

DATE IN 07/18/13	SUSPENSE	ENGINEER DB	LOGGED IN 07/23/13	TYPE USL	APP NO. PAXK1320432430
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



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] 30-075-30994
 [A] Location - Spacing Unit - Simultaneous Dedication XTO Energy, Inc
☒ NSL ☐ NSP ☐ SD Ropco 16,003
 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 AMEND NSL-4785
- [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.

Cy Zimmerman	See attachments	Associate Landman	07/15/2013
Print or Type Name	Signature	Title	Date
		Cy_Zimmerman@xtoenergy.com	
		e-mail Address	



RECEIVED

JUL 15 10 23 26

U.S. Certified Mail

Mr. David Brooks
New Mexico Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87504

Re: Revised Application for Administrative Approval of
Unorthodox Location-NSL 4785
XTO Energy Inc.'s Ropco 16-3
2506' FSL and 1006 FWL, Section 16, T29N, R14W
San Juan County, New Mexico
Fruitland Coal Formation

Dear Mr. Brooks:

XTO Energy Inc. (XTO) hereby requests an amended Non-Standard Location (NSL) to correct the acreage from a stand up spacing unit to the laid down spacing in the Ropco 16-3. Administrative Order NSL-4785 dated 9/30/2002 states the spacing unit for the Fruitland Coal formation is the W/2 of section 16 whereas the well is currently spaced as a lay down unit in the S/2. Attached for your reference are the following exhibits:

1. Well location plat (Communitization Plat)
2. Original NSL application & administrative approval

The existing location will not conform to the current footage requirements and also encroaching on the N/2 320-acre unit. XTO operates the offsetting wells in the Fruitland Coal formation in the N/2 of section 16. The only affected interest owner is the NM State Land Office in which notice was sent when applying for the original NSL.

Taking this into account, in addition to the statements made above, XTO requests your administrative approval for the unorthodox location amending NSL-4785 to correct the acreage from a W/2 to the S/2 Fruitland Coal spacing unit. Should you need any additional information, please feel free to contact me at (817) 885-1130 or Cy_Zimmerman@xtoenergy.com.

Yours truly,

Cy Zimmerman
Associate Landman



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

BETTY RIVERA

Cabinet Secretary

September 30, 2002

Lori Wrotenbery

Director

Oil Conservation Division

Richardson Operating Company
c/o Permits West, Inc.
37 Verano Loop
Santa Fe, New Mexico 87505
Attention: Brian Wood
brian@permitswest.com

Telefax No. (505) 466-9682

Administrative Order NSL-4785

Dear Mr. Wood:

Reference is made to the following: (i) your application on behalf of the operator, Richardson Operating, Inc. ("Richardson"), that was submitted to the New Mexico Oil Conservation Division ("Division") on September 9, 2002 (**application reference No. pKRV0-225331843**); and (ii) the Division's records in Santa Fe and Aztec: all concerning Richardson's request for an unorthodox gas well location in both the Undesignated Twin Mounds-Fruitland Sand-Pictured Cliffs Pool (**71629**) and Basin-Fruitland Coal (Gas) Pool (**86620**) for its proposed ROPCO "16" Well No. 3 (**API No. 30-045-30994**) to be drilled 2506 feet from the South line and 1006 feet from the West line (Unit L) of Section 16, Township 29 North, Range 14 West, NMPM, San Juan County, New Mexico.

It is our understanding that Richardson intends to dually complete this well and that: (i) the W/2 of Section 16, being a standard 320-acre, more or less, stand-up gas spacing unit for the Basin-Fruitland Coal (Gas) Pool; and (ii) the SW/4 equivalent of Section 16, being a standard 160-acre, more or less, gas spacing unit for the Undesignated Twin Mounds-Fruitland Sand-Pictured Cliffs Pool, are to be dedicated to the proposed ROPCO "16" Well No. 3.

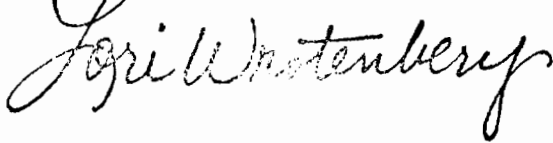
This application has been duly filed under the provisions of: (i) Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999; and (ii) the applicable provisions of the "*Special Rules and Regulations for the Basin-Fruitland Coal Gas Pool*," as promulgated by Division Order No. R-8768, as amended.

By the authority granted me under the provisions of Division Rule 104.F (2) and Rule 8 of the special Basin-Fruitland Coal (Gas) Pool rules, the above-described unorthodox Fruitland coal and Fruitland Sand/Pictured Cliffs gas well location for Richardson's proposed ROPCO "16" Well No. 3 is hereby approved.

Administrative Order NSL-4785
Richardson Operating Company
September 30, 2002
Page 2

Jurisdiction of this case is retained for the entry of such further orders as the Division deems necessary.

Sincerely,

A handwritten signature in cursive script, reading "Lori Wrotenbery". The signature is written in dark ink and is positioned below the word "Sincerely,".

Lori Wrotenbery
Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Aztec
New Mexico Oil Conservation Division - Santa Fe
U. S. Bureau of Land Management - Farmington

RECEIVED OOD

2002 JUL 18 P 2: 26



9/9/02
DATE 9/9/02 ENGINEER MS LOGGED IN MV TYPE NSL APP NO. 225331843

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505

ABOVE THIS LINE FOR DIVISION USE ONLY

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[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

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

Signature

Title

CONSULTANT

Date

9-9-02

e-mail Address

brian@permitswest.com



REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION
FOR RICHARDSON OPERATING CO.
ROPCO 16 #3 GAS WELL
2506' FSL & 1006' FWL SEC. 16, T. 29 N., R. 14 W., SAN JUAN COUNTY, NM

I. The well is on state surface and on state oil and gas lease V-05375. The proposed location is non-standard for the Twin Mounds Pictured Cliffs and Basin Fruitland Coal due to topography (San Juan River floodplain) and land use (irrigated fields). The well must be at least 660' from all quarter section lines. This proposed well is 134' from the north line of the southwest quarter of Section 16. Thus, it is 134' too far north. Richardson controls the Pictured Cliff and Fruitland Coal rights to the north and already has an approved APD for a standard location (Ropco 16 #2) in the northwest quarter of Section 16 (1186' FN & 1392' FW). The Ropco 16 #2 is 1,634' north of the Ropco 16 #3. The APD (Exhibit A) is attached.

