

--	--	--	--	--

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -

ADMINISTRATIVE APPLICATION COVERSHEET

THIS COVERSHEET IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS

Application Acronyms:

- [NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location]
- [DD-Directional Drilling] [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]

JH [1] TYPE OF APPLICATION - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Directional Drilling
 - NSL NSP DD 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

[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] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I further verify that all applicable API Numbers are included. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

JOHN C. THOMPSON
 Print or Type Name

[Signature]
 Signature

ENGINEER / AGENT
 Title

5/16/01
 Date



Ms. Lori Wrotenbery
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 8705

April 14, 2001

***Re: Request for Administrative approval for Non-Standard Dakota Location
Rosa Unit 44B (Sec 35/T32N/R6W, 660' fnl & 2535' fwl, Rio Arriba County, New Mexico)***

Dear Ms. Wrotenbery,

Williams Production Company is requesting an administrative approval to construct the Rosa 44B as a dual Mesaverde/Dakota with the Dakota being non-standard. Williams has already been issued an APD for drilling a standard infill Mesaverde well by the BLM.

Williams intends to make the well a dual well thereby capturing the reserves from the Dakota with a single well bore. Originally, the surface location was picked by considering drainage from the offset Mesaverde wells and topography constraints. In this case, Williams would be unable to move the location any further to the west because of the severe topography changes. (The ridge narrows to the northwest and drops off on either side down to the lake).

Therefore, the reasons for requesting administrative approval for a non-standard location are:

1. Topography (narrow ridge and severe cliffs to the west & southwest) – see topo map.
2. The current location has a good fit with projected drainage patterns within the Mesaverde formation.
3. By itself, the Dakota (in this area) is at best very marginal economically and a dual completion helps capture additional reserves from the Dakota that otherwise would not be able to be economically developed.
4. Utilizing a single well bore for a dual completion would also negate the need for additional disturbance of another well, ie. well pad, road, pipeline ROW, etc.

Energen Resources Corporation is the unit operator of the San Juan 32-5 Unit which is directly to the north of the proposed Rosa Unit 44B location (section 35). Please find enclosed the signed waiver showing that Energen does not object to the non-standard location. As the Unit Operator of the Rosa Unit, Williams Production is the only other operator involved.

Please find attached a drilling plat with topographical map showing location as well as a portion of the unit map showing where the well is located within the unit.

If you have any questions or concerns, please feel free to contact me anytime.

Sincerely,

John C. Thompson
Engineer

c:wpx/nsdk144b

District I
PO Box 1900, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994
Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

District II
PO Drawer 00, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

District III
1000 Rio Brazos Rd., Aztec, NM 87410

AMENDED REPORT

District IV
PO Box 2088, Santa Fe, NM 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code		*Pool Name	
		72319 / 71599		Blanco Mesaverde / Basin Dakota	
*Property Code		*Property Name			*Well Number
17033		ROSA UNIT			44B
*GRID No.		*Operator Name			*Elevation
120782		WILLIAMS PRODUCTION COMPANY			6658'

