



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
BETTY RIVERA
Cabinet Secretary

September 30, 2002

Lori Wrotenbery
Director
Oil Conservation Division

Richardson Operating Company
c/o Permits West, Inc.
37 Verano Loop
Santa Fe, New Mexico 87505
Attention: **Brian Wood**
brian@permitswest.com

Telefax No. (505) 466-9682

Administrative Order NSL-4784

Dear Mr. Wood:

Reference is made to the following: (i) your application on behalf of the operator, Richardson Operating, Inc. ("Richardson"), that was submitted to the New Mexico Oil Conservation Division ("Division") on September 9, 2002 (*application reference No. pKRV0-225331658*); and (ii) the Division's records in Santa Fe and Aztec: all concerning Richardson's request to drill its proposed NV Navajo "28" Well No. 2 at an unorthodox Pictured Cliffs gas well location 240 feet from the North line and 1940 feet from the West line (Unit C) of Section 28, Township 29 North, Range 14 West, NMPM, San Juan County, New Mexico.

The NW/4 of Section 28 is to be dedicated to this well in order to form a standard 160-acre gas spacing unit for the Undesignated West Kutz-Pictured Cliffs Pool (79680).

This application has been duly filed under the provisions of Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999.

By the authority granted me under the provisions of Division Rule 104.F (2), the above-described unorthodox Pictured Cliffs gas well location is hereby approved.

Sincerely,

Lori Wrotenbery
Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Aztec
U. S. Bureau of Land Management - Farmington