



SUSPENSE

ENGINEER

LOGGED IN

TYPE

APP NO.

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

Signature

Title

Date

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

Brian Wood
CONSULTANT

12-15-01

e-mail Address

brian@permitswest.com

REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION
FOR RICHARDSON OPERATING CO.

RPC 18 #3 GAS WELL

1048' FSL & 724' FWL SEC. 18, T. 29 N., R. 13 W., SAN JUAN COUNTY, NM

I. The well is on private surface and a private oil and gas lease. The proposed location is non-standard for the West Kutz Pictured Cliffs. Acreage dedicated to a Pictured Cliffs well must be at least 70% of a standard 160 acre quarter section (i.e., ≥ 112 acres). This quarter section (actually Lots 3 & 4 and E2SW4) is only 90.85 acres, or 57% of 160 acres. The small size of the quarter section is due to the over century old General Land Office survey (see attachment). The APD is attached.

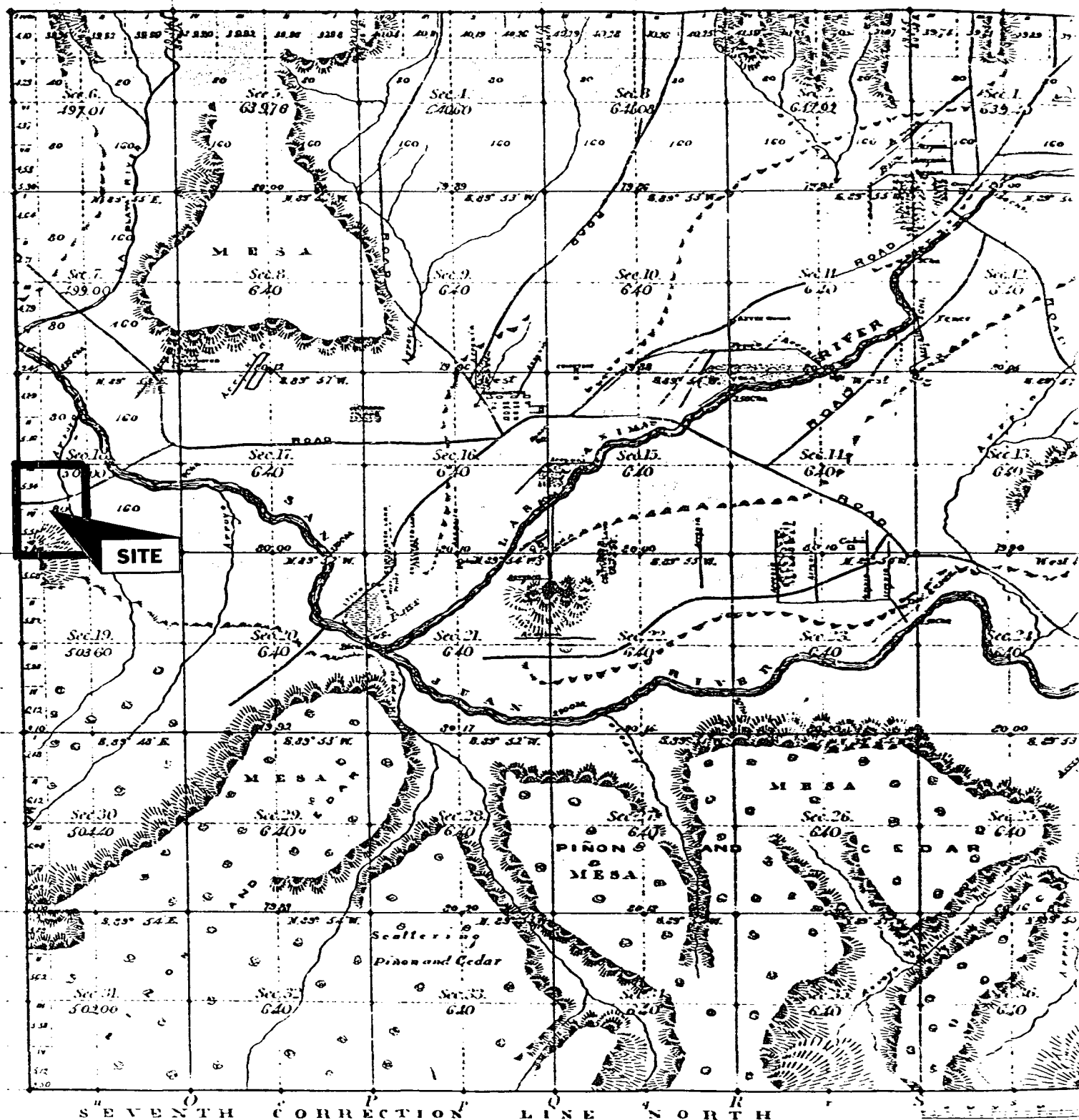
II. A C-102 showing the well location and proration unit (solid line marking Lots 3 & 4 and E2SW4 = 90.85 acres) for the Pictured Cliffs is attached. A General Land Office survey plat is also attached which shows the smaller (90.85 acres) than standard size of the southwest quarter of Section 18. Richardson's leasehold (= dashed lines) is shown on the attached composite copy of the Farmington South and Kirtland USGS topo maps. The well is 1,048' from the closest non-Richardson operated lease.

