



919102
9/29/02
30

ENGINEER M.S

LOGGED IN MW

TYPE NSL

APP NO. 225331843

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

ABOVE THIS LINE FOR DIVISION USE ONLY

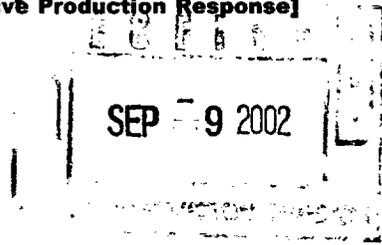
ADMINISTRATIVE APPLICATION CHECKLIST

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 _____



- [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
BRIAN WOOD
(505) 466-8120
FAX 466-9682

Signature

Title
CONSULTANT

Date
9-9-02

e-mail Address
brian@permitswest.com

REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION
FOR RICHARDSON OPERATING CO.
ROPCO 16 #3 GAS WELL
2506' FSL & 1006' FWL SEC. 16, T. 29 N., R. 14 W., SAN JUAN COUNTY, NM

I. The well is on state surface and on state oil and gas lease V-05375. The proposed location is non-standard for the Twin Mounds Pictured Cliffs and Basin Fruitland Coal due to topography (San Juan River floodplain) and land use (irrigated fields). The well must be at least 660' from all quarter section lines. This proposed well is 134' from the north line of the southwest quarter of Section 16. Thus, it is 134' too far north. Richardson controls the Pictured Cliff and Fruitland Coal rights to the north and already has an approved APD for a standard location (Ropco 16 #2) in the northwest quarter of Section 16 (1186' FN & 1392' FW). The Ropco 16 #2 is 1,634' north of the Ropco 16 #3. The APD (Exhibit A) is attached.

II. A C-102 (Exhibit B) showing the well location and pro ration units (solid line marking the southwest quarter = 160 acres) for the Pictured Cliffs and Basin Fruitland Coal (dashed line marking the west half = 320 acres) is attached. Richardson's lease V-05375 (= solid line) is shown on the attached copy (Exhibit C) of the Kirtland USGS topo map. The remainder of the section is Tribal or state leases held by Richardson and which are or will be communitized. The well is 1,006' 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; there is no production from the Pictured Cliffs or Fruitland Coal within a minimum 3,000' radius. Closest such proposed well is Richardson's Ropco 16 #2 at 1186' FNL & 1392' FWL 16-29n-14w, which is 1,634' away. A copy of the Kirtland 7.5' USGS map (Exhibit D) is attached showing the proposed well site, existing producing wells (1 Gallup oil well, 4 Pictured Cliffs and/or Fruitland {all Richardson}), and 10 plugged and abandoned wells within a mile. Richardson is the operator of all leases within a minimum 1,006'. A registered letter was sent on September 9, 2002 to the only affected interest owner (NM State Land Office). A copy of the receipt will be provided.

IV. A copy of the Kirtland USGS map is attached (Exhibit E). The proposed well site is marked. Pictured Cliffs pro ration unit (solid line) is all of the southwest quarter of Section 16, which is 160 acres in size. Fruitland Coal pro ration unit (dashed line) is all of the west half of Section 16, which is 320 acres in size. A dotted line marks the standard drilling window. Existing pro ration units for the Pictured Cliffs and Fruitland are similarly depicted.

V. Topography and land use force a non-standard location. The entire drilling window is covered by the San Juan River, its floodplain, or irrigated fields (see Exhibits E and F). Indeed, despite being so far north, the south edge of the pad still borders a cattail swamp.

VI. Archaeology is not an issue.

VII. The non-standard location is requested because of surface conditions. All of the drilling window (see dotted line on Exhibit E and air photo on Exhibit F) is in the San Juan River, its floodplain, or irrigated fields.

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:

New Mexico State Land Office



Brian Wood, Consultant

September 9, 2002

Date

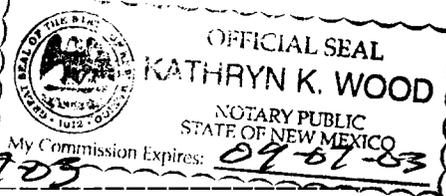
STATE OF NEW MEXICO)
) SS:
COUNTY OF SANTA FE)

The foregoing instrument was acknowledged before me this 9th day of September, 2002 by Brian Wood. Witness my hand and official seal.

