

DATE IN 5/21/03	5/21/03	ENGINEER NS	LOGGED IN MV	TYPE NSL	PKR10314336512
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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



RECEIVED

ADMINISTRATIVE APPLICATION CHECKLIST

MAY 21 2003

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

OIL CONSERVATION
DIVISION

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.

Paul Lehrman

Print or Type Name

Signature

Landman

Title

5/19/03


Date

plehrman@digii.net
 e-mail Address

**REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION
FOR RICHARDSON OPERATING COMPANY
ROPCO 15 GW PC #2
476' FSL & 1800 FEL, SECTION 15, TOWNSHIP 29 NORTH, RANGE 13 WEST, NMPM, SAN
JUAN COUNTY, NEW MEXICO**

- 1) The referenced well is located on fee surface and was completed March 6, 1997, in the Pictured Cliffs formation. The location was chosen due to proximity to occupied residential and commercial real estate within the city limits of Farmington, New Mexico. The location is approximately 184' too close to the south line of Section 15. Richardson proposes to use the existing wellbore and well pad to complete this well in the Fruitland Coal formation. Richardson controls the Fruitland Coal rights in the E/2 of Section 15.
- 2) A C-102 and C-103 (Exhibit "A") is attached showing the well location and the proration unit for the proposed Fruitland Coal re-completion. Application for adding the Fruitland Coal pursuant to Order No. R-8768-C (71629) was submitted on December 17, 2002 and was approved by the Oil Conservation Division on December 17, 2002.
- 3) A map (Exhibit "B") is attached showing the adjoining spacing units and existing Fruitland Coal wells.
- 4) Certified letters have been sent to offsetting operators to notify them of our intentions. Copies of the letters are attached to this application.
- 5) Existing land use concerns and the fact that the existing location exists force a non-standard location exception for this action. It would not be feasible to build a separate legal location to drill a separate Fruitland Coal well.
- 6) Archaeology and topography are not issues with this well.
- 7) Directional drilling is not feasible for such a shallow completion.
- 8) A non-standard location is requested because of surface conditions, i. e., existing occupied dwellings, apartment buildings, streets and commercial real estate in the City of Farmington, New Mexico.
- 9) I hereby certify that notice was sent to the following offset operators, leaseholders or Surface Owners which adjoin the applicant's spacing unit.

Merrion Oil and Gas Corp.
HEC Petroleum, Inc.
BP America Production Company
Calpine Natural Gas Co., LP
Herd Partners, Ltd.
Manon Markham McMullan
Rod Markham
Christmann Minerals Company
Diamond Head Properties, LP



Paul Lehrman
Richardson Operating Company
May 19, 2003

Submit 3 Copies To Appropriate District
Office
District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Ave., Artesia, NM 88210
District III
1000 Rio Brazos Rd., 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-103
Revised March 25, 1999

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)		WELL API NO. 30-045-29383
1. Type of Well: Oil Well <input type="checkbox"/> Gas Well <input checked="" type="checkbox"/> Other		5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
2. Name of Operator Richardson Operating Company		6. State Oil & Gas Lease No.
3. Address of Operator 3100 La Plata Highway Farmington, NM 87401		7. Lease Name or Unit Agreement Name: Ropco 15 GW PC
4. Well Location Unit Letter <u>O</u> : <u>476</u> feet from the <u>South</u> line <u>3</u> line <u>1800</u> feet from the <u>East</u> line Section <u>15</u> Township <u>29N</u> Range <u>13W</u> NMPM County <u>San Juan</u>		7. Well No. #2
10. Elevation (Show whether DR, RKB, RT, GR, etc.) 5322' GR		9. Pool name or Wildcat Basin Fruitland Coal

11. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:
PERFORM REMEDIAL WORK ☐ PLUG AND ABANDON ☐
TEMPORARILY ABANDON ☐ CHANGE PLANS ☐
PULL OR ALTER CASING ☐ MULTIPLE COMPLETION ☐

SUBSEQUENT REPORT OF:
REMEDIAL WORK ☐ ALTERING CASING ☐
COMMENCE DRILLING OPNS. ☐ PLUG AND ABANDONMENT ☐
CASING TEST AND CEMENT JOB ☐
OTHER: ☐

OTHER: Propose adding zone: Basin Fruitland Coal (71629)

12. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.

