OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

March 22, 2000

Williams Production Company P. O. Box 3102 Tulsa, Oklahoma 74101

Attention:

Lance A. Hobbs

Re:

Administrative application dated March 17, 2000 for an exception to the well location requirements provided within the "Special Rules and Regulations for the Basin-Fruitland Coal (Gas) Pool," as promulgated by Division Order No. R-8768, dated October 17, 1988, as amended by Division Orders No. R-8768-A, dated July 16, 1991, and R-8768-B, issued in Case No. 12296 and dated February 10, 2000, to drill the Rosa Unit Well No. 500 (API No. 30-039-26165) at an off-pattern non-standard coal gas well location 990 feet from the North line and 970 feet from the West line (Unit D) of Section 23, Township 31 North, Range 4 West, NMPM, Rio Arriba County, New Mexico, the W/2 of Section 23 is to be dedicated to trhis well in order to form a standard 320-acre stand-up gas spacing and proration unit for the Basin-Fruitland Coal (Gas) Pool.

Dear Mr. Hobbs:

In reviewing the Division's records of the Rosa Unit Well No. 500, I found that the original Application for Permit to Drill, Deepen, or Plug Back ("APD") showed that this well was to have been drilled to a total depth of 6,410 feet in order to test the Blanco-Mesaverde gas producing interval, however the well actually TD'ed at 3,480 feet. Please explain the reason for this discrepancy? Also provide me with a type log from this well with the tops of all formations labeled and marked.

In order to ensure that correlative rights are being adequately protected, please provide me with: (i) a map of the Rosa Unit; and (ii) a map showing the Basin-Fruitland coal gas participating area of the Rosa Unit.

Thank you for your cooperation in this matter.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

MES/ms

cc: New Mexico Oil Conservation Division - Aztec

U. S. Bureau of Land Management - Farmington

U. S. Forest Service - Bloomfield