Kathryn K. Wood

Notary Public

My Commission Expires: 09-07-03



Business Address: 37 VERANO LOOP, SANTA FE, NM 87508

cc: Aztec OCD, Richardson

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 Property Code Ropco 16		⁴ API Number 30 - 045 - 30994
⁵ Property Name Ropco 16		⁶ Well No. 3

⁷ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
L	16	29n	14w		2506	South	1006	West	SJ

⁸ Proposed 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

⁹ Proposed Pool 1 Twin Mounds Picture Cliffs Ext.	¹⁰ Proposed Pool 2 Basin Fruitland Coal
--	--

¹¹ Work Type Code N	¹² Well Type Code G	¹³ Cable/Rotary R	¹⁴ Lease Type Code S	¹⁵ Ground Level Elevation 5175'
¹⁶ Multiple Yes	¹⁷ Proposed Depth 1,050'	¹⁸ Formation Lewis	¹⁹ Contractor .	²⁰ Spud Date 3-15-02

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	1,050'	145 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: <i>Brian Wood</i>	OIL CONSERVATION DIVISION	
	Approved by:	
Printed name: Brian Wood	Title:	
Title: Consultant	Approval Date:	Expiration Date:
Date: Feb. 9, 2002	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

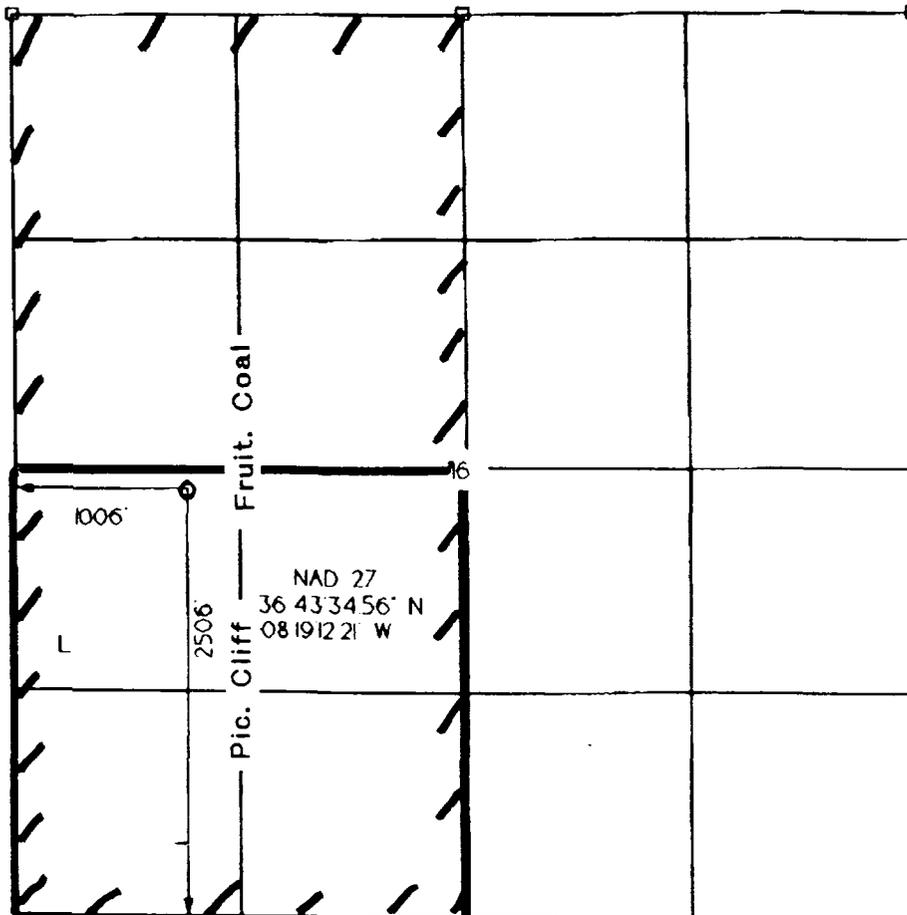
APA Number	Pool Code	Pool Name
	71629 & 86620	FRUIT. COAL & TWIN MOUNDS PIC. CLF.
Property Code	Property Name	Well Number
	ROPCO 16	3
OCRD No.	Operator Name	Elevation
019219	RICHARDSON OPERATING COMPANY	5175'

Surface Location									County
U. or Lot	Sec.	Top.	Rge.	Lot Idn.	Feet From >	North/South	Feet From >	East/West	
L	16	29 N.	14 W.		2506'	SOUTH	1006'	WEST	SAN JUAN