Richardson Operating Company proposes adding the Basin Fruitland Coal (71629) pursuant to Order No. R-8768-C.

Please find the attached plats for both the subject well (Ropco 15 #2) and the original Basin Fruitland Coal well in this spacing unit (Ropco 15 #1). The Basin Fruitland Coal allocation is defined by the dark outlined area on both plats.

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

SIGNATURE Drew Carnes TITLE Operations Manager DATE 12-17-02

Type or print name Drew Carnes

Telephone No. 505-564-3100

(This space for State use)

DEPUTY OIL & GAS INSPECTOR, DIST. #3

APPROVED BY [Signature] TITLE

DATE DEC 17 2002

Conditions of approval, if any:

HOLD C104 FOR NSL Fruitland coal

Revised February 21, 1994

Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

DISTRICT II
P.O. Drawer DD, Artesia, N.M. 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Artesia, N.M. 87410

DISTRICT IV
P.O. Box 2088, Santa Fe, NM 87504-2088

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, NM 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

'API Number 30-045-2383	'Pool Code 71629/79680	'Pool Name Basin Fruitland Coal / West Kutz Pictured Cliff
'Property Code 19023	'Property Name ROPCO 15 GW PC	'Well Number No. 2
'OGED No. 19219	'Operator Name RICHARDSON OPERATING	'Elevation 5322

10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	15	T-29-N	R-13-W		476	SOUTH	1800	EAST	SAN JUAN

11 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

'Dedicated Acres 320/160	'Joint or Infill N	'Consolidation Code P	'Order No.
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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

<p>16 S 89-54 E</p> <p>RECEIVED AUG - 9 1996</p> <p>OIL CON. DIV. DIST. 3</p> <p>Fd. R.R. SPIKE IN STREET</p>	<p>Various Leases (See Attached)</p> <p>271' FNL</p> <p>Existing ROPCO 15 GWA PC B EC</p> <p>775' FEL</p> <p>Fd. MAIL IN ROAD</p> <p>ROPCO 15 GW PC No. 2</p> <p>1800'</p> <p>476'</p> <p>S 89-24-58 W 2655'</p>	<p>17 OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Bruce E. Delventhal</i> Signature Bruce E. Delventhal Printed Name Agent Title June 18, 1996 Date</p> <p>18 SURVEYOR CERTIFICATION</p> <p>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.</p> <p>JUNE 14, 1996 Date of Survey <i>[Signature]</i> Signature and Seal 8834 Richardson Professional Land Surveyor Certificate Number</p>
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Exhibit "B"
Farmington South Quad
For Richardson Operating NSL Application
Section 15, T29N,R13W, NMPM, San Juan Co., NM
ROPCO 15 GW PC No.2

