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	NEW MEXICO OIL CON - Engineerir		West Largo Federal 13 5634
	1220 South St. Francis Dr	5	Federal IS
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T CHECKLISTIS	MANDATORY FOR ALL ADMINISTRATIV	E APPLICATIONS FOR EXCEPTIONS	TO DIVISION RULES AND REGULATIONS
[DHC-Dov PC-P]	ns: andard Location] [NSP-Non-St vnhole Commingling] [CTB-L ool Commingling] [OLS - Off [WFX-Waterflood Expansion]	ease Commingling] [PLC-F -Lease Storage] [OLM-Off-I [PMX-Pressure Maintenan al] [IPI-Injection Pressure I	imultaneous Dedication] Pool/Lease Commingling] Lease Measurement] ce Expansion] ncrease]
	PPLICATION - Check Those Location - Spacing Unit - Sin	Which Apply for [A]	· •
Chec [B]	k One Only for [B] or [C] Commingling - Storage - Me DHC CTB	asurement PLC PC OLS	OLM
[C]	Injection - Disposal - Pressur	re Increase - Enhanced Oil Rec SWD IPI EOR	covery PPR
[1)]	Other: Specify		
2] NOTIFICAT [A]	TON REQUIRED TO: - Chec	k Those Which Apply, or Derriding Royalty Interest Own	
[B]	Offset Operators, Leasel	holders or Surface Owner	
[C]	Application is One Whi	ch Requires Published Legal N	sotice
[[]]	Notification and/or Cont J 5 Bureau of Land Management - C	current Approval by BLM or S Commissioner of Public Lands, State Land Offi	SLO
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	CURATE AND COMPLETE ATION INDICATED ABOVE		ED TO PROCESS THE TYPE
nd di accurate a		nowledge. Talso understand	nis application for administrative that <b>no action</b> will be taken on this ston.

Rbert E. Fielder		···· · ··· ··· ·
Property Mgmt& Consulting	4.11.0	: 13 -2
Box 2596	e-mari (Adaress	
Farmington 87499		

## **PROPERTY MANAGEMENT & CONSULTING, INC.**

P. O. BOX 2596 FARMINGTON, NEW MEXICO 87499-2596 (505) 325-5220 2017 PAY 7 RM 11 38

May 2, 2007

New Mexico Energy, Minerals and Natural Resources Dept. Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505 Attn: Mr. David Brooks

Re: Unorthodox Location, Administrative Approval Request West Largo Corp.
Federal 15 No. 1
Basin Fruitland Coal
1985' FNL and 2385' FWL, Sec 15, T28N, R9W, NMPM San Juan County, New Mexico

Dear Mr. Brooks:

West Largo Corp. respectfully requests that an unorthodox location be administratively approved for the Federal 15 No. 1 well in accordance with the terms of Rule 104.F(2). Attachments included with this letter include a C-102 showing the proposed unorthodox location and all the Basin Fruitland Coal wells and spacing units in Section 15, a topographic map of the section, a list of the working interest owners in the affected spacing unit in the east half of Section 15 and a letter from West Largo Corp. certifying the working interest ownership is the same in both the east half and west half spacing units.

