

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
BETTY RIVERA
Cabinet Secretary

June 24, 2002

Lori Wrotenbery
Director
Oil Conservation Division

Williams Production Company c/o Walsh Engineering & Production Corporation 7415 East Main Farmington, New Mexico 87402

Attention:

Paul C. Thompson

Re: Administrative application (application reference No. pKRV0-211656660) to establish a non-standard 303.88-acre gas spacing and proration unit within the Basin-Dakota Pool comprising all of irregular Section 1, Township 31 North, Range 6 West, NMPM, San Juan County, New Mexico, to be dedicated to Williams Production Company's proposed Rosa Unit Well No. 164-B which is to be drilled to a non-standard bottomhole location in Unit "N" of Section 1.

Dear Mr. Thompson:

30-039-27242

The applicable rules governing the Basin-Dakota Pool do not allow this type of non-standard unit to be processed administratively [see Rules II.A and III of the "Special Rules for the Basin-Dakota Pool", as promulgated by Division Order No. R-10987-B (2) and Division Rule 104.D (2) (b) (ii)]. However, in this particular instance and as we discussed, I have caused this application to be placed on the next available examiner's hearing docket scheduled for August 1, 2002 and have it advertised in the following manner:

"Application of Williams Production Company for a non-standard gas proration unit and an unorthodox subsurface gas well location, San Juan County, New Mexico. Applicant seeks to establish a non-standard 303.88-acre gas spacing and proration unit within the Basin-Dakota Pool comprising all of irregular Section 1, Township 31 North, Range 6 West, which is located approximately 5.5 miles south of the New Mexico/Colorado state line at mile corner marker No. 240. This unit is to be dedicated to Williams Production Company's proposed Rosa Unit Well No. 164-B to be directionally drilled from a surface location 1475 feet from the South line and 1235 feet from the East line (Unit J) of irregular Section 1 to an unorthodox bottomhole location within the Basin-Dakota Pool approximately 330 feet from the South line and 1650 feet from the West line (Unit N) of irregular Section 1. IN THE ABSENCE OF OBJECTION, THIS APPLICATION **WILL BE TAKEN UNDER ADVISEMENT.**

Oil Conservation Division * 1220 South St. Francis Drive * Santa Fe, New Mexico 87505 Phone: (505) 476-3440 * Fax (505) 476-3462 * http://www.emnrd.state.nm.us

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I anticipate that an order can be issued at that time without any further information or direct involvement by Williams Production Company.

Should you have any questions or comments concerning this matter, please contact me in Santa Fe at (505) 476-3465. Thank you.

Sincerely

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division - Aztec

U. S. Bureau of Land Management - Farmington

Ms. Florene Davidson, NMOCD - Santa Fe

Kathy Valdes, NMOCD - Santa Fe

William F. Carr, Legal Counsel for Williams Production Company - Santa Fe