II. A C-102 (Exhibit B) showing the well location and pro ration units (solid line marking the southwest quarter = 160 acres) for the Pictured Cliffs and Basin Fruitland Coal (dashed line marking the west half = 320 acres) is attached. Richardson's lease V-05375 (= solid line) is shown on the attached copy (Exhibit C) of the Kirtland USGS topo map. The remainder of the section is Tribal or state leases held by Richardson and which are or will be communitized. The well is 1,006' from the closest non-Richardson operated lease. A standard location would be closer to the exterior of the lease.

III. According to NM Oil Conservation Records; there is no production from the Pictured Cliffs or Fruitland Coal within a minimum 3,000' radius. Closest such proposed well is Richardson's Ropco 16 #2 at 1186' FNL & 1392' FWL 16-29n-14w, which is 1,634' away. A copy of the Kirtland 7.5' USGS map (Exhibit D) is attached showing the proposed well site, existing producing wells (1 Gallup oil well, 4 Pictured Cliffs and/or Fruitland {all Richardson}), and 10 plugged and abandoned wells within a mile. Richardson is the operator of all leases within a minimum 1,006'. A registered letter was sent on September 9, 2002 to the only affected interest owner (NM State Land Office). A copy of the receipt will be provided.

IV. A copy of the Kirtland USGS map is attached (Exhibit E). The proposed well site is marked. Pictured Cliffs pro ration unit (solid line) is all of the southwest quarter of Section 16, which is 160 acres in size. Fruitland Coal pro ration unit (dashed line) is all of the west half of Section 16, which is 320 acres in size. A dotted line marks the standard drilling window. Existing pro ration units for the Pictured Cliffs and Fruitland are similarly depicted.

V. Topography and land use force a non-standard location. The entire drilling window is covered by the San Juan River, its floodplain, or irrigated fields (see Exhibits E and F). Indeed, despite being so far north, the south edge of the pad still borders a cattail swamp.

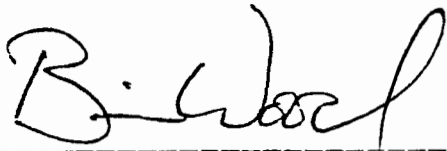
VI. Archaeology is not an issue.

VII. The non-standard location is requested because of surface conditions. All of the drilling window (see dotted line on Exhibit E and air photo on Exhibit F) is in the San Juan River, its floodplain, or irrigated fields.

VIII. Directional drilling is not a feasible for such a shallow well.

IX. I hereby certify that notice has been sent to the following lessees, lessors, operators of spacing units, or owners of undrilled leases which adjoin the applicant's spacing unit on one or more of the two sides or the single closest corner to the proposed well and that the information is current and correct:

New Mexico State Land Office

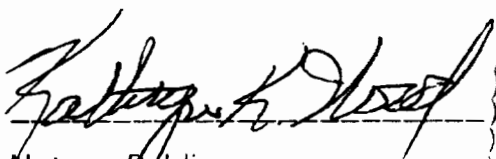


Brian Wood, Consultant

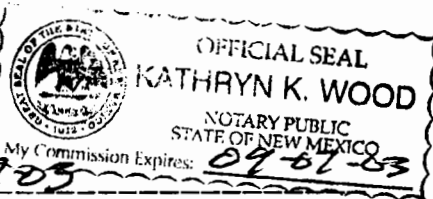
September 9, 2002
Date

STATE OF NEW MEXICO)
) SS:
COUNTY OF SANTA FE)

The foregoing instrument was acknowledged before me this 9th day of September, 2002 by Brian Wood. Witness my hand and official seal.



Notary Public



My Commission Expires: 09-07-03

Business Address: 37 VERANO LOOP, SANTA FE, NM 87508

cc: Aztec OCD, 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

Operator Name and Address Richardson Operating Company (303) 830-8000 1700 Lincoln St., Suite 1700, Denver, Co. 80203		OGRID Number 19219
Property Code Ropco 16		API Number 30 - 045 - 30994
Property Name Ropco 16		Well No. 3

Surface Location

UL or lot no.	Section	Township	Range	Lot 1dn	Feet from the	North/South line	Feet from the	East/West line	County
L	16	29n	14w		2506	South	1006	West	SJ

Proposed Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot 1dn	Feet from the	North/South line	Feet from the	East/West line	County

Proposed Pool 1 Twin Mounds Picture Cliffs Ext.	Proposed Pool 2 Basin Fruitland Coal
-----------------------------------------------------------	------------------------------------------------

Work Type Code N	Well Type Code G	Cable/Rotary R	Lease Type Code S	Ground Level Elevation 5175'
Multiple Yes	Proposed Depth 1,050'	Formation Lewis	Contractor .	Spud Date 3-15-02

Proposed 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	1,050'	145 sx	Surface

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.

I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature: <i>Brian Wood</i>		OIL CONSERVATION DIVISION	
Printed name: Brian Wood		Approved by:	
Title: Consultant		Title:	
Date: Feb. 9, 2002		Approval Date:	Expiration Date:
Phone: (505) 466-8120		Conditions of Approval:	
		Attached <input type="checkbox"/>	