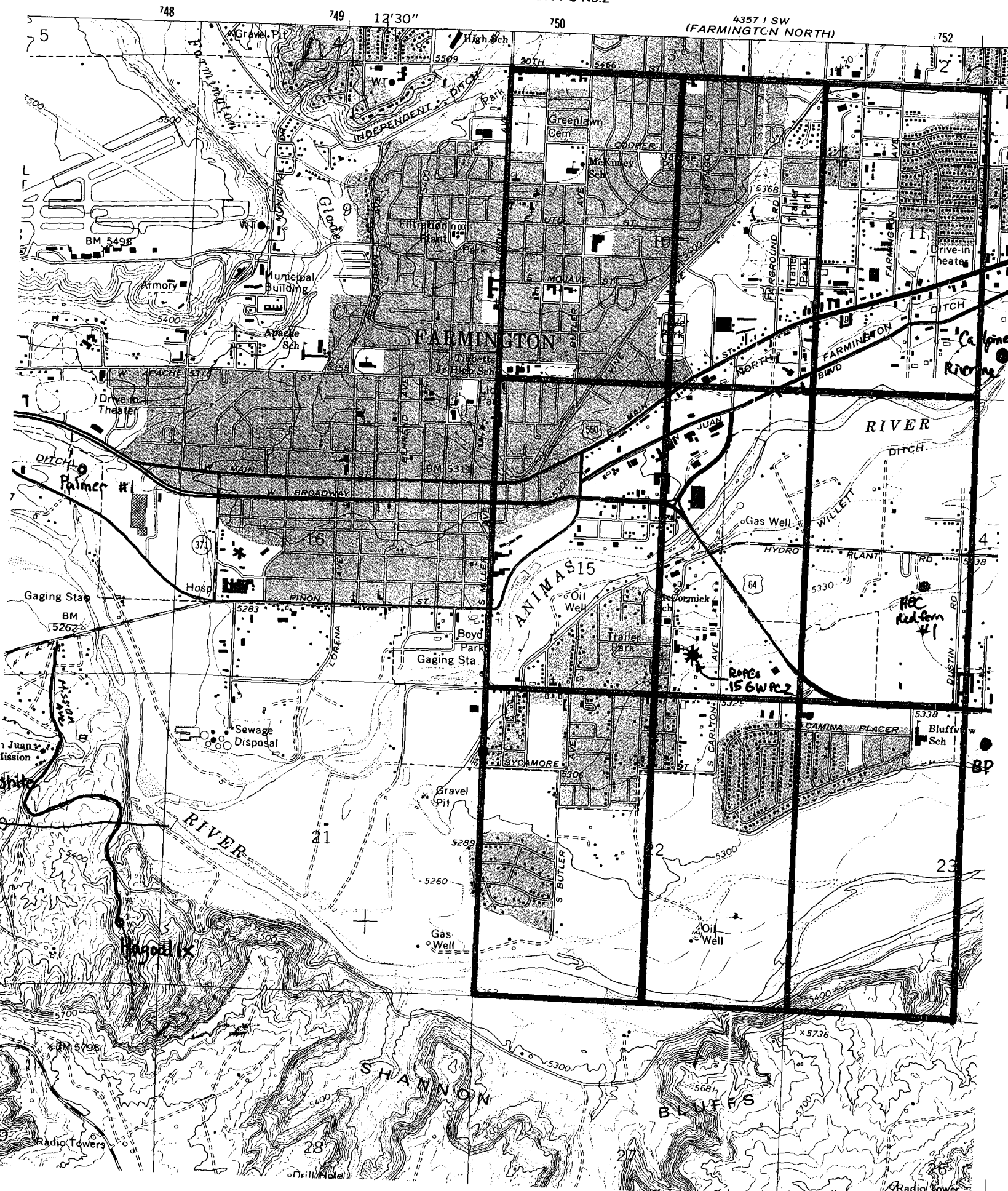
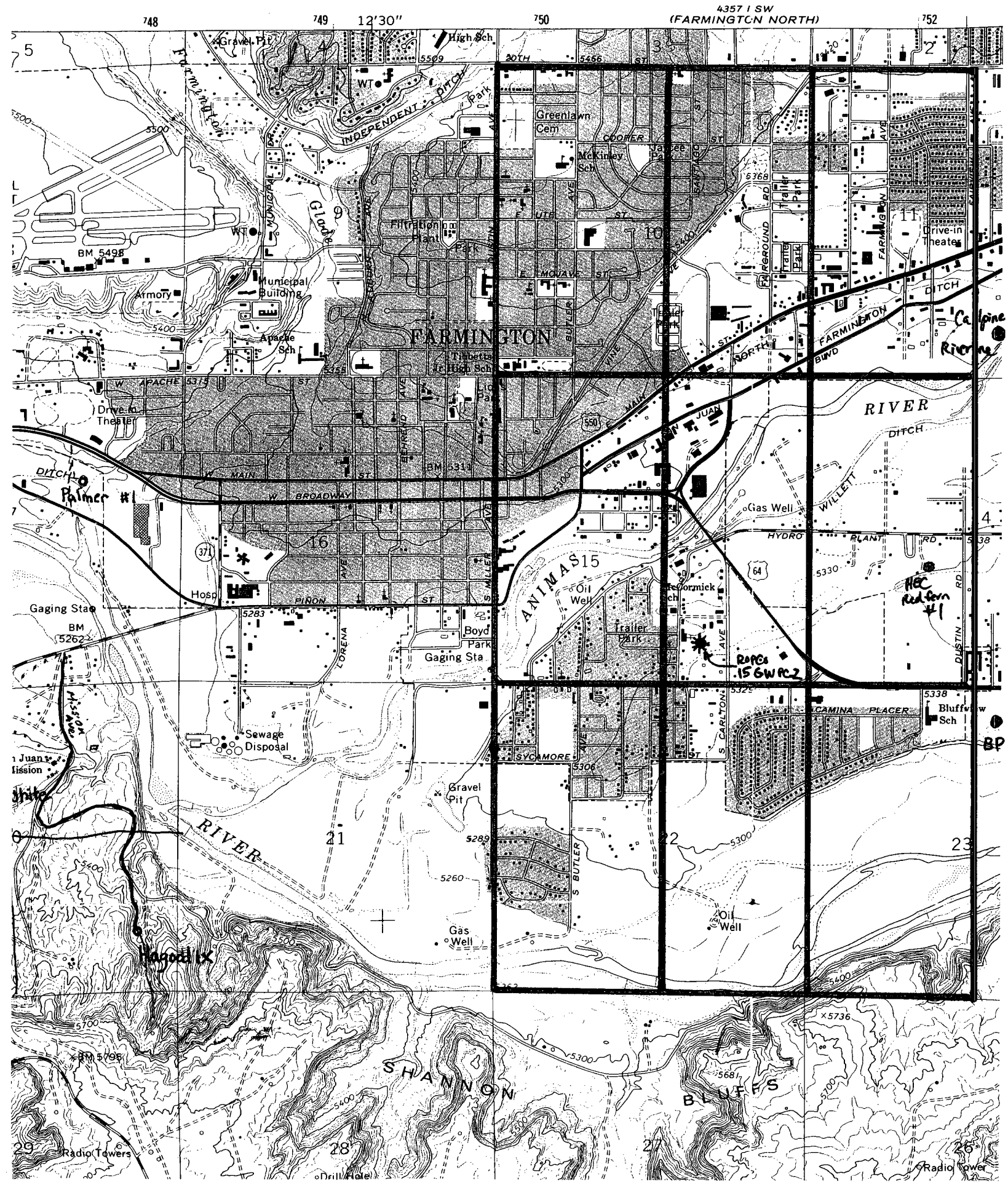


