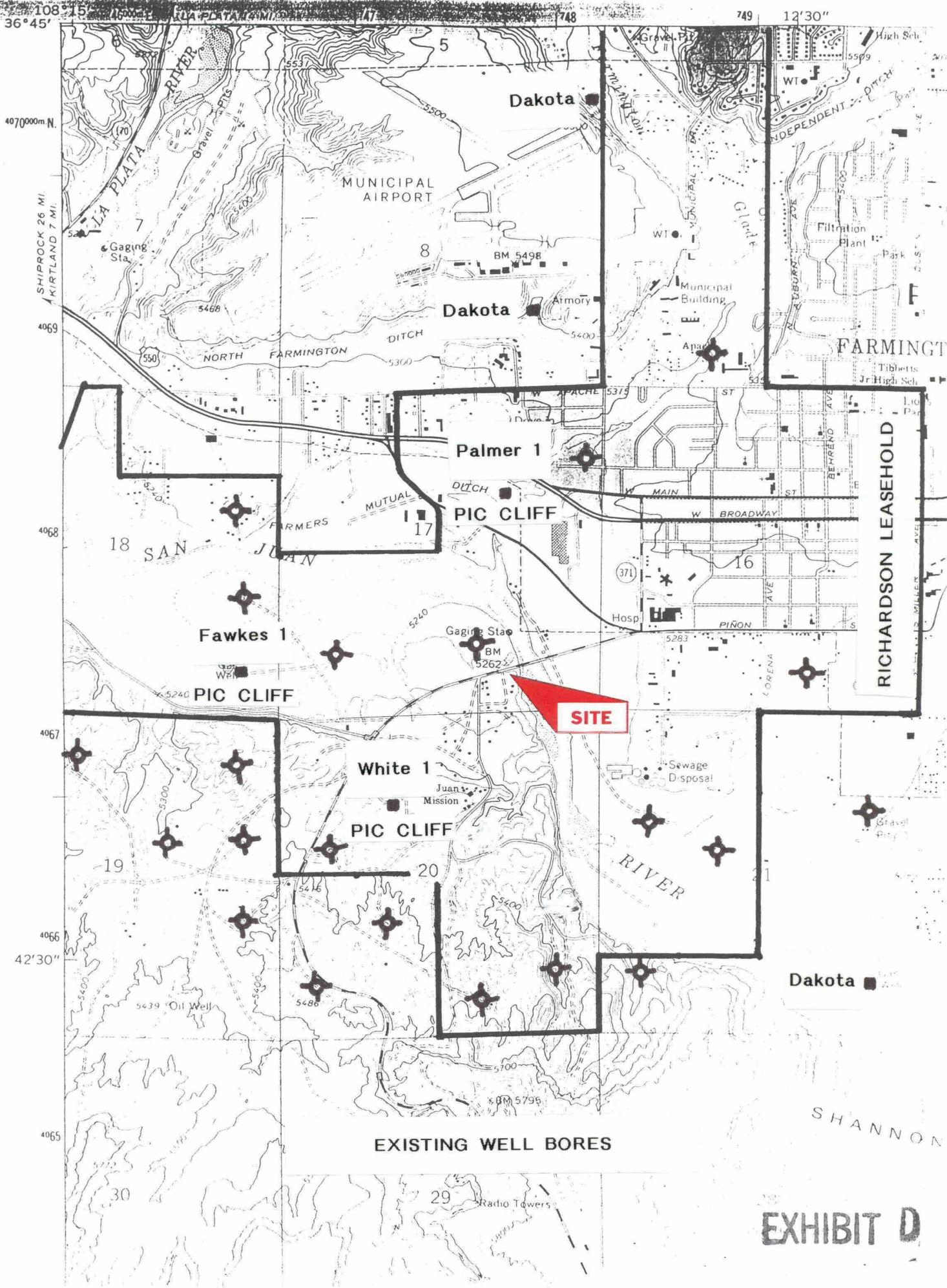
SHANNON EXHIBIT C

Drill Hole

RICHARDSON LEASEHOLD

SITE

SHANNON EXHIBIT C



EXISTING WELL BORES

EXHIBIT D