EXHIBIT A

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

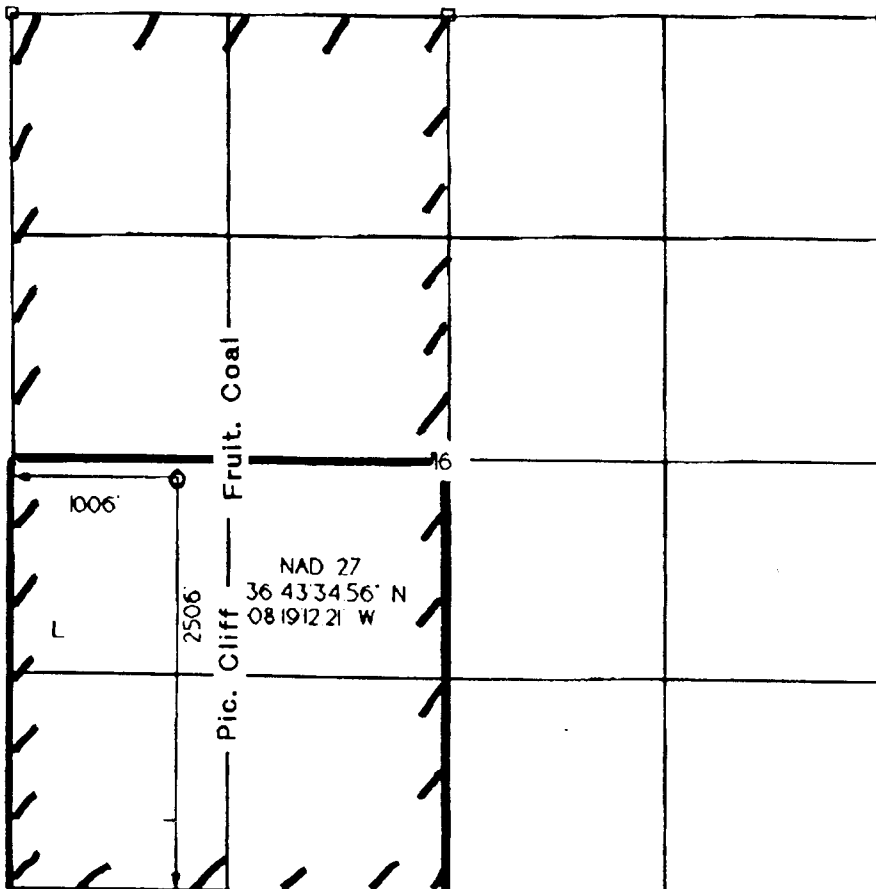
APA Number		Pool Code		Pool Name	
		71629 & 86620		FRUIT. COAL & TWIN MOUNDS PIC. CLF.	
Property Code		Property Name			Well Number
		ROPCO 16			3
OGRD No.		Operator Name			Elevation
019219		RICHARDSON OPERATING COMPANY			5175'

Surface Location									
U. or Lot	Sec.	Twp.	Rge.	Lot Id.	Feet From	North/South	Feet From	East/West	County
L	16	29 N.	14 W.		2506'	SOUTH	1006'	WEST	SAN JUAN

Bottom Hole Location if Different From Surface									
U. or Lot	Sec.	Twp.	Rge.	Lot Id.	Feet From	North/South	Feet From	East/West	County

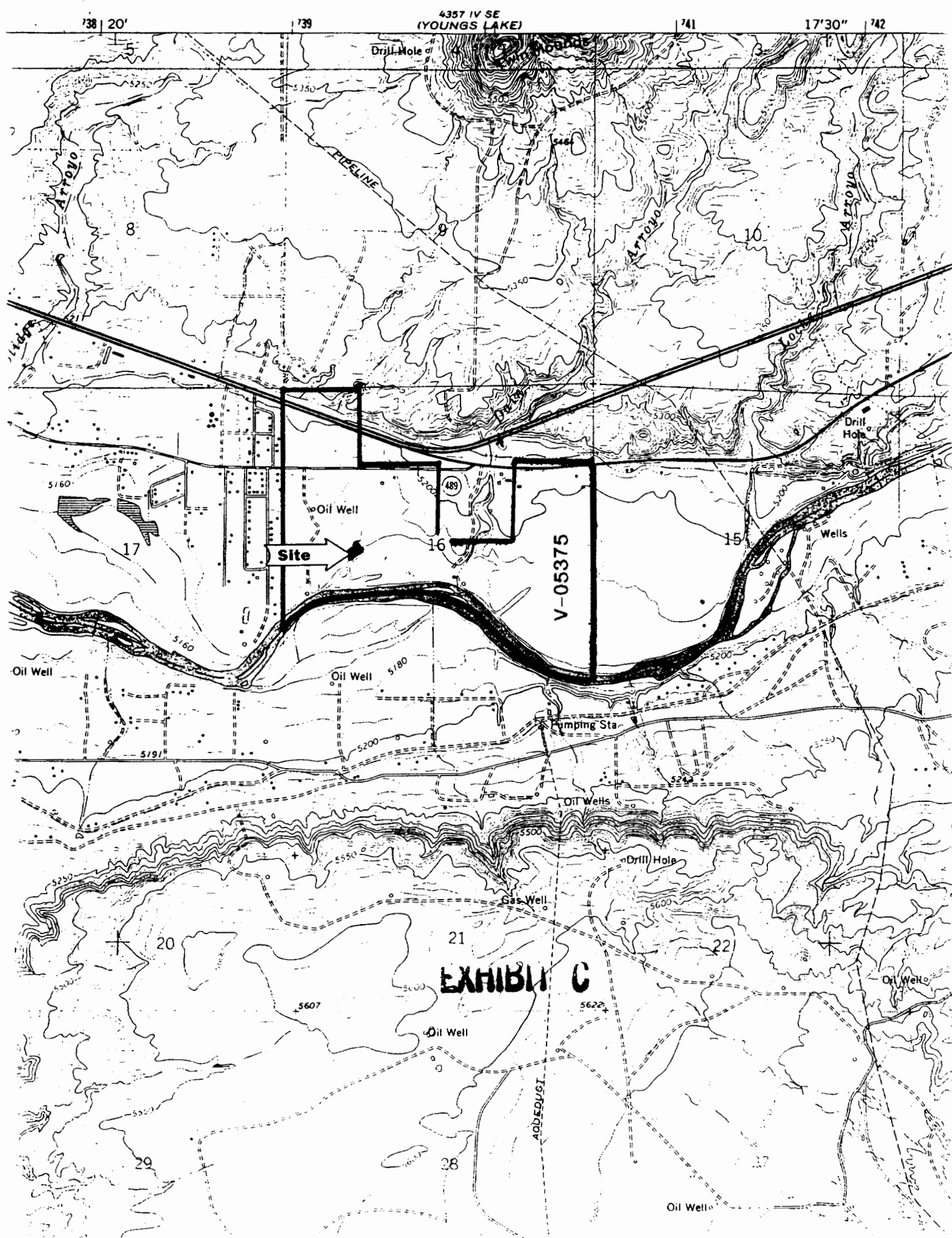
Dedication	Joint ?	Consolidation	Order No.