Bottom Hole Location if Different From Surface									County
U. or Lot	Sec.	Top.	Rge.	Lot Idn.	Feet From >	North/South	Feet From >	East/West	

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: *Brian Wood*

Printed Name: BRIAN WOOD

Title: CONSULTANT

Date: FEB. 9, 2002

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:

Signature: *George M. Holston*
 Professional Surveyor

6844

REGISTERED LAND SURVEYOR

EXHIBIT B

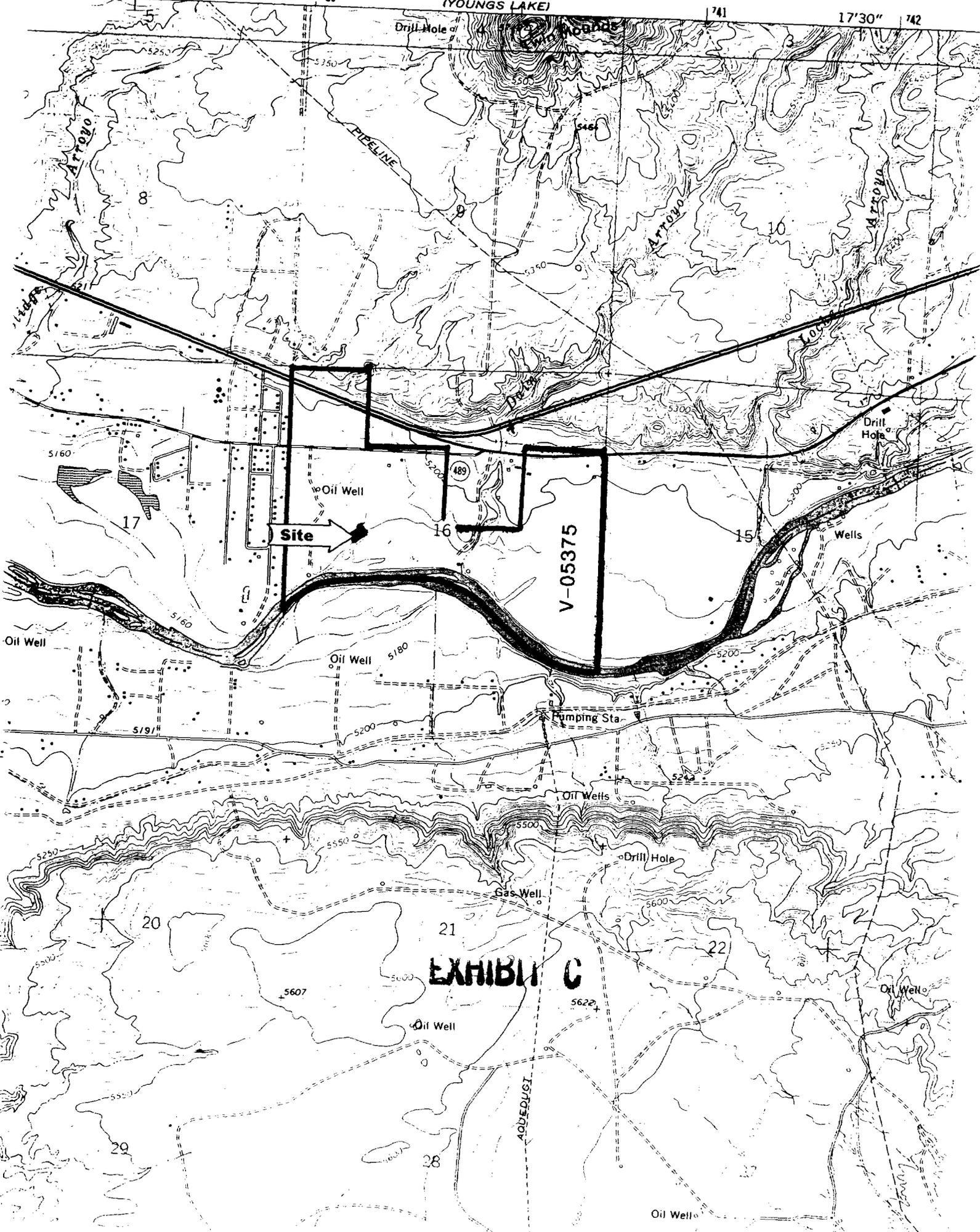
738 20'