III. According to NM Oil Conservation Records reviewed in their Santa Fe office on December 12, 2001 and on line on December 15, 2001; there is no production from the Pictured Cliffs within a minimum 2,623' radius. Closest such well is Richardson's Fawkes #1 at 740 FS & 790 FE 18-29n-13w. A composite copy of the Farmington South and Kirtland 7.5' USGS maps is attached showing the proposed well site, existing producing wells (2 Dakota and 4 PC {all Richardson}), existing water disposal well (Richardson into the Mesa Verde), and plugged and abandoned wells (24). There is one lease within a minimum 724' radius. Richardson is the operator of its fee lease and leases within a minimum 1,048'. Registered letters were sent on December 17, 2001 to the offset interest owners. A copy of the receipts and letters will be provided.

IV. Composite copies of the Farmington South and Kirtland USGS maps are attached. The proposed well site is marked. Proration units are Lots 3 & 4

TOWNSHIP N: 29 NORTH RANGE N: 13 WEST NEW MEXICO PRINCIPAL MERIDIAN

G F E D C B A



Total number of Acres 2220.77

Survey Designated	By Whom Surveyed	Date of Contract	Amount of Survey	When Surveyed	Alarid's Description
Township lines	Taylor and Pined	Sept. 11 1860	M. 100. 100.	Nov. 1860	N. 10° - 15° E.
Subdivisions	Taylor and Pined	Sept. 11 1860	S. 100. 100.	Nov. 1860	N. 10° - 15° E.
One Line North	Charles M. Fitch	Aug. 2 - 1877		Oct. 1877	N. 10° E.

The above map of Township N: 29 North
Principal Meridian is made
out of the survey thereof on file in this
Office General Office
South of the State House
April 19, 1880

State of New Mexico
Energy, Minerals & Mining Resources Department
OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