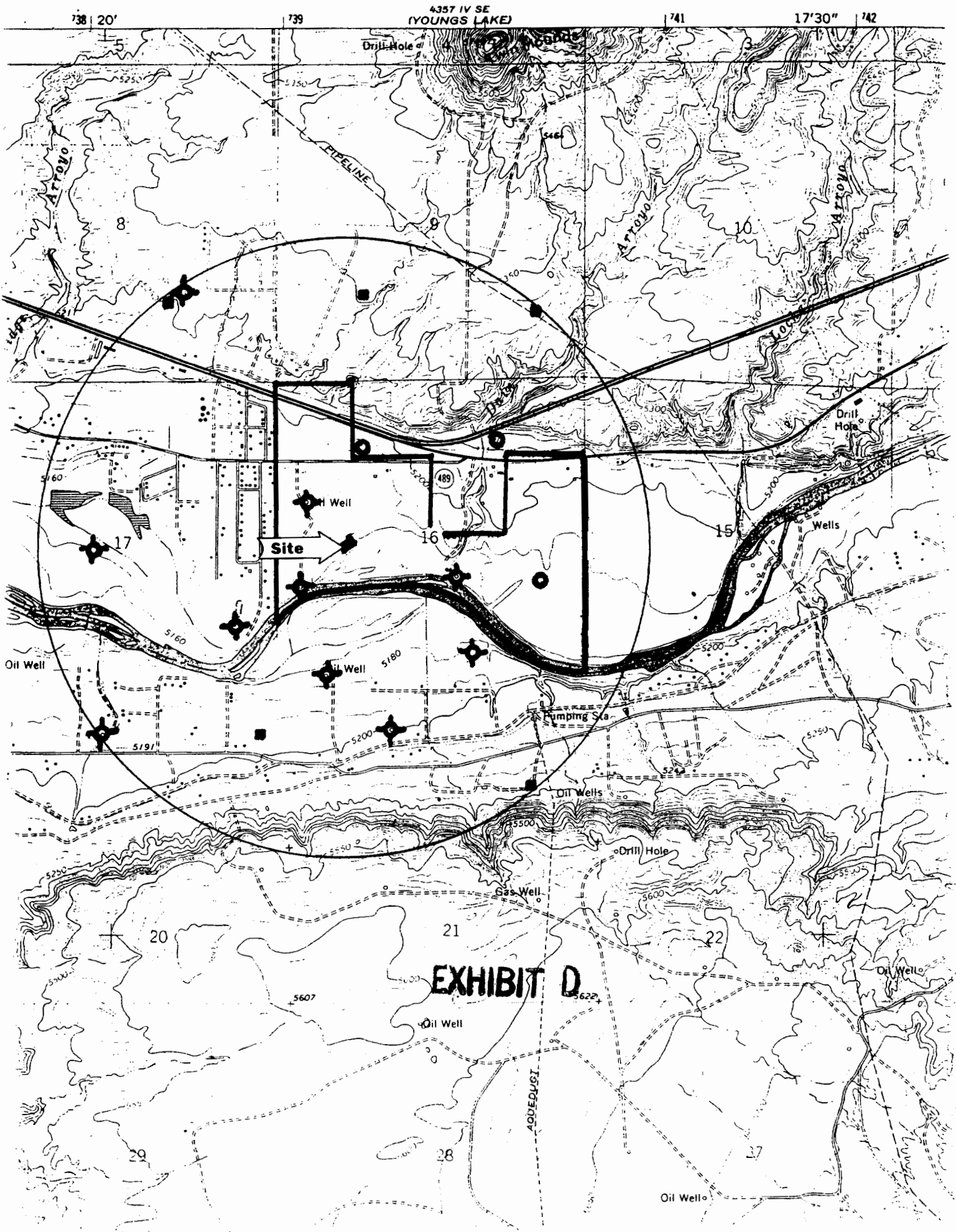
NO ALLOWABLE WILL ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief. Signature: <i>Brian Wood</i>	
Printed Name: BRIAN WOOD	
Title: CONSULTANT	
Date: FEB. 9, 2002	
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: <i>James J. McElroy</i> Professional Surveyor	

