March 8, 2000

Via Federal Express

New Mexico Oil Conservation Division Attention: Mr. Mike Stogner 2040 South Pacheco Santa Fe, New Mexico 87505 One Williams Center P.O. Box 3102

Williams Production Company

40% COMPERVATION DIVISION

Re:

Application for Non-Standard Gas Proration Units

Blanco Mesaverde

Rosa Unit #22 and #22A Mesaverde Formation N/2 Section 18, T31N, R5W; 231.89 Acres Rosa Unit #182 and #182A Mesaverde Formation

S/2 Section 18, T31N, R5W; 231.83 Acres

Rio Arriba County, New Mexico

Gentlemen:

Williams Production Company, as Rosa Unit Operator, respectfully requests permission to produce the above captioned wells as Non-Standard Proration Gas Units. The unorthodox size of these units is necessitated by a variation in the legal subdivision of the U.S. Public Land Survey. Williams Production Company is the offset Operator.

The proration unit for the Rosa Unit #22 Mesaverde formation well was originally submitted as the E/2 of Section 18 when it was drilled in 1957. Williams Production Company believes that in order to fully develop Section 18 the appropriate proration unit for the Rosa Unit #22 should be changed to the N/2 of Section 18, T31N, R5W, and by this application requests approval of this change.

Sincerely,

M. Vern Hansen Senior Landman

cc: Bureau of Land Management, Farmington

New Mexico Oil Conservation Division, Aztec