Form C - 102

☐ AMENDED REPORT

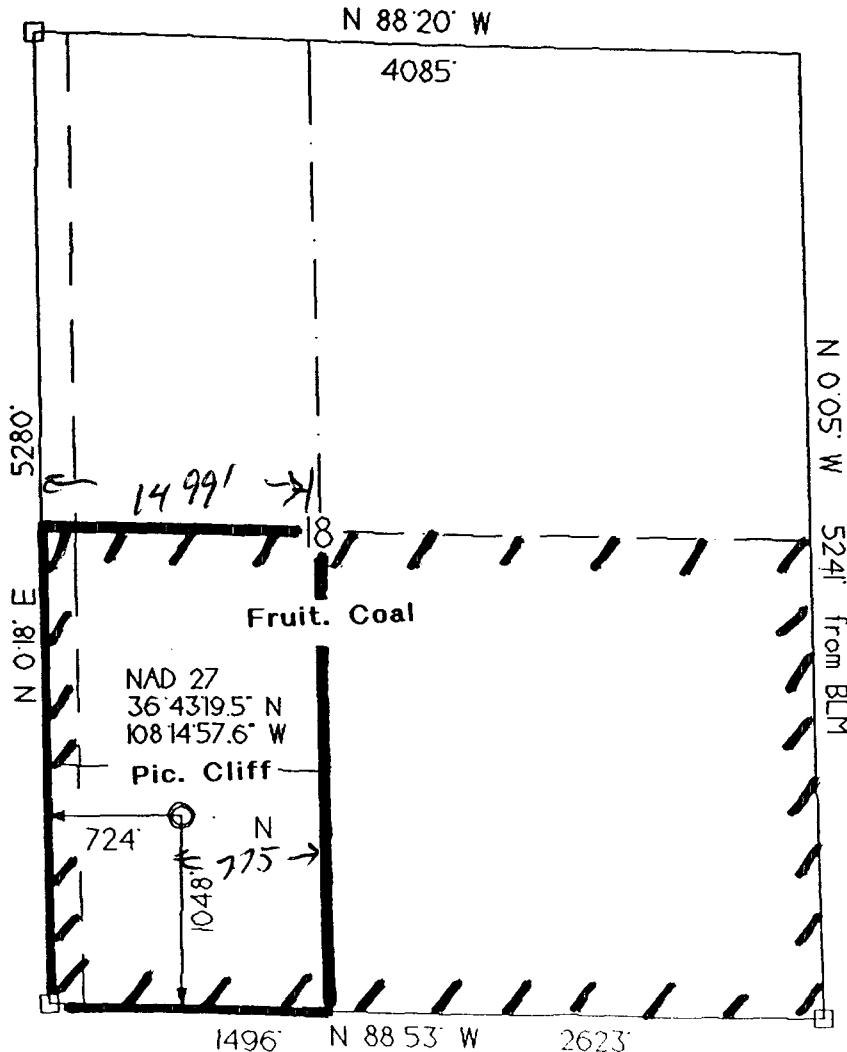
WELL LOCATION AND ACREAGE DEDICATION PLAT

APA Number	Pool Code	Pool Name
	71629 & 79680	BASIN FRUIT. COAL & WEST KUTZ PC
Property Code	Property Name	Well Number
	RPC 18	#3
OGRD No.	Operator Name	Elevation
019219	RICHARDSON OPERATING COMPANY	5255'

Surface Location									
UL or Lot	Sec.	Twp.	Rge.	Lot Idn.	Feet from >	North/South	Feet from >	East/West	County
N	18	29 N.	13 W.		1048'	SOUTH	724'	WEST	SAN JUAN

Bottom Hole Location if Different From Surface									
UL or Lot	Sec.	Twp.	Rge.	Lot Idn.	Feet from >	North/South	Feet from >	East/West	County
Dedication	Joint ?	Consolidation		Order No.					