EXHIBIT B





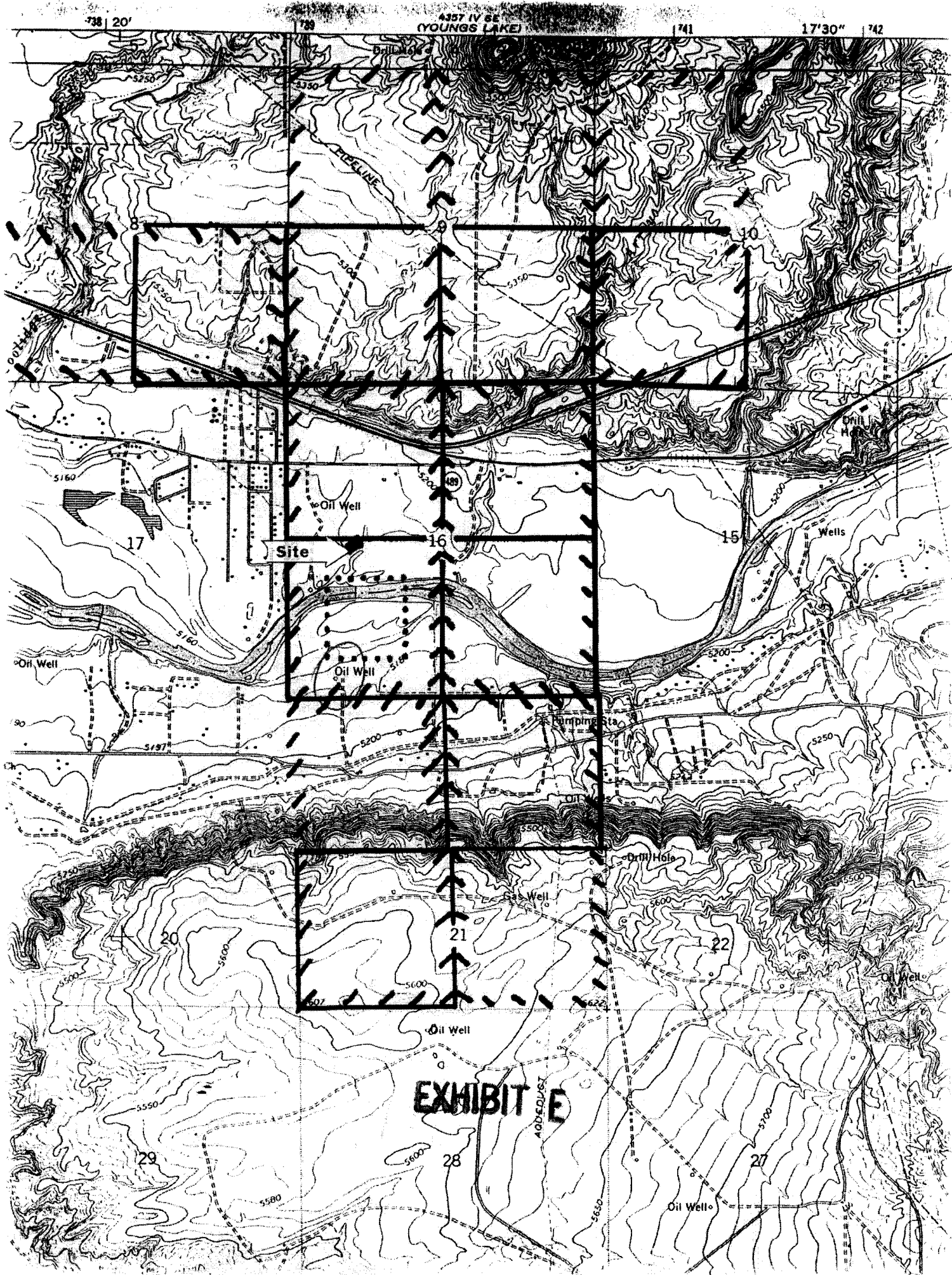


EXHIBIT E





September 9, 2002

Dr. Ray Powell
NM State Land Office
P. O. Box 1148
Santa Fe, NM 87504

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 Ropco 16 #3 gas well. The minimum distance from a gas well to a quarter section line is 660'. Due to surface conditions (San Juan River, floodplain, irrigated fields), the well is 134' from the north line of the quarter section, or 526' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 1,634' from the closest existing or proposed gas well (Richardson's Ropco 16 #2). See attached map for more details.

Well Name: Ropco 16 #3 Total Depth: 1,050'
Proposed Producing Zone: Pictured Cliffs sandstone & Fruitland coal
Acreage Dedication: Pictured Cliffs 160 acres (SW4 of Section 16)
Fruitland coal (W2 Section 16)
Location: 2506' FSL & 1006' FWL Sec. 16, T. 29 N., R. 14 W.,
San Juan County, NM on a state lease V-05375
Approximate Location: ≈1 air mile east of Kirtland, NM
Applicant Name: Richardson Operating Co. (505) 564-3100
Applicant's Address: 3100 LaPlata Highway, Farmington, NM 87401

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 87504. Their phone number is (505) 827-7131.

Please call me if you have any questions.

Sincerely,

Brian Wood



CMD :
OG5SECTONGARD
INQUIRE LAND BY SECTION09/18/02 13:26:55
OGOMES -TPSE
PAGE NO: 1

Sec : 16 Twp : 29N Rng : 14W Section Type : NORMAL

D 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	C 40.00 CS B11242 0036 EVKO DEVELOPMENT 05/26/54 A	B 40.00 CS B11242 0049 ENRON OIL & GAS C 05/26/54 A	A 40.00 CS E03555 0016 CONOCO INC 05/26/60
E 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	F 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03	G 40.00 CS E02526 0014 CHASE OIL CORPORA 03/10/59	H 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06
PF07 BKWD	PF08 FWD	PF09 PRINT	PF10 SDIV	PF11	PF12

CMD :
OG5SECTONGARD
INQUIRE LAND BY SECTION09/18/02 13:27:05
OGOMES -TPSE
PAGE NO: 2

Sec : 16 Twp : 29N Rng : 14W Section Type : NORMAL

3 33.83 CS V05375 0001 State part owner 10/01/03	2 5 25.69 44.75 CS V05375 0001 State part owner 10/01/03	1 33.89 CS V05375 0001 State part owner 10/01/03	I 40.00 CS V05375 0001 RICHARDSON PRODUC 10/01/03 A
3 4 33.83 32.30 CS V05375 0001 State part owner 10/01/03	5 44.75 Mixed Non State	6 7 35.40 28.00 CS V05375 0001 State part owner 10/01/03	6 7 35.40 28.00 CS V05375 0001 State part owner 10/01/03

PF01 HELP
PF07 BKWDPF02
PF08 FWDPF03 EXIT
PF09 PRINTPF04 GoTo
PF10 SDIVPF05
PF11PF06
PF12

CMD : ONGARD 09/18/02 13:37:57
OG6C101 C101-APPLICATION FOR PERMIT TO DRILL OGOMES -TPSE

OGRID Idn : 19219 API Well No: 30 45 30993 APD Status(A/C/P): A
Opr Name, Addr: RICHARDSON OPERATING CO Aprvl/Cncl Date : 02-11-2002
3100 LA PLATA HWY
FARMINGTON,NM 87401

Prop Idn: 29133 ROPCO 16 Well No: 2

	U/L	Sec	Township	Range	Lot	Idn	North/South	East/West
	---	---	-----	-----	-----	-----	-----	-----
Surface Locn :	C	16	29N	14W			FTG 1186 F N	FTG 1392 F W
OCD U/L :	C		API County :	45				

Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): G Cable/Rotary (C/R) : R
Lease typ(F/S/P/N/J/U/I): S Ground Level Elevation : 5190

State Lease No: Multiple Comp (S/M/C) : S
Prpsd Depth : 1050 Prpsd Frmtn : TWIN MDS PC

E0009: Enter data to modify record

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06 CONFIRM
PF07	PF08	PF09 PRINT	PF10 C102	PF11 HISTORY	PF12

Fruitland SAND

RANGE 14 West

NMPM

Extend vertical limits to include Fruitland formation and redesignate

REDESIGNATED (R-8769, 10/17/88)

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Wednesday, August 14, 2013 4:24 PM
To: Zimmerman, Cy (Cy_Zimmerman@xtoenergy.com)
Subject: Ropco 16 #3; Request to Amend NSL

Good Afternoon, Mr. Zimmerman

In this application you have requested that Order NSL-4785 be amended to provide for dedication of a S/2 unit in the Basin Fruitland Coal Gas Pool, instead of a W/2 unit. You indicate that the State Land Office is the only affected party. However, our rules require notice only to working interests owners or unleased.

Is it correct that working interest is identically owned in the Fruitland Coal in the N/2 and in the S/2 of Section 16-29N-14W? Is the State Land Office an owner of an unleased mineral interest?