Exhibit "B"
Farmington South Quad
For Richardson Operating NSL Application
Section 15, T29N,R13W, NMPM, San Juan Co., NM
ROPCO 15 GW PC No.2



RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7929

Merrion Oil and Gas Corp.
610 Reilly Ave.
Farmington, New Mexico 87401

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Gentlemen:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

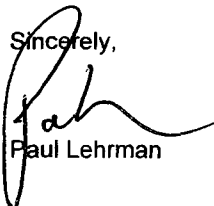
Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-3100 (Contact Paul Lehrman)

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,



Paul Lehrman

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature X</p> <p style="text-align: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p style="text-align: center;">Merrion Oil & Gas Corp. 610 Reilly Ave. Farmington, NM 87401</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p style="text-align: center;">7002 3150 0002 0906 7929</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service-Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985



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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To	
Merrion Oil & Gas Corp.	
Street, Apt. No., or PO Box No. 610 Reilly Ave	
City, State, ZIP+4 Farmington, NM 87401	
PS Form 3800, June 2002	
See Reverse for Instructions	

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7936

HEC Petroleum, Inc.
4610 S. Ulster St., Suite 200
Denver, CO 80237

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Gentlemen:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

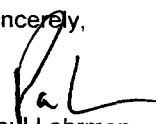
Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,