¹⁰ Surface Location

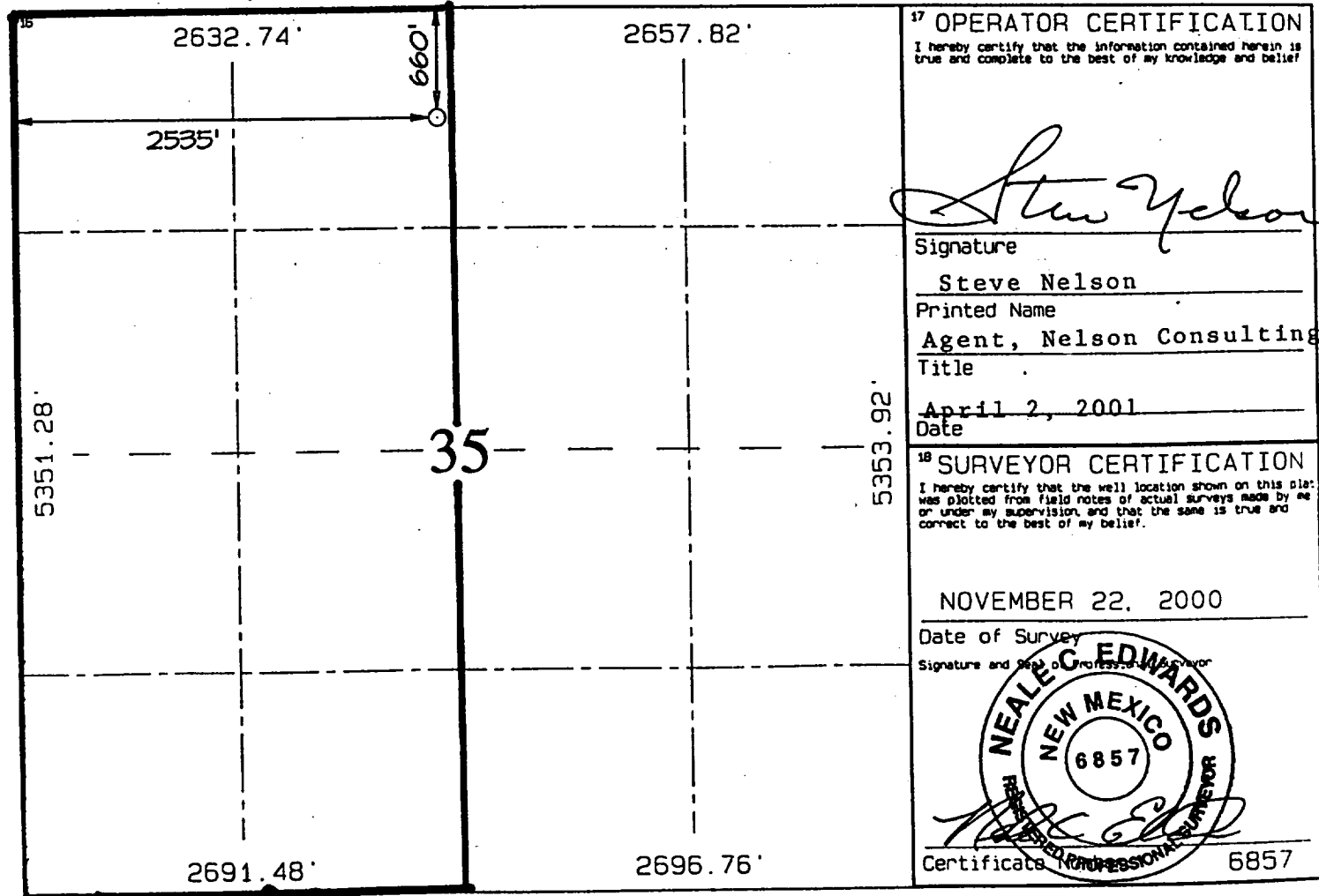
U. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	35	32N	6W		660	NORTH	2535	WEST	RIO ARRIBA

¹¹ Bottom Hole Location If Different From Surface

U. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
320 - W/2	I	U	

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Steve Nelson
Signature

Steve Nelson
Printed Name
Agent, Nelson Consulting
Title

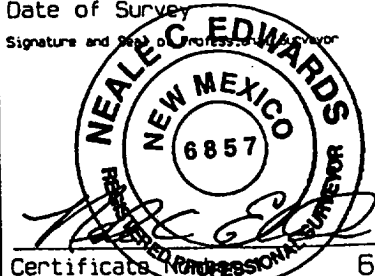
April 2, 2001
Date

¹⁸ SURVEYOR CERTIFICATION

I hereby certify that the well location shown 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.