Please explain the ownership situation so I can determine if any notice is required.

Sincerely

David K. Brooks

Plat of Communitized Area Covering

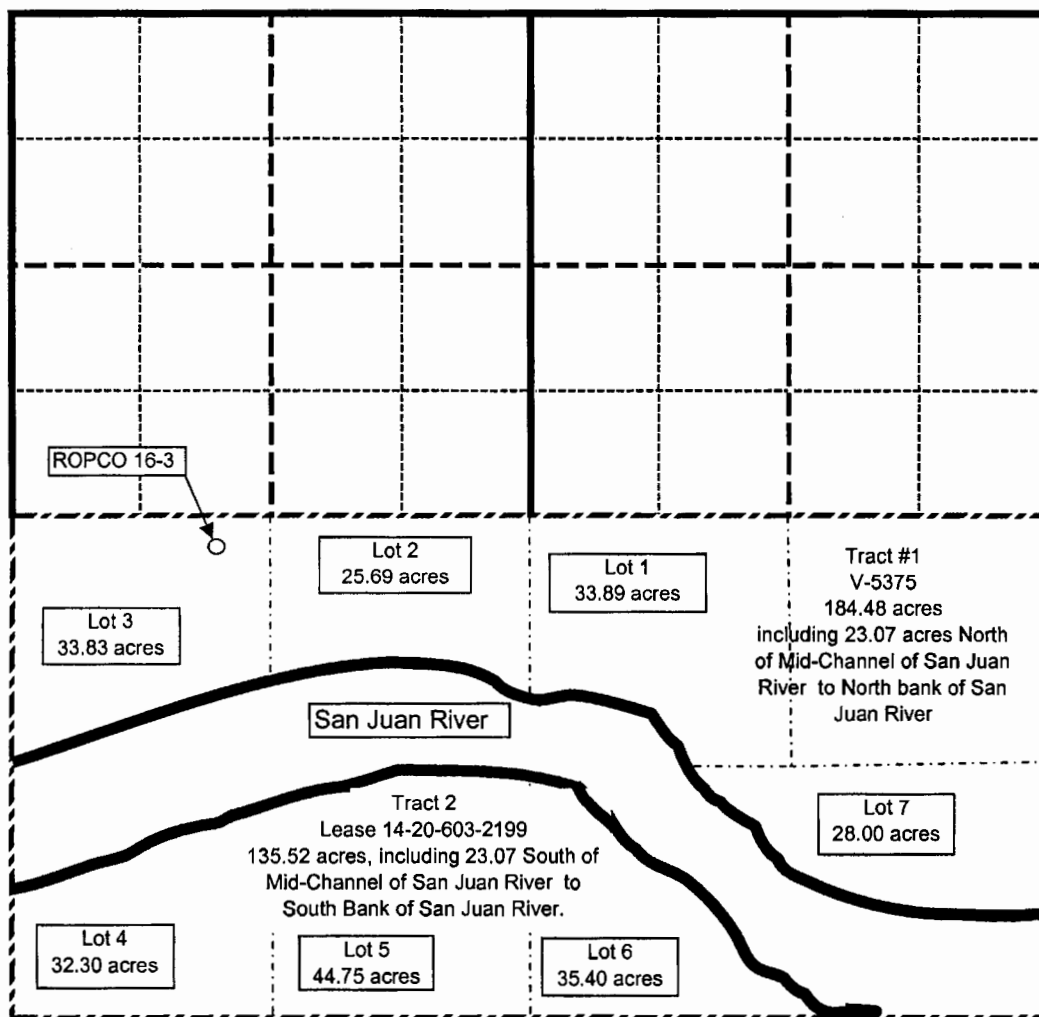
Ropco 16-3

2506' FSL & 1006' FWL Section 16, Township 29 North, Range 14 West, NMPM

S/2 Proration Unit Fruitland Coal Formation

San Juan County, New Mexico

Richardson Operating Company



Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, August 15, 2013 9:00 AM
To: 'Zimmerman, Cy'
Subject: RE: Ropco 16 #3; Request to Amend NSL

Good morning, Mr. Zimmerman

Yes, I think we would need notices to, or waivers from Chase and ConocoPhillips.

Sincerely

David K. Brooks

From: Zimmerman, Cy [mailto:Cy_Zimmerman@xtoenergy.com]
Sent: Thursday, August 15, 2013 7:26 AM
To: Brooks, David K., EMNRD
Cc: Dean, David
Subject: RE: Ropco 16 #3; Request to Amend NSL

Mr. Brooks,

Our records show that XTO has 100% WI in the S/2 and 75% WI in the N/2. The other WI owners are Chase Oil Corporation and ConocoPhillips. Our records do not show that the State Land Office has an unleased mineral interest. I was meaning that all the leases in the section are State leases, but I was mistaken that the State Office is the only affected party.

Do we need to send notice to ConocoPhillips and Chase Oil Corporation?

Thanks,

Cy Zimmerman

Associate Landman

810 Houston Street | Fort Worth, TX 76102 | ☎: (817) 885-1130 |

✉: Cy_Zimmerman@xtoenergy.com

XTO ENERGY, a subsidiary of ExxonMobil

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Wednesday, August 14, 2013 5:24 PM
To: Zimmerman, Cy
Subject: Ropco 16 #3; Request to Amend NSL

Good Afternoon, Mr. Zimmerman

In this application you have requested that Order NSL-4785 be amended to provide for dedication of a S/2 unit in the Basin Fruitland Coal Gas Pool, instead of a W/2 unit. You indicate that the State Land Office is the only affected party. However, our rules require notice only to working interests owners or unleased.

Is it correct that working interest is identically owned in the Fruitland Coal in the N/2 and in the S/2 of Section 16-29N-14W? Is the State Land Office an owner of an unleased mineral interest?

Please explain the ownership situation so I can determine if any notice is required.

Sincerely

David K. Brooks

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, August 29, 2013 8:49 AM
To: Zimmerman, Cy (Cy_Zimmerman@xtoenergy.com)
Subject: XTO - Ropco 1616 #3; NSL Application

Good morning, Mr. Zimmerman

Reference is made to my email communication (attached) dated August 15 concerning this application.

Have new notices been sent. If so, please send us copies or proof of notice pursuant to Rule 19.15.15.13.D.