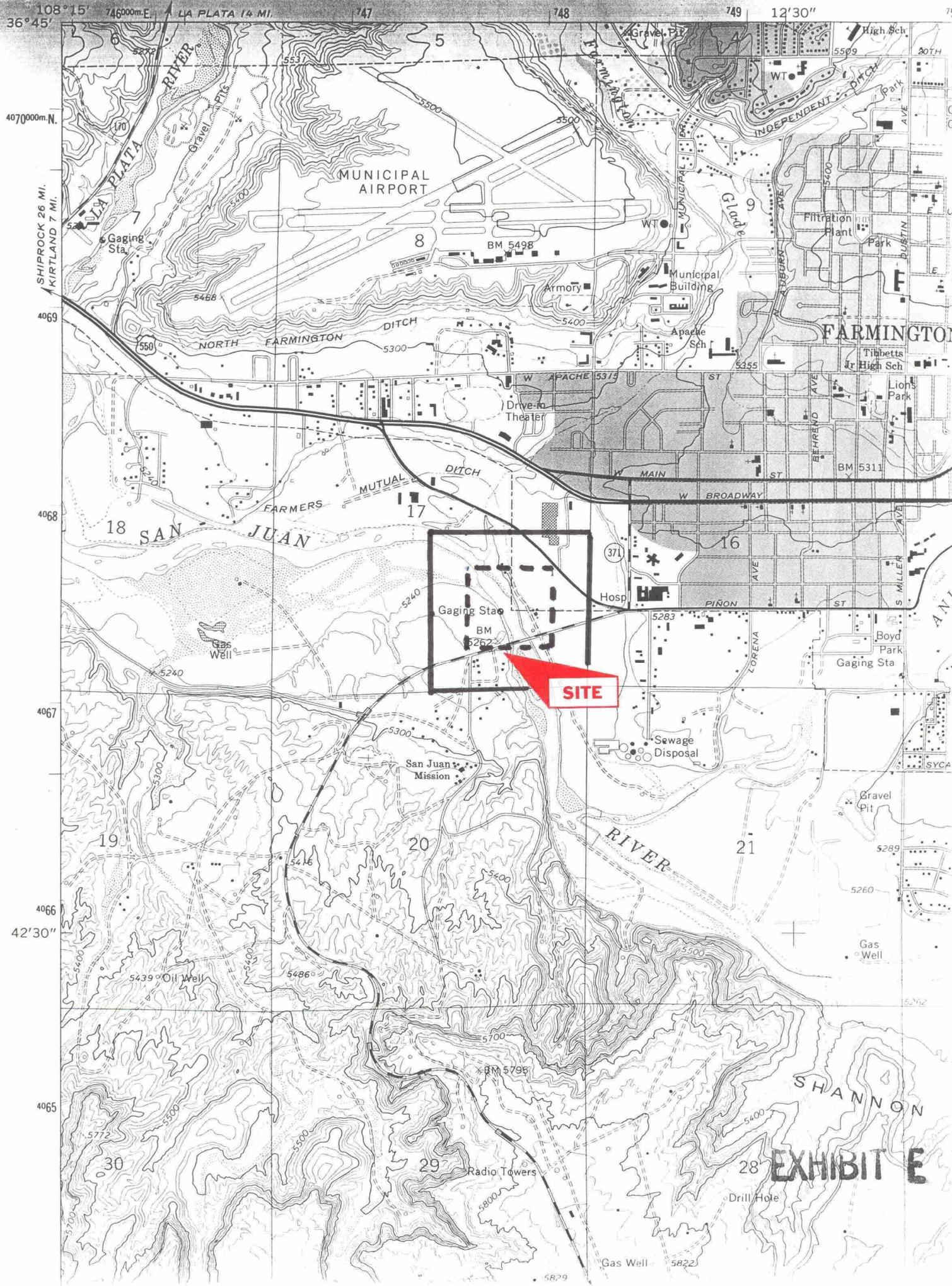
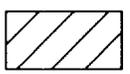


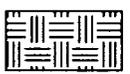
EXHIBIT E



0' 40'
Scale 1" = 40'