NOVEMBER 22, 2000

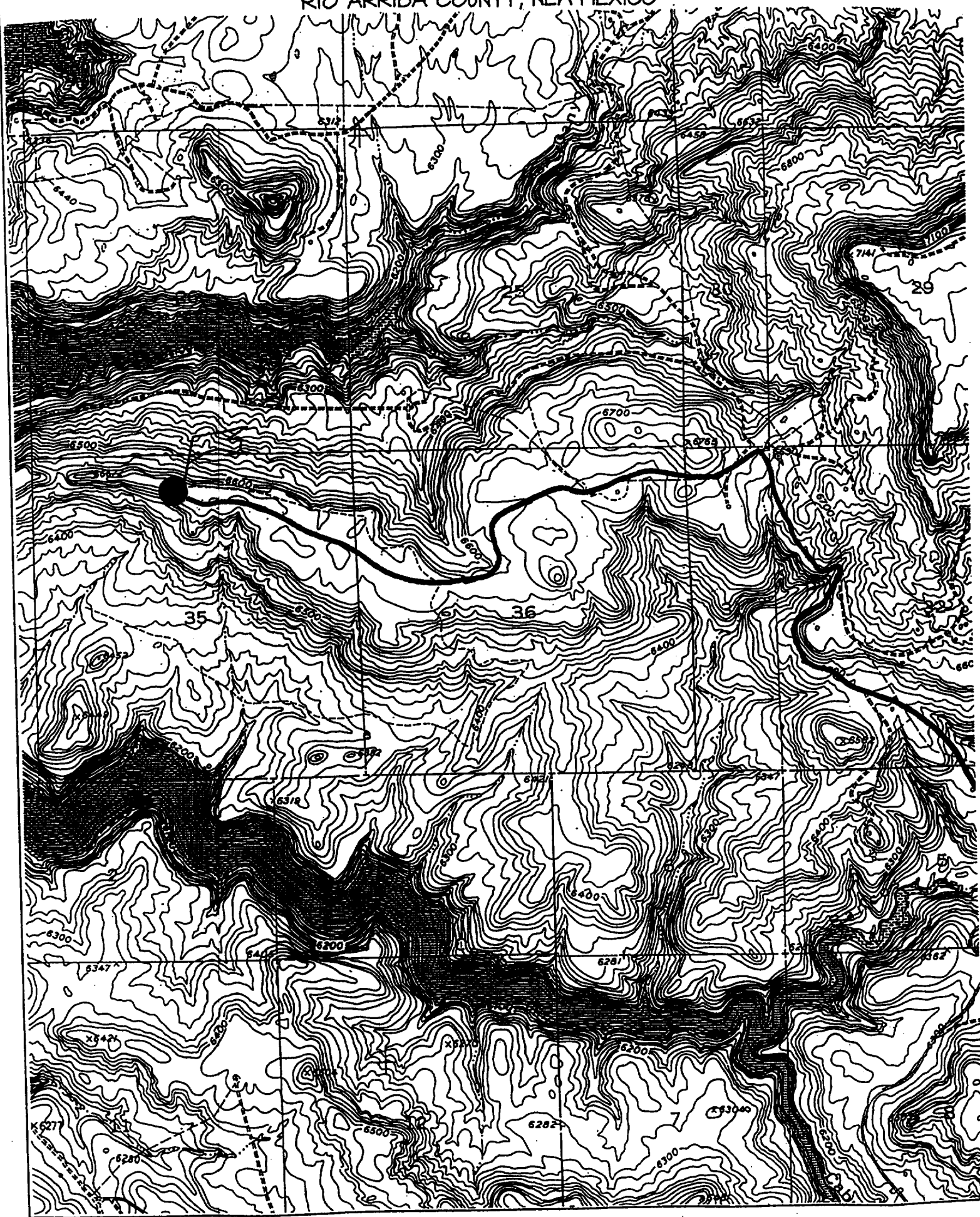
Date of Survey
Signature and Seal of Professional Surveyor