Sincerely

David K. Brooks

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, August 29, 2013 8:51 AM
To: Zimmerman, Cy (Cy_Zimmerman@xtoenergy.com)
Subject: XTO Energy - Ropco 16-3; NSL Application
Attachments: RE: Ropco 16 #3; Request to Amend NSL

Attached is the email promised to be attached to my message of a few minutes ago.

Sincerely

David K. Brooks

Brooks, David K., EMNRD

From: Zimmerman, Cy <Cy_Zimmerman@xtoenergy.com>
Sent: Thursday, August 29, 2013 9:29 AM
To: Brooks, David K., EMNRD
Subject: RE: XTO - Ropco 1616 #3; NSL Application

Mr. Brooks,

I forwarded this on to David Dean who will be emailing you the copies of the waivers we sent to Chase and ConocoPhillips. He sent the waivers July 15th and we have yet to hear back from them. Once you review what we sent them, can you please advise if this will suffice as sending notice?

Thanks,

Cy Zimmerman

Associate Landman

810 Houston Street | Fort Worth, TX 76102 | ☎: (817) 885-1130 |

✉: Cy_Zimmerman@xtoenergy.com

XTO ENERGY, a subsidiary of ExxonMobil

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Thursday, August 29, 2013 9:49 AM
To: Zimmerman, Cy
Subject: XTO - Ropco 1616 #3; NSL Application

Good morning, Mr. Zimmerman

Reference is made to my email communication (attached) dated August 15 concerning this application.

Have new notices been sent. If so, please send us copies or proof of notice pursuant to Rule 19.15.15.13.D.

Sincerely

David K. Brooks

Brooks, David K., EMNRD

From: Dean, David <David_Dean@xtoenergy.com>
Sent: Thursday, August 29, 2013 2:36 PM
To: Brooks, David K., EMNRD
Cc: Zimmerman, Cy
Subject: Ropco 16 -3: NSL Application
Attachments: Firmbook Report_Ropco 16-3_NSL.pdf; Mail Receipts_Ropco 16-3_NSL.pdf; Notice to Chase Oil Corp_Ropco 16-3_NSL.pdf; Notice to COPC_Ropco 16-3_NSL.pdf; July 15 Application for NSL_Ropco_16-3.pdf

Mr. Brooks,

I am taking over Cy's San Juan area and will be handling the Ropco 16-3 NSL application from here.

Notice was sent to ConocoPhillips and Chase Oil on August 16.

Attached is proof of mailing along with the notice letters we sent. Included in our notice letter was the application Cy sent to you on July 15, 2013, along with all of the corresponding documents (see attached).

We have yet to hear back for either party. I am going to follow up them via email, and I will include the attached documents. Will this be sufficient notice?

Sincerely,

D. Jackson Dean
XTO Energy Inc., a subsidiary of ExxonMobil
810 Houston Street
Fort Worth, Texas 76102
Office: (817) 885-6676
Mobile: (682) 215-7065
Fax: (817) 885-1938
david_dean@xtoenergy.com

8/19/2013-8/19/2013 bls

Firmbook Report

Jackson Dean - Ropco 16-3, Application for Administrative Approval

7112 4369 4680 2768 6736

7112 4369 4680 2768 6743

CMN	NAME	ADDRESS		COMMENTS
7112 4369 4680 2768 6736	CHASE OIL CORPORATION	ATTN: LAND (SAN JUAN) P.O. BOX 1767	ARTESIA,NM 88211	jd-Ropco 16-3 App for Approval
7112 4369 4680 2768 6743	CONOCOPHILLIPS	ATTN: MICHELLE BLANKENSHIP LAND DEPT. SAN JUAN BUSINESS UNIT P.O. BOX 4289	FARMINGTON,NM 87499	jd-Ropco 16-3 App for Approval



August 16, 2013

VIA U. S. CERTIFIED MAIL

ATTN: Michelle Blankenship, Land Dpt.
ConocoPhillips
San Juan Business Unit
P.O. Box 4289
Farmington, NM 87499-4289

Re: Application for Administrative Approval of
Non-Standard Location-NSL 4785
XTO Energy Inc.'s Ropco 16-3
2506' FSL 1006' FWL, Section 16-29N-14W
San Juan County, New Mexico
Basin Fruitland Coal Formation

Dear Working Interest Owner:

Enclosed is a copy of an Application for Administrative Approval of Non-Standard Location for the Ropco 16-3 Well that has been sent to the New Mexico Oil Conservation Division (NMOCD) for administrative approval.

XTO Energy Inc. (XTO) has requested to amend NSL-4785 to correct the acreage from a W/2 to a S/2 spacing unit. Please see the enclosed application for more details.

It was brought to our attention that ConocoPhillips holds a working interest in the N/2 Fruitland Coal spacing unit. Therefore, the NMOCD has requested your consent. If you have no objection to the proposed non-standard location, please so indicate by signing and returning one copy of this letter to me at the address as shown at the bottom of this letter as soon as possible.

Should you have any questions or need more information, please contact me at (817) 885-6676. Your prompt attention to this matter will be very much appreciated.

Yours truly,

A handwritten signature in black ink, appearing to read 'D. Jackson Dean'.

D. Jackson Dean
Associate Landman

/cks
Enclosures

ConocoPhillips Company
Ropco 16-3 NSL-4785
August 16, 2013
Page Two

cc: Mr. David Brooks, NMOCD

ConocoPhillips Company does hereby waive notice of hearing and objection to the application by XTO Energy Inc. for the non-standard location for the Ropco 16-3, located in Section 16-29N-14W.

By: _____
Printed Name: _____
Date: _____



August 16, 2013

VIA U. S. CERTIFIED MAIL

ATN: Land (San Juan)
Chase Oil Corporation
PO BOX 1767
Artesia, NM 88211-1767

Re: Application for Administrative Approval of
Non-Standard Location-NSL 4785
XTO Energy Inc.'s Ropco 16-3
2506' FSL 1006' FWL, Section 16-29N-14W
San Juan County, New Mexico
Basin Fruitland Coal Formation

Dear Working Interest Owner:

Enclosed is a copy of an Application for Administrative Approval of Non-Standard Location for the Ropco 16-3 Well that has been sent to the New Mexico Oil Conservation Division (NMOCD) for administrative approval.

XTO Energy Inc. (XTO) has requested to amend NSL-4785 to correct the acreage from a W/2 to a S/2 spacing unit. Please see the enclosed application for more details.