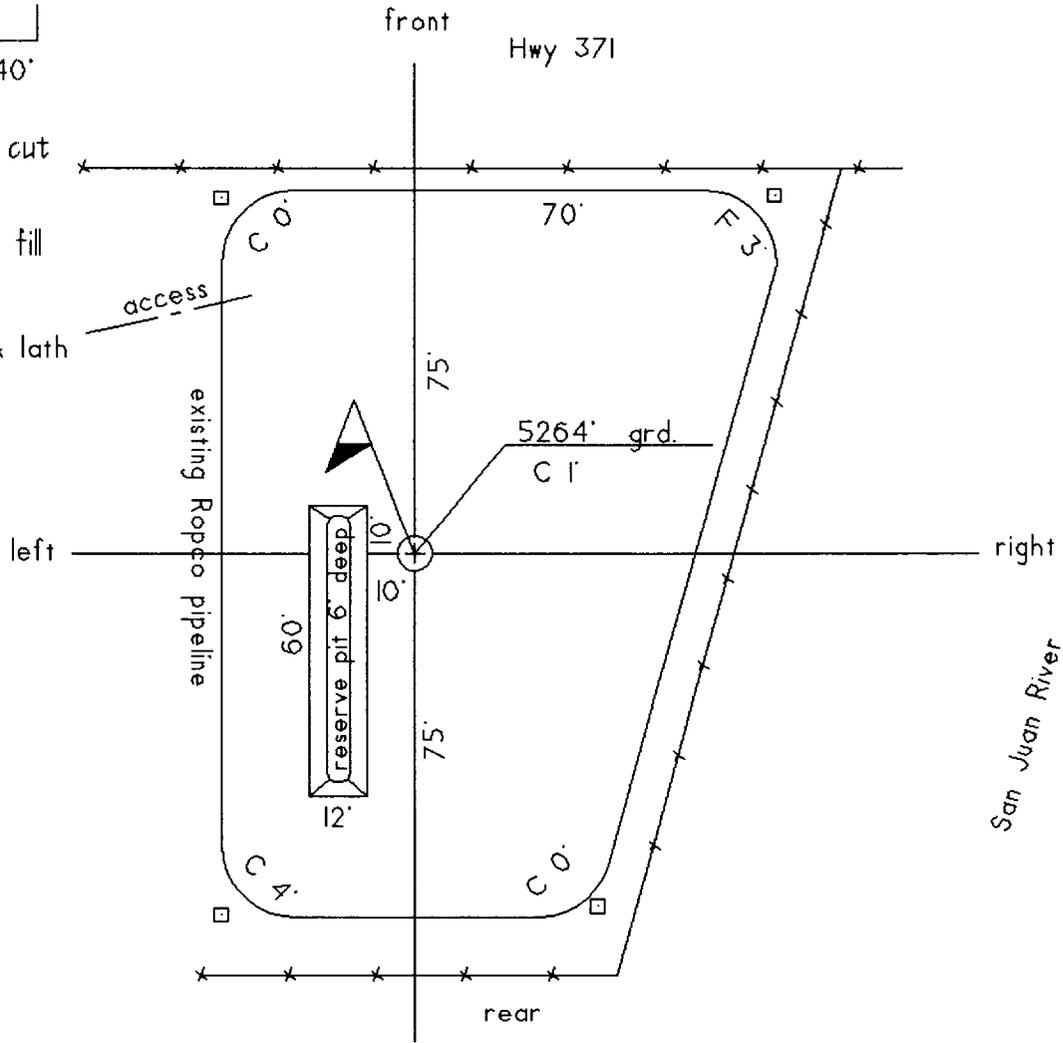


cut



fill

□ set stake & lath



PERMITS WEST, INC.

PROVIDING PERMITS for the ENERGY INDUSTRY

37 Verano Loop, Santa Fe, New Mexico 87505

(505) 984-8120

466

December 21, 2001

Gerald Cochran
1509 Schofield Ln.
Farmington, NM 87401

As required by New Mexico Oil Conservation Division Rules, I am notifying you of the following non-standard location for a well. This letter is a notice only. No action is needed unless you have questions or objections.