Paul Lehrman

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL™

7936 0906 0002 3150 0002 0906 7936

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OFFICIAL USE	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$	Postmark Here
Sent To <u>HEC Petroleum, Inc.</u> Street, Apt. No., or PO Box No. <u>4610 S. Ulster St., Ste 200</u> City, State, ZIP+4 <u>Denver, Co 80237</u>	
PS Form 3800, June 2002 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: <u>HEC Petroleum, Inc.</u> <u>4610 S. Ulster St., Ste 200</u> <u>Denver, Co 80237</u>	B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? <input type="checkbox"/> Yes if YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number (Transfer from service label)	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	7002 3150 0002 0906 7936

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7943

BP America Production Co.
Attn: Brett Woody
501 Westlake Blvd., WL1 Room 19.104
Houston, TX 77079

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Dear Mr. Woody:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

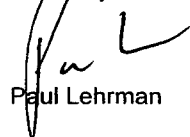
Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,



Paul Lehrman

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BP America Production Company
 attn: Brett Woody
 501 Westlake Blvd.
 WLI, Rm 19.104
 Houston, TX 77079

2. Article Number

(Transfer from service label)

7002 3150 0002 0906 7943

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1?** ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

- ☐ Yes

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985



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 7002 3150 0002 0906 7943

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BP America Prod. Co. attn: Brett Woody
 Street, Apt. No.,
 or PO Box No. 501 Westlake Blvd, WLI, Rm 19.104
 City, State, ZIP+4 Houston, TX 77079

PS Form 3800, June 2002

See Reverse for Instructions

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7950

Calpine Natural Gas Company LP
Attn: Jerry Sullivan
1200 17th St., Suite 770
Denver, CO 80202

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Dear Mr. Sullivan:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

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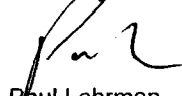
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Proposed Producing Zone:	Fruitland Coal
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Applicant's Phone No.	505/564-8115

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Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,



Paul Lehrman

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

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7002 3150 0002 0906 7950

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 Street, Apt. No.,
 or PO Box No. 1200 17th St, Ste 770
 City, State, ZIP+4 Denver, CO 80202

PS Form 3800, June 2002 See Reverse for Instructions

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1. Article Addressed to:

Calpine Natural Gas Co.
attn: Jerry Sullivan
1200 17th St, Ste 770
Denver, CO 80202

2. Article Number
(Transfer from service label)

7002 3150 0002 0906 7950

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X ☐ Addressee

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RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 8001

Herd Partners Ltd.
P.O. Box 130
Midland, TX 79702

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Gentlemen:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,

Paul Lehrman

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
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7002 3150 0002 0906 8001

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Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <i>Herd Partners Ltd</i>	
Street, Apt. No., or PO Box No. <i>Box 130</i>	
City, State, ZIP+4 <i>Midland, TX 79702</i>	
PS Form 3800, June 2002 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee X</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p><i>Herd Partners Ltd</i> <i>Box 130</i> <i>Midland, TX 79702</i></p>	<p>3. Service-Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7002 3150 0002 0906 8001</p>

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7998

Ms. Manon Markham McMullan
2200 Berkeley
Wichita Falls, TX 76308

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Dear Ms. McMullan:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

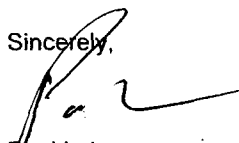
Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,



Paul Lehrman

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Manon Markham McMullan
2200 Berkeley
Wichita Falls, TX
76308

2. Article Number
(Transfer from service label)

7002 3150 0002 0906 7998

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
if YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985

PS Form 3800, June 2002

See Reverse for Instructions

Sent To: Manon Markham McMullan
Street, Apt. No.:
or PO Box No.: 2200 Berkeley
City, State, ZIP+4: Wichita Falls, TX 76308

Postage	\$
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RICHARDSON PRODUCTION COMPANY