NO ALLOWABLE WILL 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

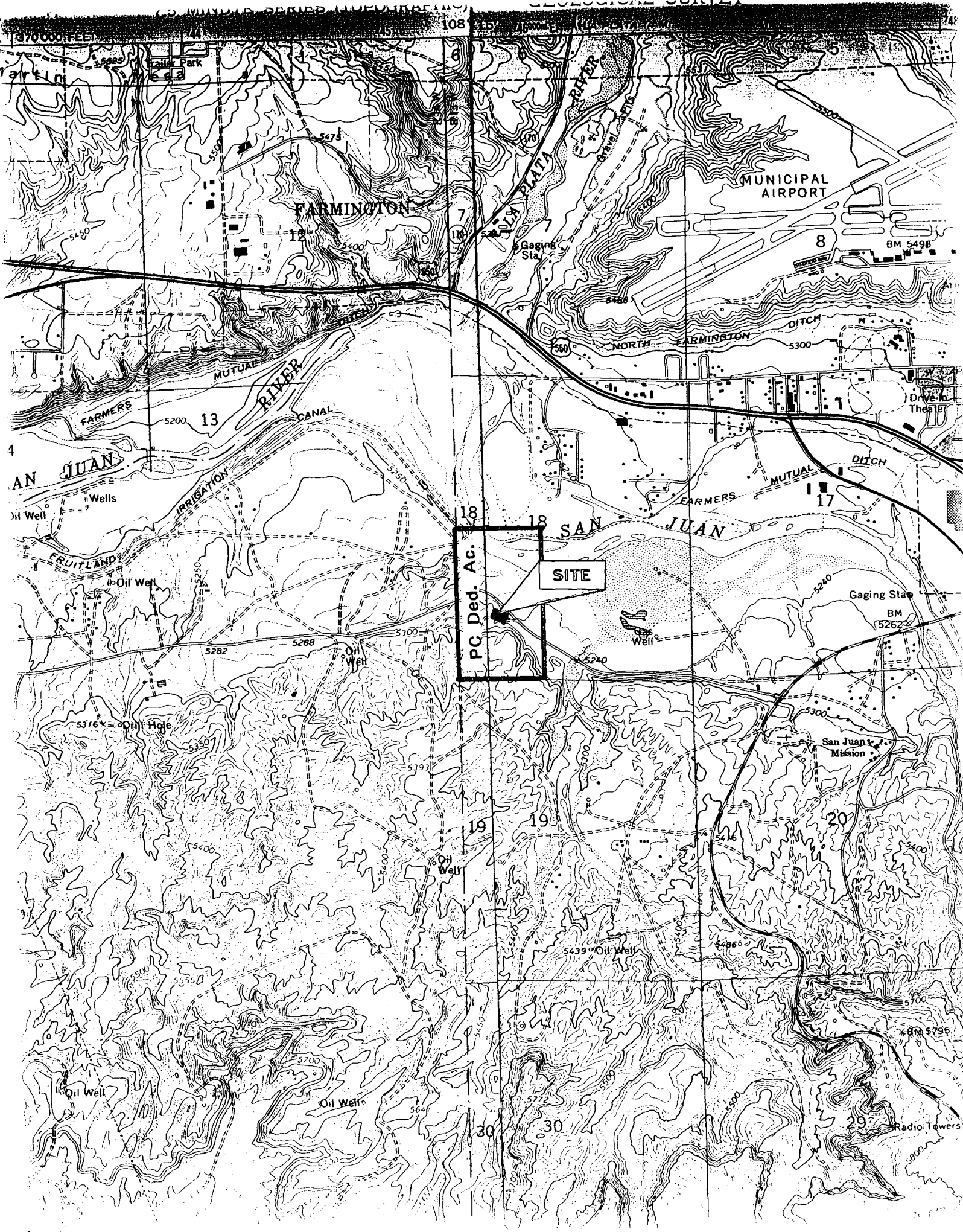
Date DEC. 9, 2001

SURVEYOR CERTIFICATION