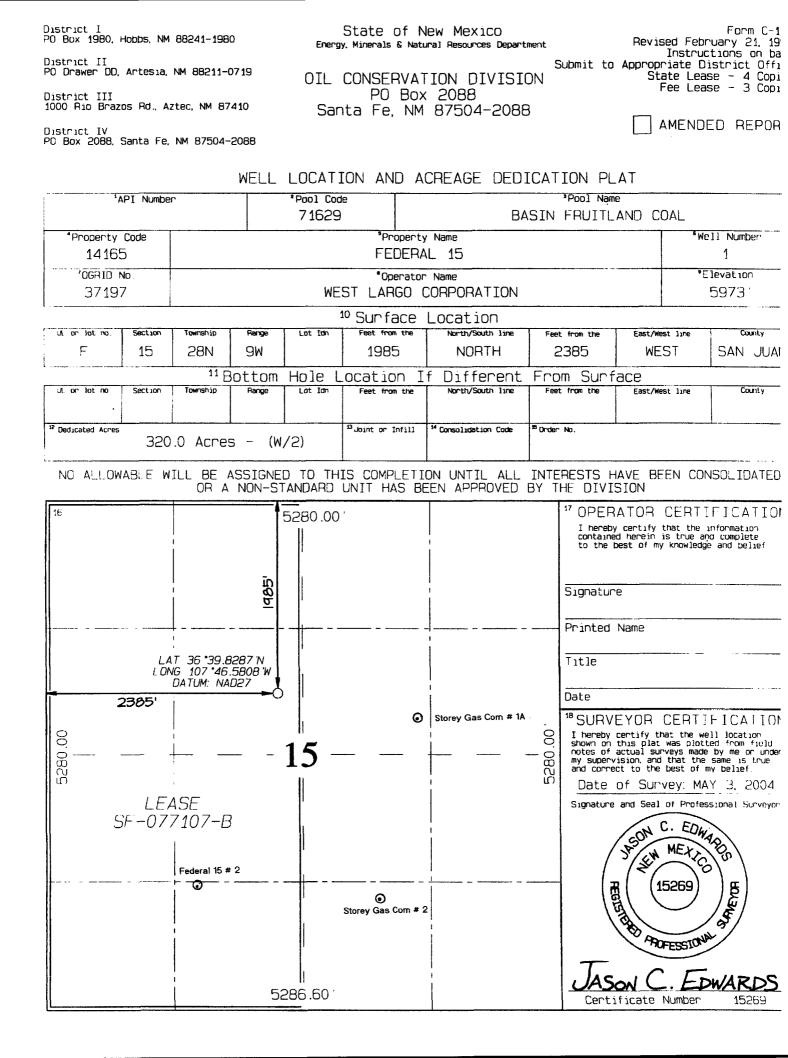
The proposed location is unorthodox to the interior half section line of Section 15. The east half of Section 15 has two existing Fruitland Coal wells operated by West Largo Corp. The proposed location is situated in the bottom of an unnamed drainage at the base of the north slope of Harris Mesa. This proposed site was picked due to topographic and archeology problems associated with three other legal sites extensively investigated. These sites are referenced on the attached topographic map. Site No. 1 is located in a major runoff drainage of Harris Mesa and would be a perpetual hazard due to falling rocks and flooding. Site No. 2 is located in the bottom of the canyon but is bisected by several drainages of Harris Mesa and would be subject to flooding issues also. Site No. 3 (under Proposed Location wording on map) will have some flooding issues and the access would have to pass archeological sites (rock art) coming from existing access roads. All other potential sites in the staking window are located on the slope of Harris Mesa and would present topographical problems with both the road and location. Site No. 4 was picked at the spot where there was enough distance between an existing pipeline right of way and road to layout a location.

Working interest ownership in the Basin Fruitland Coal wells in both spacing units in this section is identical. It is our understanding that Rule 1210.A(2)(b) does not require any notification when this condition exists. The operator of both spacing units, West Largo Corp., was involved in the decision to locate this well at the proposed spot. The closest Fruitland Coal well is approximately 1440 feet away from the proposed location.

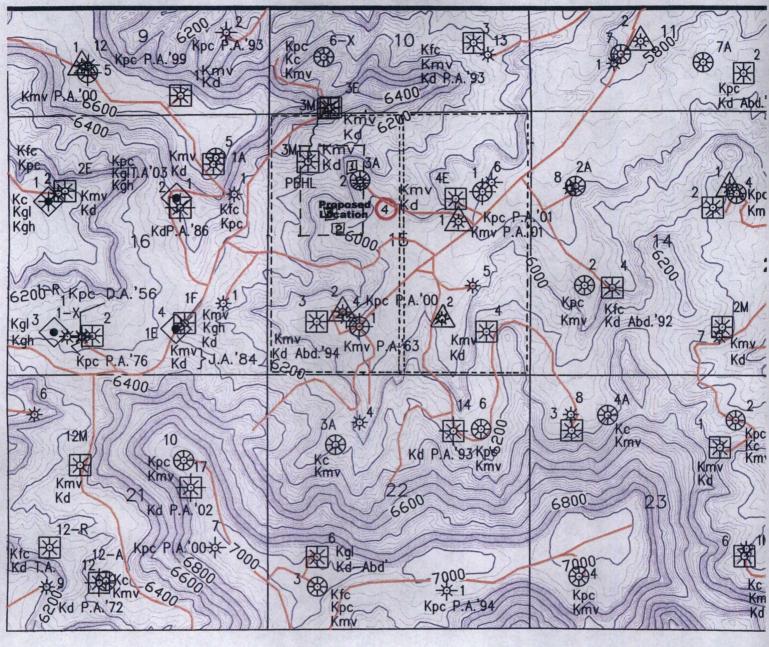
Please contact me at 505.320.1435 if you have any questions.