501 Airport Drive, Suite 119

Phone (505) 564-8115

FARMINGTON, NM 87401

FAX (505) 564-8334

May 19, 2003

Certified Mail

Return Receipt Requested

Article No. 7002 3150 0002 0906 7981

Mr. Rod Markham
1500 Broadway, Suite 1212
Lubbock, TX 78401

RE: Non-Standard Location Application
Proposed Fruitland Re-Completion
Richardson ROPCO 15 GW PC No. 2
Township 29 North, Range 13 West, NMPM
476' FSL & 1800 FEL
Section 15: SE/4
San Juan County, New Mexico

Dear Mr. Markham:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

Richardson Operating Company is applying to the NMOCD for a re-completion of its existing ROPCO 15 GW PC No. 2 well in the Fruitland Coal formation. The minimum distance from quarter section lines required by NMOCD rules is 660'. Due to existing surface conditions (existing location), the well is approximately 476' from the south line of Section 15.

Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,


Paul Lehrman

7002 3150 0002 0906 7981

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

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Total Postage & Fees	\$
Sent To <i>Rod Markham</i> Street, Apt. No., or PO Box No. <i>1500 Broadway, Ste 1212</i> City, State, ZIP+4 <i>Lubbock, TX 79401</i>	
PS Form 3800, June 2002 See Reverse for Instructions	

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Rod Markham
1500 Broadway, Ste 1212
Lubbock, TX 79401

2. Article Number
 (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent
☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7974

Christmann Minerals Co.
Box 66
Pinedale, WY 82941

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Gentlemen:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

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Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,


Paul Lehrman

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Christmann Minerals Co.
P.O. Box 66
Pinedale, WY
82941

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
if YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985

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(Endorsement Required)

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Sent To

Christmann Minerals Co.

Street, Apt. No.,
or PO Box No.

P.O. Box 66

City, State, ZIP+4

Pinedale, WY 82941

PS Form 3800, June 2002

See Reverse for Instructions

RICHARDSON PRODUCTION COMPANY
501 Airport Drive, Suite 119
Phone (505) 564-8115 FARMINGTON, NM 87401 FAX (505) 564-8334

May 19, 2003

Certified Mail
Return Receipt Requested
Article No. 7002 3150 0002 0906 7967

Diamond Head Properties LP
Box 2127
Midland, TX 79702

RE: Non-Standard Location Application
 Proposed Fruitland Re-Completion
 Richardson ROPCO 15 GW PC No. 2
 Township 29 North, Range 13 West, NMPM
 476' FSL & 1800 FEL
 Section 15: SE/4
 San Juan County, New Mexico

Gentlemen:

As required by New Mexico Oil Conservation Division (NMOCD) Rules, this letter will serve to notify you of the following non-standard location application for a well. This letter is a notice only. No action is required on your part unless you have questions or objections. Any objections must be filed in writing within 20 days of receipt of the application by the NMOCD.

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Well Name:	ROPCO 15 GW PC No. 2
Proposed Producing Zone:	Fruitland Coal
Acreage Dedication:	E/2 of Section 15, T29N, R13W, NMPM, San Juan Co., NM
Location:	476' FSL & 1800 FEL, Section 15, T29N, R13W, NMPM, San Juan Co., NM
Applicant's Name:	Richardson Operating Company
Applicant's Address:	3100 La Plata Highway, Farmington, New Mexico 87401
Applicant's Phone No.	505/564-8115

Submittal Information: Application for a non-standard location will be filed with the NMOCD. If they determine the application complies with the regulations, it will be approved. Any questions can be submitted to the New Mexico Oil Conservation Division, whose address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Their phone number is 505/476-3440.

Thank you for your consideration in this matter.

Please call me at 505/564-8115 (Richardson's Land Office) if you have any questions.

Sincerely,



Paul Lehrman

7002 3150 0002 0906 7967

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Total Postage & Fees	\$

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Sent To Diamond Head Properties LP
 Street, Apt. No.,
 or PO Box No. P.O. Box 2127
 City, State, ZIP+4 Midland, TX 79702

PS Form 3800, June 2002

See Reverse for Instructions

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Diamond Head Properties, LP
P.O. Box 2127
Midland, TX 79702

2. Article Number
(Transfer from service label)

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent
☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
- ☐ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt

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