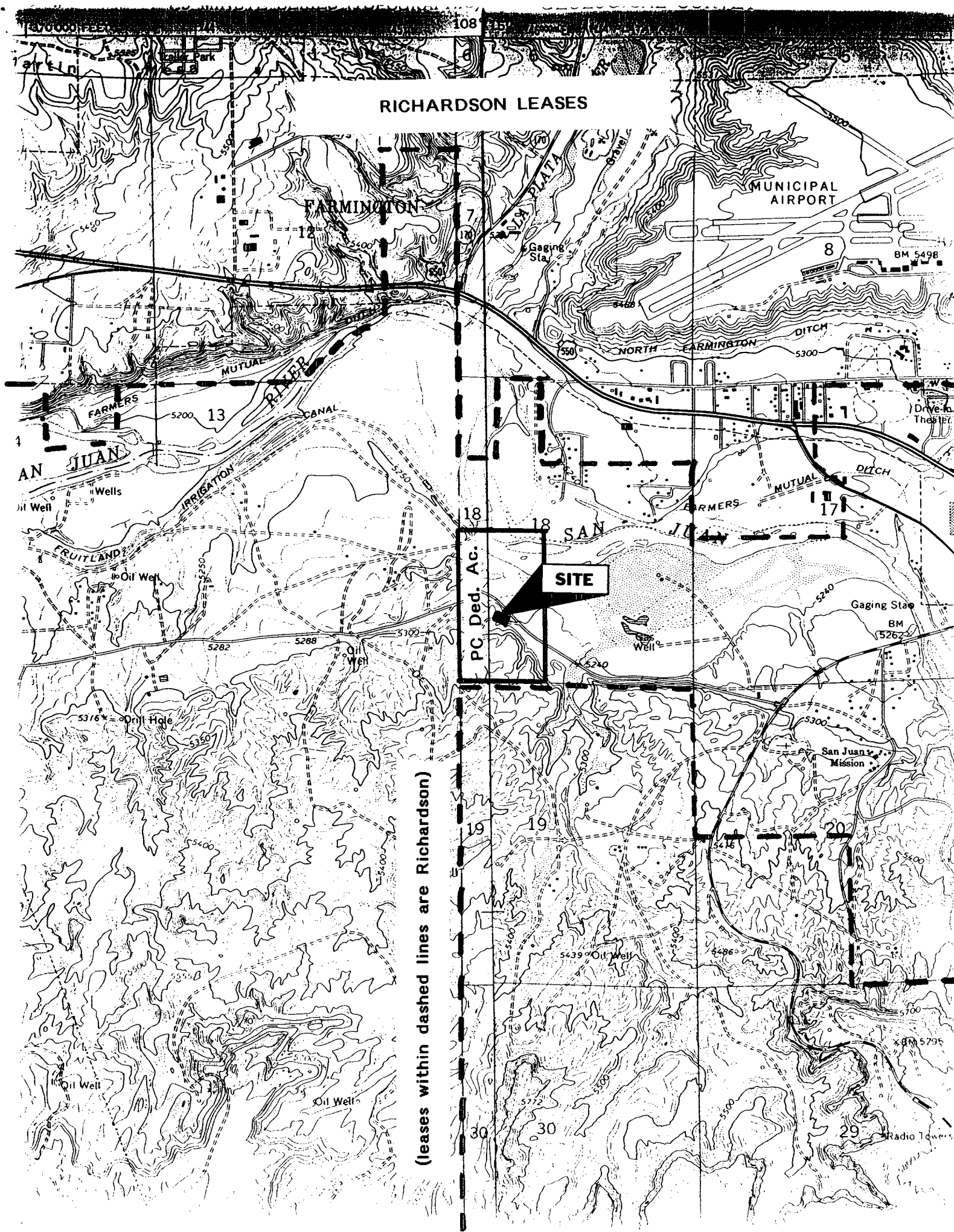
I hereby certify that the well location on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.
Date of Survey