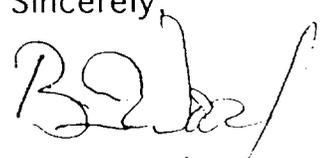
Richardson Operating Co. is applying to drill its RPC 17 #4 gas well. The minimum distance from a Pictured Cliffs gas well to a quarter section line is 660'. Due to surface conditions, the well is 562' from the south line of the section, or 98' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 2,863' from the closest Pictured Cliffs producer (Richardson's White #1 well). See attached map for more details.

Well Name: RPC 17 #4 Total Depth: 1,150'
Proposed Producing Zone: Pictured Cliffs sandstone
Acreage Dedication: 160.00 acres (southeast quarter of Section 17)
Location: 562' FSL & 1392' FEL Sec. 17, T. 29 N., R. 13 W.,
San Juan County, NM on a private lease
Approximate Location: ≈1/4 air mile southwest of Farmington, NM
Applicant Name: Richardson Operating Co. (303) 830-8000
Applicant's Address: 1700 Lincoln St., Suite 1700, Denver, Co. 80203

Submittal Information: Application for a non-standard location will be filed with the NM Oil Conservation Division. If they determine the application complies with the applicable regulations, then it will be approved. The New Mexico Oil Conservation Division address is 2040 S. Pacheco, Santa Fe, NM 87504. Their phone number is (505) 827-7131.

questions.

Sincerely,



Brian Wood

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsed if required)	
Restricted Mail Fee (Endorsed if required)	
Total Postage & Fees	\$

Postmark
Here

Sent to: *Gerald Cochran*
Street, Apt. #: *1509 Schofield Ln*
City, State, ZIP: *Farmington, NM 87401*

0000 1670 0000 5356 8513

PERMITS WEST, INC.

PROVIDING PERMITS for the ENERGY INDUSTRY

37 Verano Loop, Santa Fe, New Mexico 87505

(505) 884-8120

466

December 21, 2001

Elizabeth Fisk, Trustee
P. O. Box 310
Farmington, NM 87499

As required by New Mexico Oil Conservation Division Rules, I am notifying you of the following non-standard location for a well. This letter is a notice only. No action is needed unless you have questions or objections.

Richardson Operating Co. is applying to drill its RPC 17 #4 gas well. The minimum distance from a Pictured Cliffs gas well to a quarter section line is 660'. Due to surface conditions, the well is 562' from the south line of the section, or 98' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 2,863' from the closest Pictured Cliffs producer (Richardson's White #1 well). See attached map for more details.

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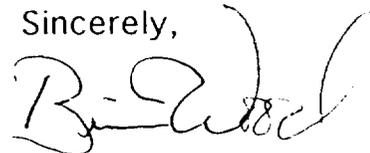
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U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

any questions.

Sincerely,



Brian Wood

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Sent To: Elizabeth Fisk PO Box 310 Farmington NM 87499		

Stogner, Michael

From: Hayden, Steven
Sent: Wednesday, December 26, 2001 7:34 AM
To: Stogner, Michael
Subject: RPC 17 #4

Mike,
I just received an app. for NSL on the RPC 17 #4 in O, 17, 29N, 13W. This seems to be OK based on topo as the San Juan River pretty much cuts out the window north of the location.