It was brought to our attention that Chase Oil Corporation holds a working interest in the N/2 Fruitland Coal spacing unit. Therefore, the NMOCD has requested your consent. If you have no objection to the proposed non-standard location, please so indicate by signing and returning one copy of this letter to me at the address as shown at the bottom of this letter as soon as possible.

Should you have any questions or need more information, please contact me at (817) 885-6676. Your prompt attention to this matter will be very much appreciated.

Yours truly,

A handwritten signature in black ink, appearing to read 'D. Jackson Dean'.

D. Jackson Dean
Associate Landman

/cks

Enclosures

*Chase Oil Corporation
Ropco 16-3 NSL-4785
August 16, 2013
Page Two*

cc: Mr. David Brooks, NMOCD

Chase Oil Corporation does hereby waive notice of hearing and objection to the application by XTO Energy Inc. for the non-standard location for the Ropco 16-3, located in Section 16-29N-14W.

By: _____
Printed Name: _____
Date: _____



TLB

13 LAND-BLS

1. Article Addressed to:

CONOCOPHILLIPS
ATTN: MICHELLE BLANKENSHIP
LAND DEPT.
SAN JUAN BUSINESS UNIT
P.O. BOX 4289
FARMINGTON, NM 87403

USPS Form 3811, February 2004

2. Article Number:

(Transfer from service label)

7112 4369 4680 2768 6743

Domestic Return Receipt

11/0004-02-01-1004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

Greg Lewis

C. Date of Delivery

8/21/13

D. Is delivery address different from item 1?

YES, enter delivery address below

NO

NO

3. Service Type

Certified Mail

4. Restricted Delivery? (Check Box)

NO



TLB

13 LAND-BLS

1. Article Addressed to:

CHASE OIL CORPORATION
ATTN: LAND (SAN JUAN)
P.O. BOX 1767
ARTEZIA, NM 88211

USPS Form 3811, February 2004

2. Article Number:

(Transfer from service label)

7112 4369 4680 2768 6736

Domestic Return Receipt

11/0004-02-01-1004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

Kim Davis

C. Date of Delivery

8/21/13

D. Is delivery address different from item 1?

YES, enter delivery address below

NO

NO

3. Service Type

Certified Mail

4. Restricted Delivery? (Check Box)

NO

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, August 29, 2013 3:25 PM
To: 'Dean, David'
Subject: RE: Ropco 16 -3: NSL Application

Good Afternoon Mr. Dean

Thanks for furnishing copies of the proposed waivers sent to offsetting owners, and the return receipts from those owners.

Be advised, however, that these notifications will NOT suffice for proof of notice to these owners unless the owners sign and return them . This is because the letters do not contain the admonition required by Rule 19.15.15.13.D that any objection must be presented to OCD within 20 days.

If you receive signed waivers please furnish copies to us. Otherwise you will need to send new notices containing the required admonitions, and either furnish us copies of those letters with proof of mailing, or a statement as provided in the above-cited rule.

Sincerely

David K. Brooks
Legal Examiner

From: Dean, David [mailto:David_Dean@xtoenergy.com]
Sent: Thursday, August 29, 2013 2:36 PM
To: Brooks, David K., EMNRD
Cc: Zimmerman, Cy
Subject: Ropco 16 -3: NSL Application

Mr. Brooks,

I am taking over Cy's San Juan area and will be handling the Ropco 16-3 NSL application from here.

Notice was sent to ConocoPhillips and Chase Oil on August 16.

Attached is proof of mailing along with the notice letters we sent. Included in our notice letter was the application Cy sent to you on July 15, 2013, along with all of the corresponding documents (see attached).

We have yet to hear back for either party. I am going to follow up them via email, and I will include the attached documents. Will this be sufficient notice?

Sincerely,

D. Jackson Dean
XTO Energy Inc., a subsidiary of ExxonMobil
810 Houston Street
Fort Worth, Texas 76102
Office: (817) 885-6676

Mobile: (682) 215-7065
Fax: (817) 885-1938
david_dean@xtoenergy.com

Brooks, David K., EMNRD

From: Dean, David <David_Dean@xtoenergy.com>
Sent: Thursday, August 29, 2013 3:35 PM
To: Brooks, David K., EMNRD
Cc: Zimmerman, Cy
Subject: RE: Ropco 16 -3: NSL Application

Mr. Brooks,

I will send new notices with the required admonition if I cannot obtain their signatures in a timely manner.

Thank you,

D. Jackson Dean
Associate Landman
XTO Energy Inc.

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Thursday, August 29, 2013 4:25 PM
To: Dean, David
Subject: RE: Ropco 16 -3: NSL Application

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Legal Examiner

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810 Houston Street
Fort Worth, Texas 76102
Office: (817) 885-6676
Mobile: (682) 215-7065
Fax: (817) 885-1938
david_dean@xtoenergy.com



RECEIVED OGD

2013 SEP 20 P 1:55

September 17, 2013

VIA U. S. CERTIFIED MAIL

ATN: Mr. David K. Brooks
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87504

RE: Returned waiver letters to be included with
XTO's application to amend NSL 4785
Dated July 15, 2013

Dear Mr. Brooks:

Enclosed are the signed waiver letters from ConocoPhillips Company and Chase Oil Corporation to be included in XTO's application to amend Administrative Order NSL-4785.

Any questions may be directed to the undersigned at (817) 885-6676.

Sincerely,
XTO ENERGY INC.

A handwritten signature in black ink, appearing to read 'Jackson Dean'.


D. Jackson Dean
Associate Landman

Enclosures

Chase Oil Corporation
Ropco 16-3 NSL-4785
August 16, 2013
Page Two

cc: Mr. David Brooks, NMOCD

Chase Oil Corporation does hereby waive notice of hearing and objection to the application by XTO Energy Inc. for the non-standard location for the Ropco 16-3, located in Section 16-29N-14W.

By: 
Printed Name: _____
Date: 8/28/13

TRAVIS K. LANNING
ATTORNEY IN FACT
CHASE OIL CORPORATION

ConocoPhillips Company
Ropco 16-3 NSL-4785
August 16, 2013
Page Two

cc: Mr. David Brooks, NMOCD

ConocoPhillips Company does hereby waive notice of hearing and objection to the application by XTO Energy Inc. for the non-standard location for the Ropco 16-3, located in Section 16-29N-14W.

By: Carol Hines
Printed Name: Carol Hines
Date: 9/10/2013