739

4357 IV SE
(YOUNGS LAKE)

741

17'30" 742



Site

V-05375

EXHIBIT C

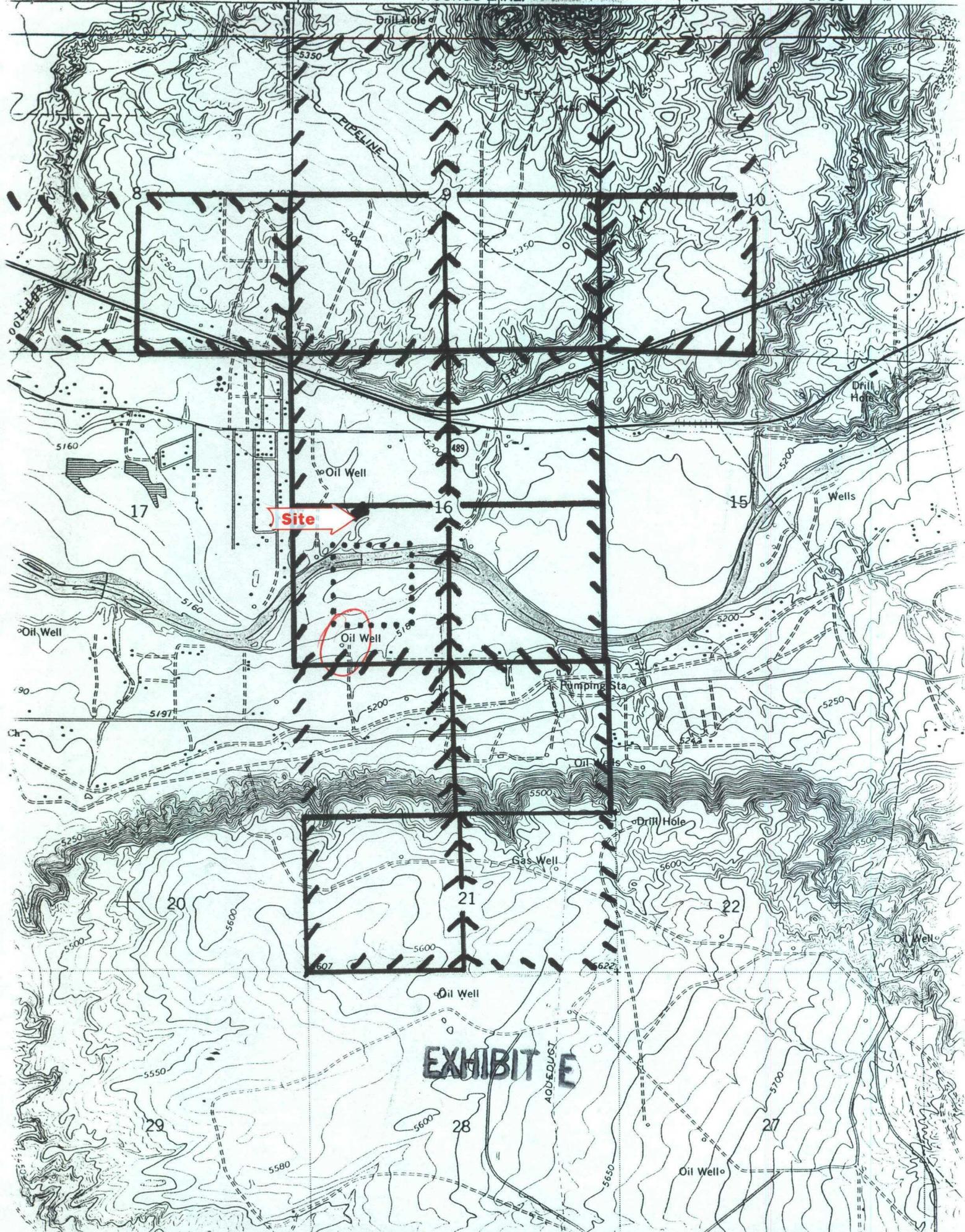


EXHIBIT E

ADDED/UST



15

22

16

EXHIBIT 5

21

Site

17

20

.25MI

Aero Date: 10/13/97

PERMITS WEST, INC.
PROVIDING PERMITS for LAND USERS
37 Verano Loop, Santa Fe, New Mexico 87508 (505) 466-8120

September 9, 2002

Dr. Ray Powell
NM State Land Office
P. O. Box 1148
Santa Fe, NM 87504

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 Ropco 16 #3 gas well. The minimum distance from a gas well to a quarter section line is 660'. Due to surface conditions (San Juan River, floodplain, irrigated fields), the well is 134' from the north line of the quarter section, or 526' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 1,634' from the closest existing or proposed gas well (Richardson's Ropco 16 #2). See attached map for more details.