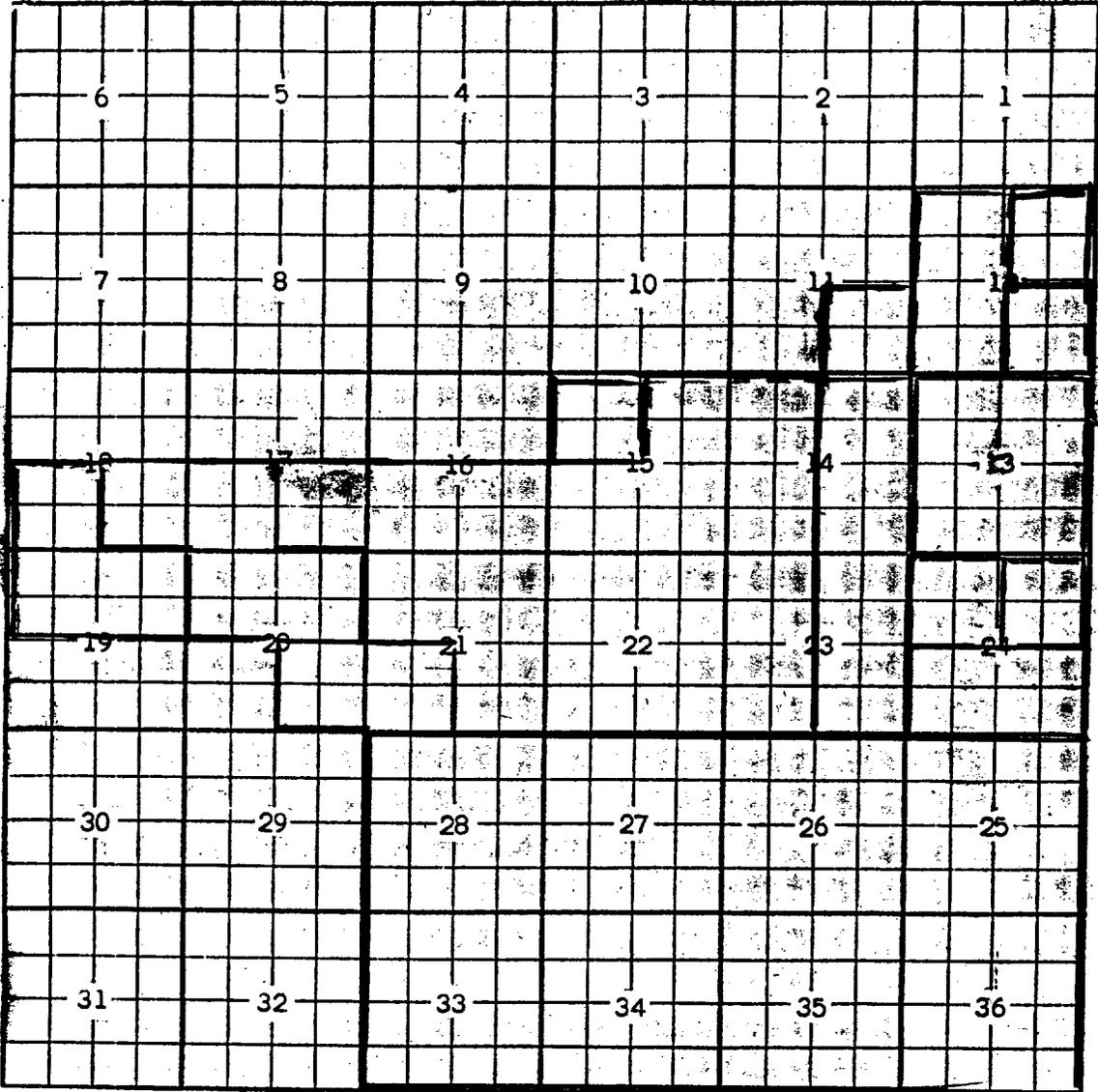
Steve Hayden
NM OCD District III
1000 Rio Brazos Rd.
Aztec, NM 87410