Signature *David L. Heston*
Professional Surveyor

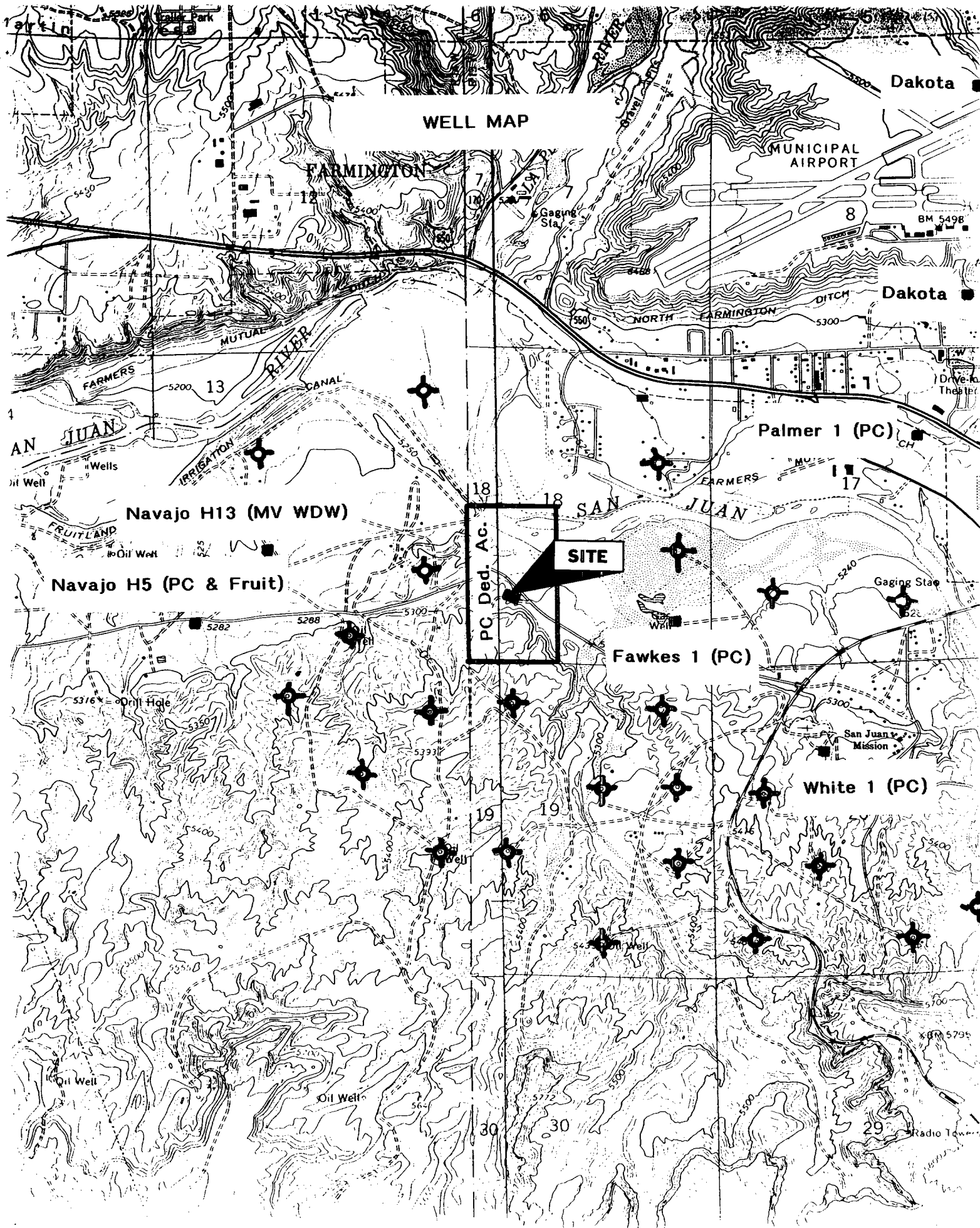




RICHARDSON LEASES



(leases within dashed lines are 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

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-101
Revised March 17, 1999

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 RPC 18		⁴ API Number 30 -
⁵ Property Name		⁶ Well No. 3

⁷Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	18	29n	13w		1048	South	724	West	SJ

⁸Proposed 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 West Kutz Picture Cliffs						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 P	¹⁵ Ground Level Elevation 5255'
¹⁶ Multiple Yes	¹⁷ Proposed Depth 1,150'	¹⁸ Formation Lewis	¹⁹ Contractor .	²⁰ Spud Date 1-15-02

²¹Proposed 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	1,150'	155 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:

Printed name:

Title:

Date: December 9, 2001

Phone: (505) 466-8120

OIL CONSERVATION DIVISION

Approved by:

Title:

Approval Date:

Expiration Date:

Conditions of Approval:

Attached ☐

State of New Mexico
Energy, Minerals & Mining Resources Department
OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