Well Name: Ropco 16 #3

Total Depth: 1,050'

Proposed Producing Zone: Pictured Cliffs sandstone & Fruitland coal

Acreage Dedication: Pictured Cliffs 160 acres (SW4 of Section 16)
Fruitland coal (W2 Section 16)

Location: 2506' FSL & 1006' FWL Sec. 16, T. 29 N., R. 14 W.,
San Juan County, NM on a state lease V-05375

Approximate Location: ≈1 air mile east of Kirtland, NM

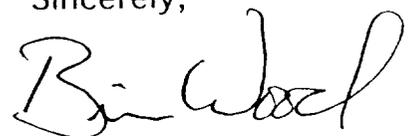
Applicant Name: Richardson Operating Co. (505) 564-3100

Applicant's Address: 3100 LaPlata Highway, Farmington, NM 87401

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.

Please call me if you have any questions.

Sincerely,



Brian Wood



CMD : 09/18/02 13:26:55
 OG5SECT OGOMES -TPSE
 PAGE NO: 1

ONGARD
 INQUIRE LAND BY SECTION

Sec : 16 Twp : 29N Rng : 14W Section Type : NORMAL

D	C	B	A
40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	40.00 CS B11242 0036 EVKO DEVELOPMENT 05/26/54 A	40.00 CS B11242 0049 ENRON OIL & GAS C 05/26/54 A	40.00 CS E03555 0016 CONOCO INC 05/26/60
E 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	F 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	G 40.00 CS E02526 0014 CHASE OIL CORPORA 03/10/59	H 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03

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

Document Name: untitled

CMD : 09/18/02 13:27:05
OG5SECT INQUIRE LAND BY SECTION
ONGARD
OGOMES -TPSE
PAGE NO: 2

Sec : 16 Twp : 29N Rng : 14W Section Type : NORMAL

3 33.83 CS V05375 0001 State part owner 10/01/03	2 25.69 CS V05375 0001 State part owner 10/01/03	5 44.75 CS V05375 0001 State part owner 10/01/03	1 33.89 CS V05375 0001 State part owner 10/01/03	I 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03 A
3 33.83 CS V05375 0001 State part owner 10/01/03	4 32.30 CS V05375 0001 State part owner 10/01/03	5 44.75 Mixed Non State	6 35.40 CS V05375 0001 State part owner 10/01/03	7 28.00 CS V05375 0001 State part owner 10/01/03

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

CMD : ONGARD 09/18/02 13:37:57
OG6C101 C101-APPLICATION FOR PERMIT TO DRILL OGOMES -TPSE

OGRID Idn : 19219 API Well No: 30 45 30993 APD Status(A/C/P) : A
Opr Name, Addr: RICHARDSON OPERATING CO Aprvl/Cncl Date : 02-11-2002
3100 LA PLATA HWY
FARMINGTON,NM 87401

Prop Idn: 29133 ROPCO 16 Well No: 2

U/L Sec Township Range Lot Idn North/South East/West

Surface Locn : C 16 29N 14W FTG 1186 F N FTG 1392 F W
OCD U/L : C 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) : R
Lease typ(F/S/P/N/J/U/I) : S Ground Level Elevation : 5190

State Lease No: Multiple Comp (S/M/C) : S
Prpsd Depth : 1050 Prpsd Frmtn : TWIN MDS PC

E0009: Enter data to modify record
PF01 HELP PF02 PF03 EXIT PF04 GOTO PF05 PF06 CONFIRM
PF07 PF08 PF09 PRINT PF10 C102 PF11 HISTORY PF12

COUNTY San Juan POOL Twin Mounds - Pictured Cliffs ^{Fruitland SANU}

TOWNSHIP 29 North RANGE 14 West NMPM

6	5	4	3	2	1	
7	8	9	10	11	12	
18	17	16	15	14	13	
19	20	21	22	23	24	
30	29	28	27	26	25	
31	32	33	34	35	36	

Ext: All Secs 5 & 8 (R-5470, 7-1-77) N/2 Sec. 6 (R-2277, 5-5-83)
Extend vertical limits to include Fruitland formation and redesignate
as Twin Mounds Fruitland - Pictured Cliffs Pool. Ext: SE/4 Sec. 6 (R-7495, 4-5-84)
REDESIGNATED (R-8769, 10/17/88)