Submit 3 Copies To Appropriate District Office	State of New Mexico			Form C-103 Revised March 25, 1999
District I Energy, Minerals and Natural Resources 1625 N. French Dr., Hobbs, NM 88240			WELL API NO.	
District II 1301 W. Grand Ave., Artesia, NM 88210 OIL CONSERVATION DIVISION			30-045-30521	
District III 1220 South St. Francis Dr.			5. Indicate Type of Lease STATE FEE	
1000 Rio Brazos Rd., Aztec, NM 87410 District IV Santa Fe, NM 87505			6. State Oil & Gas Lease No.	
1220 S. St. Francis Dr., Santa Fe, NM 87505				
SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.) 1. Type of Well:				7. Lease Name or Unit Agreement Name: Navajo 34
Oil Well Gas Well Other 2. Name of Operator				7. Well No.
Richardson Operating Company				#1
3. Address of Operator				9. Pool name or Wildcat
3100 La Plata Highway Farmington, NM 87401 505-564-3100 4. Well Location				Bas. Fr. Coal & W. Kutz PC
4. Well Location				
Unit Letter_A	:_780feet from the N	lorth	line and 833_	feet from the Eastline
Section 34	Township 29		Range 14W	NMPM San Juan County
	10. Elevation (Show w 5778' UG	hether Di	R, RKB, RT, GR, et	(2) (1) (2) (2) (3) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4
11. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data				
* * *			SSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK	_		REMEDIAL WOR	
TEMPORARILY ABANDON	CHANGE PLANS		COMMENCE DR	ILLING OPNS. PLUG AND ABANDONMENT
PULL OR ALTER CASING	MULTIPLE COMPLETION		CASING TEST A	
OTHER: Downhole Commingle A		Ø	OTHER:	
12. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.				
				al and West Kutz Pictured Cliffs in this well.
Please see the attached for details on downhole commingling these "pre-approved pools."				
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	C1317AZ			
I hereby certify that the informatio	n above is true and complet	e to the b	est of my knowledg	ge and belief.
SIGNATURE		TITLE_O	perations Manager	DATE_10/03/2003
Type or print name Drew Carnes				Telephone No. (505) 564-3100
(This space for State use)	7/1	Pol	COLLY AN A CAS	OCT 9 con
APPPROVED BY Conditions of approval, if any:	App 1	TITLE	CPUIT WE & GAS I	Telephone No. (505) 564-3100 OCT - 3 2003 DATE Larry Approva (contingent methodology)
Alloc	ation meth	od i	Insutishac	tory. Approva (continger
on soomis	sion of accept	uble	allocation	methodology

Richardson Operating Company

Downhole Commingling Application

The Navajo 34 #1 is a newly drilled Basin Fruitland Coal/West Kutz Pictured Cliffs well. This well is part of Richardson's development program.

Pursuant to Order R-11363, Richardson Operating company seeks approval to downhole commingle the "Pre-approved pools and areas": Basin-Fruitland Coal (71629) and West Kutz Pictured Cliffs (79680) in this well.

The Basin-Fruitland Coal is perforated at 1120'-1126', 1156'-1158', 1210'-1218', and 1220'-1229'. The West Kutz Pictured Cliffs is perforated at 1233'-1243'.

Due to the intermingled nature of the pools and since neither pool has enough data to prepare a reliable production forecast or predict the ultimate reserves, Richardson Operating Company proposes to allocate the production on a 50/50 basis:

<u>Pictured Cliffs Production</u> = 0.50 x Total Production. <u>Fruitland Coal Production</u> = 0.50 x Total Production.

The log in this well shows the Pictured Cliffs is immediately adjacent to the Basin Fruitland Coal. There is no production data from these formations within a 2 mile radius and there is not enough data within 3 miles t make a reasonable assessment between zones. The nature and geometry of the well makes isolating and individually testing the zones impossible.

The downhole commingling will not reduce the value of the total remaining production of this well.

Ownership between the two pools is identical.

A copy of this application has been submitted via Sundry Notice Form 3160-5 to the Bureau of Land Management.