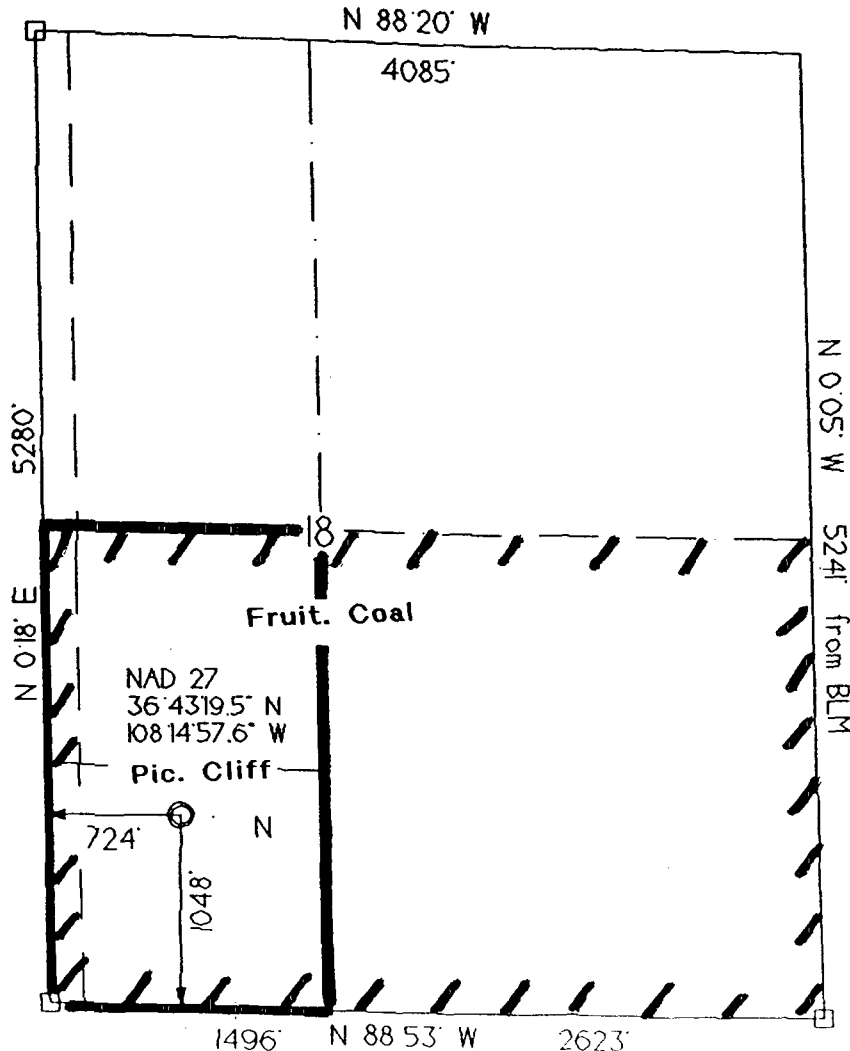
Form C - 102

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

APA Number		Pool Code		Pool Name					
		71629 & 79680		BASIN FRUIT. COAL & WEST KUTZ PC					
Property Code		Property Name						Well Number	
		RPC 18						#3	
OGRID No.		Operator Name						Elevation	
019219		RICHARDSON OPERATING COMPANY						5255'	
Surface Location									
UL or Lot	Sec.	Twp.	Rge.	Lot Idn.	Feet from	North/South	Feet from	East/West	County
N	18	29 N.	13 W.		1048'	SOUTH	724'	WEST	SAN JUAN
Bottom Hole Location if Different From Surface									
UL or Lot	Sec.	Twp.	Rge.	Lot Idn.	Feet from	North/South	Feet from	East/West	County
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 DEC. 9, 2001

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 *[Signature]*
Professional Surveyor
OCTOBER 2001
6844
REGISTERED LAND SURVEYOR

PERMITS WEST, INC.
PROVIDING PERMITS for LAND USERS
17 Verano Loop, Santa Fe, New Mexico 87505 (505) 466-8120

December 15, 2001

BLM
1235 LaPlata Highway
Farmington, NM 87401

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 RPC 18 #3 gas well. The minimum acreage to be dedicated to a Pictured Cliffs gas well is 112 acres. The southwest quarter of Section 18 has only 90.85 acres, or less than the standard minimum. Thus, it is a non-standard location. The proposed well is 724' from the closest lease line, 724' from the closest acreage dedication line, and 2623' from the closest Pictured Cliffs producer (Richardson's Fawkes #1 well). See attached map for more details.

Well Name: RPC 18 #3

Total Depth: 1,150'

Proposed Producing Zones: Pictured Cliffs sandstone & Fruitland coal

Acreage Dedication: 90.85 ac. (≈SW4) to PC & 250.85 ac. (≈S2) to Fruit.