shayden@state.nm.us
(505) 334-6178 Ext. 14
Fax: (505) 334-6170

79680

County San Juan Pool West Kutz - Pictured Cliffs

TOWNSHIP 29 North RANGE 13 West NEW MEXICO PRINCIPAL MERIDIAN



Description: All Sec. 25 thru 28; All Sec. 33 thru 36 (R-566, 12-73-54)
Ext: $\frac{SE}{4}$ Sec. 20; $\frac{SW}{4}$ Sec. 21 (R-1284, 12-1-58) - $\frac{SW}{4}$ Sec. 17;
 $\frac{SE}{4}$ Sec. 18; $\frac{N}{2}$ Sec. 20 (R-1798, 11-1-60) Ext: $\frac{S}{2}$ Sec. 24 (R-6327, 5-1-80)
Ext: $\frac{SW}{4}$ sec 18 $\frac{N}{2}$ sec 19 (R-6886, 1-22-82)
Ext: $\frac{NE}{4}$ Sec. 24 (R-7495, 4-5-84) Ext: $\frac{NW}{4}$ Sec. 24 (R-8180, 3-14-86)
Ext: All Sec. 13 (R-9573, 8-23-91) Ext: $\frac{SE}{4}$ Sec. 12 (R-10194, 9-19-94)
Ext: $\frac{NE}{4}$ sec. 12 (R-10957, 5-2-95) Ext: $\frac{W}{2}$ sec. 12, $\frac{E}{2}$ Sec. 14, $\frac{E}{2}$ Sec. 23 (R-10610, 6-18-96)
Ext: $\frac{SE}{4}$ Sec. 11 (R-10676, 10-1-96) Ext: $\frac{W}{2}$ Sec. 14, $\frac{S}{2}$ and $\frac{NE}{4}$ Sec. 15, $\frac{S}{2}$ Sec. 16,
 $\frac{SE}{4}$ Sec. 17, $\frac{N}{2}$ and $\frac{SE}{4}$ Sec. 21, All Sec. 22, $\frac{W}{2}$ Sec. 23 (R-10907, 10-17-97)
Ext: $\frac{NW}{4}$ Sec. 15 (R-11173, 5-5-99)

CMD :
OG5SECT

ONGARD
INQUIRE LAND BY SECTION

01/02/02 16:05:
OGOMES -TQ
PAGE NO:

Sec : 17 Twp : 29N Rng : 13W Section Type : NORMAL

D 40.00 Fee owned	C 40.00 Fee owned	B 40.00 Fee owned	A 40.00 Fee owned
E 40.00 Fee owned	F 40.00 Fee owned	G 40.00 Fee owned P	H 40.00 Fee owned

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06
PF07 BKWD PF08 FWD PF09 PRINT PF10 SDIV PF11 PF12

CMD :
OG5SECT

ONGARD
INQUIRE LAND BY SECTION

01/02/02 16:05:
OGOMES -TQ
PAGE NO:

Sec : 17 Twp : 29N Rng : 13W Section Type : NORMAL

L 40.00 Fee owned	K 40.00 Fee owned	J 40.00 Fee owned	I 40.00 Fee owned
M 40.00 Fee owned	N 40.00 Fee owned	O 40.00 Fee owned	P 40.00 Fee owned
A		A	

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06
PF07 BKWD PF08 FWD PF09 PRINT PF10 SDIV PF11 PF12

CMD : ONGARD 01/02/02 16:05:
OG6C101 C101-APPLICATION FOR PERMIT TO DRILL OGOMES -TQ

OGRID Idn : 19219 API Well No: 30 45 30955 APD Status(A/C/P): A
Opr Name, Addr: RICHARDSON OPERATING CO Aprvl/Cncl Date : 12-24-20
1700 LINCOLN ST
#1700
DENVER,CO 80203-4517

Prop Idn: 29104 RPC 17 Well No: 4

	U/L	Sec	Township	Range	Lot	Idn	North/South	East/West
Surface Locn	: O	17	29N	13W			FTG 562 F S	FTG 1392 F E
OCD U/L	: O		API County	: 45				

Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): G Cable/Rotary (C/R) :
Lease typ(F/S/P/N/J/U/I): P Ground Level Elevation : 5264

State Lease No: Multiple Comp (S/M/C) : S
Prpsd Depth : 1150 Prpsd Frmtn : W KUTZ PICTURED CLIFFS

E0009: Enter data to modify record

PF01 HELP PF02 PF03 EXIT PF04 GoTo PF05 PF06 CONFIRM
PF07 PF03 PF09 PRINT PF10 C102 PF11 HISTORY PF12

P KRVO-136545477

***New Mexico Oil Conservation Division---Engineering Bureau
Administrative Application Process Documentation***

Date Application Received: 12-26-2001

Date of Preliminary Review: 1-2-2002
(Note: Must be within 10-days of received date)

Results: Application Complete Application Incomplete

Date Incomplete Letter Sent: NA

Deadline to Submit Requested Information: "

Phone Call Date: "
(Note: Only applies if requested data is not submitted within the 7-day deadline)

Phone Log Completed? Yes No

Date Application Processed: 1-15-02

Date Application Returned: _____
(Note: Only as a last resort & only after repeated attempts by the Division to obtain the necessary information to process the application)