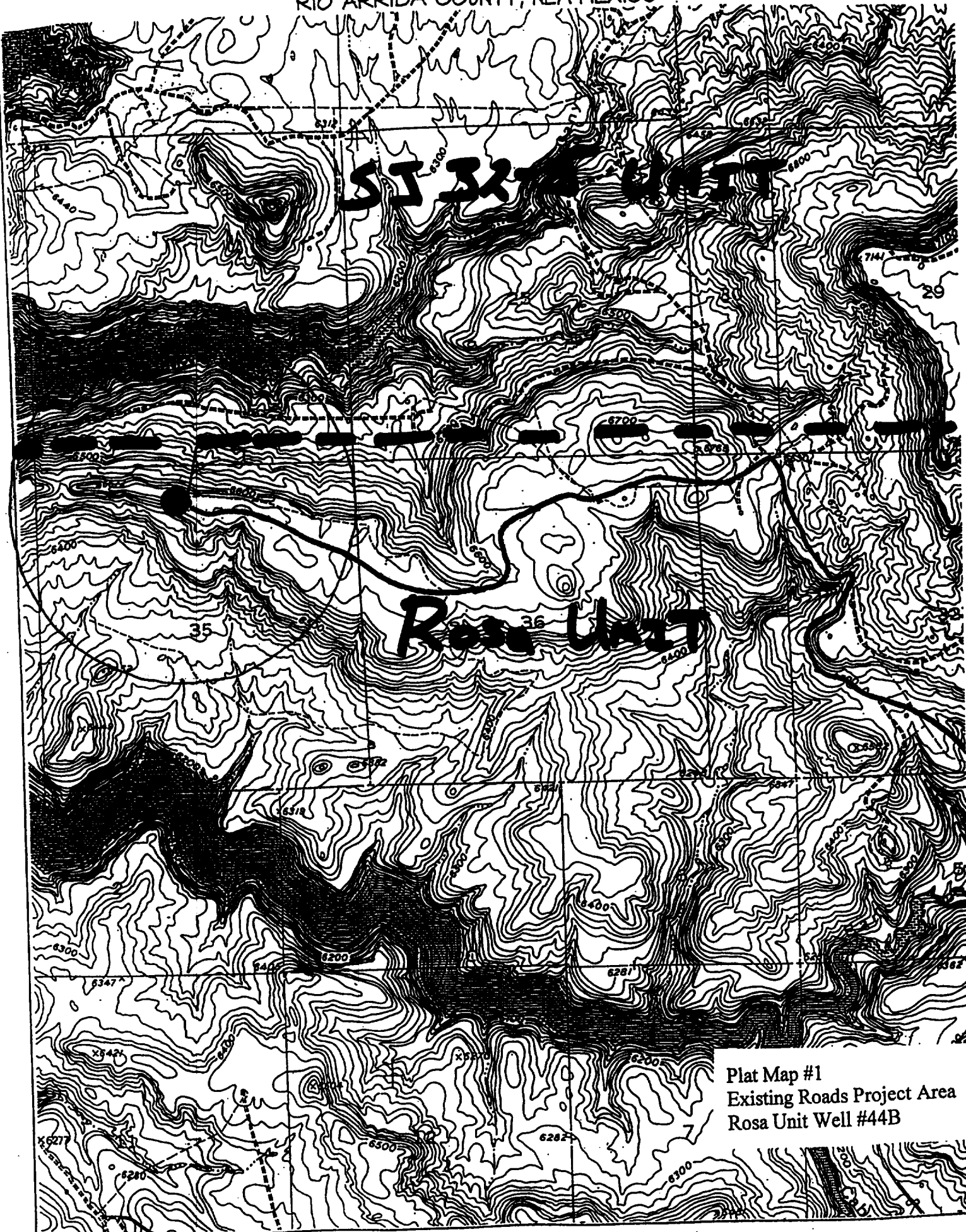
Certificate No. 6857

WILLIAMS PRODUCTION COMPANY ROSA UNIT #44B

660' FNL & 2535' FNL, SECTION 35, T32N, R6W, N.M.P.M.
RIO ARRIBA COUNTY, NEW MEXICO



660' FNL & 2535' FNL, SECTION 35, T32N, R6W, N.M.P.M.
RIO ARRIBA COUNTY, NEW MEXICO



Plat Map #1
Existing Roads Project Area
Rosa Unit Well #44B



**Energen Resources Corp
Attn. Land Department
2198 Bloomfield Hwy
Farmington, NM 87401**

5/16/01

Re: Rosa 44B (Non-standard Dakota Location)

Williams Production Company has proposed to the New Mexico Oil Conservation that the Rosa 44B (Mesaverde/Dakota dual well) be allowed to be drilled to the Dakota with the Dakota being non-standard. The well was originally staked as a Mesaverde well within the legal spacing requirements for infill Mesaverde wells, and has been issued an APD from the BLM for a stand alone Mesaverde well.

Williams intends to extend the Rosa 44B to the Dakota formation to capture additional reserves that otherwise would not be developed. Due to topography Williams would be unable to move to the location any further to the west because of severe topography changes. (The ridge narrows to the northwest and drops off on either side down to the lake).

If Energen wishes to *oppose* this location, you have **20 days** from receiving this letter to contact the NMOCD and file an objection.

If Energen *does not oppose* this location, please sign and date the bottom of this letter which will be considered a waiver and return to the above address.

Thank you for your consideration in this matter, if you have any questions or concerns please feel free to contact me anytime.

Sincerely,

John C. Thompson
Engineer

Energen Resources Corp. does not object to the Williams Production Company's proposed Rosa Unit 44B (Mesaverde/Dakota dual well) located Sec 35/T32N/R6W, 660' ful & 2535' fwl)

Signature: _____

Printed Name: _____

Title: _____

Date: _____

[Handwritten Signature]
[Handwritten Signature]
[Handwritten Signature]
[Handwritten Signature]
GARY BRINK
District Superintendent
5/17/01