Location: 1048' FSL & 724' FWL Sec. 18, T. 29 N., R. 13 W.,

San Juan County, NM on a private lease

Approximate Location: ≈1 air miles southwest of Farmington, NM

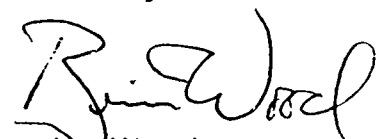
Applicant Name: Richardson Operating Co. (303) 830-8000

Applicant's Address: 1700 Lincoln St., Suite 1700, Denver, Co. 80203

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 (505) 827-7131.

questions.

Sincerely,


Brian Wood

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 3.94

Postmark
Here

Sent To	BLM
Street, Apt. No., or PO Box No.	1235 LaPlata
City, State, ZIP+4	Farmington NM 87401

7000 1670 0012 5356 8629

PERMITS WEST, INC.
PROVIDING PERMITS for LAND USERS
17 Verano Loop, Santa Fe, New Mexico 87505 (505) 466-8120

Dec. 15, 2001

Edwards Energy Corp.
1401 17th St., Suite 1400
Denver, Co. 80202

Dear Keith,

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 RPC 18 #3 gas well. The minimum acreage to be dedicated to a Pictured Cliffs gas well is 112 acres. The southwest quarter of Section 18 has only 90.85 acres, or less than the standard minimum. Thus, it is a non-standard location. The proposed well is 724' from the closest lease line, 724' from the closest acreage dedication line, and 2623' from the closest Pictured Cliffs producer (Richardson's Fawkes #1 well). See attached map for more details.

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Approximate Location: ≈1 air miles southwest of Farmington, NM

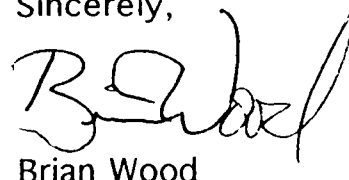
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Applicant's Address: 1700 Lincoln St., Suite 1700, Denver, Co. 80203

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 address is 2040 S. Pacheco, Santa Fe, NM (505) 827-7131.

questions.

Sincerely,


Brian Wood

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0012 5356 8636

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 3.94

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 3.94

Postmark
Here

Sent To	Edwards Energy
Street, Apt. No. or P.O. Box No.	1401 17th St., # 1400
City, State, ZIP+4	Denver Co 80202

PERMITS WEST, INC.

PROVIDING PERMITS for LAND USERS

37 Mirano Loop, Santa Fe, New Mexico 87505

(505) 466-8120

Dec. 15, 2001

Navajo Nation Minerals Dept.
P. O. 1910
Window Rock, Az. 86515

Dear Akhtar,

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 RPC 18 #3 gas well. The minimum acreage to be dedicated to a Pictured Cliffs gas well is 112 acres. The southwest quarter of Section 18 has only 90.85 acres, or less than the standard minimum. Thus, it is a non-standard location. The proposed well is 724' from the closest lease line, 724' from the closest acreage dedication line, and 2623' from the closest Pictured Cliffs producer (Richardson's Fawkes #1 well). See attached map for more details.

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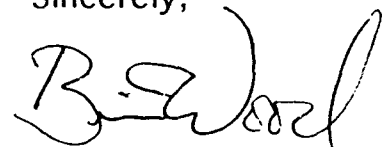
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questions.

Sincerely,



Brian Wood

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 3.94

Postmark
Here

Sent To	Minerals Dept
Street, Apt. No., or PO Box No.	PO Box 1910
City, State, ZIP+4	Window Rock Az 86515

5098 9555 0012 5356 8605 0000 1670

PERMITS WEST, INC.

PROVIDING PERMITS for LAND USERS

17 Verano Loop, Santa Fe, New Mexico 87505

(505) 466-8120

December 15, 2001

Paramount Petroleum Corp.
P. O. Box 22763
Houston, Tx. 77027

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y questions.

Sincerely,

Brian Wood

U.S. Postal Service CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$3.94

Postmark
Here

Sent To	Paramount Petrol.
Street, Apt. No., or PO Box No.	PO Box 22763
City, State, ZIP+4	Houston Tx 77027