Sincerely, chut E. Till

Robert E. Fielder Agent for West Largo Corp.



R - 9 - W

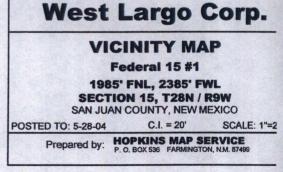


Spacing unit boundary

- Staking window

X

Other sites investigated



## West Largo Corp. Working Interest Owner List

## Storey Gas Com "A" Federal 15

E/2 Sec.15 T28N-R9W W/2 Sec.15 T28N-R9W

Owner Name/ Address	Working Interest
ConocoPhillips Company	30.000000%
P.O. Box 2197	
Houston, TX 77252-2197	
Attn: Brad A. Baker	
San Juan Properties, Inc.	30.7125000%
P.O. Box 4304	
Horseshoe Bay, TX 78657-4304	
Attn: William Wines	
Garrett Petroleum, Inc.	23.0125000%
8801 S. Yale, Suite 240	
Tulsa, OK 74137-3535	
Attn: J.P. Garrett	
Jerry D. McElroy Living Trust	6.2125000%
Jerry D. McElroy, Trustee	
3209 S. Topeka Ave.	
Topeka, KS 66611	
Attn: Bruce Anderson	
Amanda Jane Partners, L.P.	3.1500000%
P.O. Box 465	
Norton, KS 67654	
Attn: Amanda J. Kelling	
Belinda McPherson	1.7062500%
3501 SW Fairlawn Road, Suite 100	
Topeka, KS 66614-3928	
Bruce M. McPherson	0.8531250%
3501 SW Fairlawn Road, Suite 100	
Topeka, KS 66614-3928	
Duane L. Fager Trust	0.8531250%
3320 SW Spring Creek Place	
Topeka, KS 66614	
GMO 253 Corporation	3.0625000%
5301 Lincolnshire Circle	
Topeka, KS 66610	l l
Attn: Greg Owen	
Laura Owen	0.4375000%
7032 W. Arlington Drive	
Littleton, CO 80123	
Total Working Interest	100.000000%

May 3, 2007

Re: Application for Permit to Drill: Federal 15 #1 – SENW Sec. 15-T28N-R9W Non Standard Location

West Largo Corp., by the terms of the U.S. Department of the Interior Bureau of Land Management Transfer of Operating Rights in a Lease for Oil & Gas dated September 1, 1991 (and other subsequent documents) is the designated Operator for Federal Leases NMSF-077107-B and NM-86301 in Section 15-T28N-R9W, NMPM, in San Juan County, New Mexico. These operating rights apply from the surface to the base of the Fruitland Coal.

As President of West Largo Corp., I hereby certify that the Working Interest Ownership in the Federal 15 lease (W/2 15-28N-9W) and the adjacent Storey Gas Com "A" lease (E/2 15-28N-9W) is completely consistent and identical. A list of the Working Interest Owners in these leases are attached.

Sincerely,

J.P. Garrett President, West Largo Corp.

attachment

## Well File Search - Select API Number to View

Please select the API Number you wish to view from the list below by clicking the radio button next to the API Number. Then click the "Continue" button to see the thumbnails for the API you selected. The search results are broken out by groups of 25 on each page. Switching pages can be done by clicking the "Next 25" or "Previous 25" links.

2 Records found		Displaying Screen 1 of 1					
$\bigcirc$	API Number 3004507493	ULSTR F-15-28N-9W		Footages 1453 FNL & 1850 FWL			
	Well Name & Number: MICHENER LS No. 002 Operator: CONOCOPHILLIPS COMPANY						
0	3004529339 F-15-28N-9W 1390 FNL & 1840 FWL Well Name & Number: MICHENER LS No. 003A Operator: CONOCOPHILLIPS COMPANY						
	Operator. CONOCOL TIL						

Continue Go Back