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RICHARDSON OPERATING COMPANY

1760 Lincoin, Suite 1700 Denver, Calarado 80203 (303) 830-8000 FAX (303) 830-8009

August 17, 2001

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re: Application for Authorization to Inject San Juan County, New Mexico

Gentlemen:

Richardson Operating Company is requesting administrative approval for salt water disposal into the Salty Dog No. 2 well. This well is not yet drilled, but is scheduled to spud near the end of August. The well will be completed in the Blanco Mesaverde field, and will be located in the NW/4SE/4 of Section 5, Township 29 North, Range 14 West, San Juan County, New Mexico. Richardson owns the surface and 100% leasehold interest, surface to base of Pictured Cliffs formation. Conoco Inc. owns 100% leasehold interest below the base of the Pictured Cliffs formation.

Enclosed are two copies of Application for Authorization to Inject (Form C-108). An additional copy has been forwarded to the District Office in Aztec.

There is only one well which penetrates the proposed injection zone within one half mile of the Salty Dog No. 2 location. The plugged and abandoned Pubco-Carr Russell Federal No. 1 well is located in the NE/4NE/4 of Section 8, T29N, R14W. Pertinent well records are attached as Exhibit 2.

Information from the State Engineer's Office in Aztec indicates there are no shallow fresh water wells within one mile of the Salty Dog No. 2 location.

If you have any questions or if you need additional information. please call John Durham, Operations Manager, (505) 564-3100.

Sincerely,

RICHARDSON OPERATING COMPANY

(athlen Colly

Cathleen Colby Land Manager

cc: Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410 New Mexico Oil Conservation Division August 17, 2001 Page 2

List of Exhibits to Application for Authorization to Inject C-108:

- Exhibit 1 Well and Lease Plat 2 mile radius
- Exhibit 2 Well Records Pubco-Carr Russell Federal No. 1
- Exhibit 3 Operations Plan
- Exhibit 4 BOP Diagram
- Exhibit 5 Injection Well Data Sheet
- Exhibit 6 Wellbore Diagram
- Exhibit 7 Survey Plat and Well Pad
- Exhibit 8 Water Analysis: Mesaverde
- Exhibit 9 Water Analysis: Fruitland Coal and Pictured Cliffs
- Exhibit 10 Affidavit of Publication
- Exhibit 11 Proof of Notice

Side 2

III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
 - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
 - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
 - (3) A description of the tubing to be used including its size, lining material, and setting depth.
 - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name.
 - (2) The injection interval and whether it is perforated or open-hole.
 - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
 - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.
- XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,

(4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

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

APPLICATION FOR AUTHORIZATION TO INJECT

I.	PURPOSE:	_ , , _	Pressure Maintenance Yes	X _No	Disposal	Storage
II.	OPERATOR:Ricl	hardson Operati:	ng Company			

ADDRESS: 1700 Lincoln, Suite 1700, Denver, CO 80203

CONTACT PARTY: John Durham

PHONE:(505) 564-3100

III. WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.

- V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
- VII. Attach data on the proposed operation, including:
 - 1. Proposed average and maximum daily rate and volume of fluids to be injected;
 - 2. Whether the system is open or closed;
 - 3. Proposed average and maximum injection pressure:
 - 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,
 - 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
- *VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
- IX. Describe the proposed stimulation program, if any.
- *X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
- *XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
- XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
- XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.
- XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME David B. Richardson	TITLE: President
SIGNATURE: AND B.PR	DATE: August 17, 2001
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* If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: Side 2

III. WELL DATA

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 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
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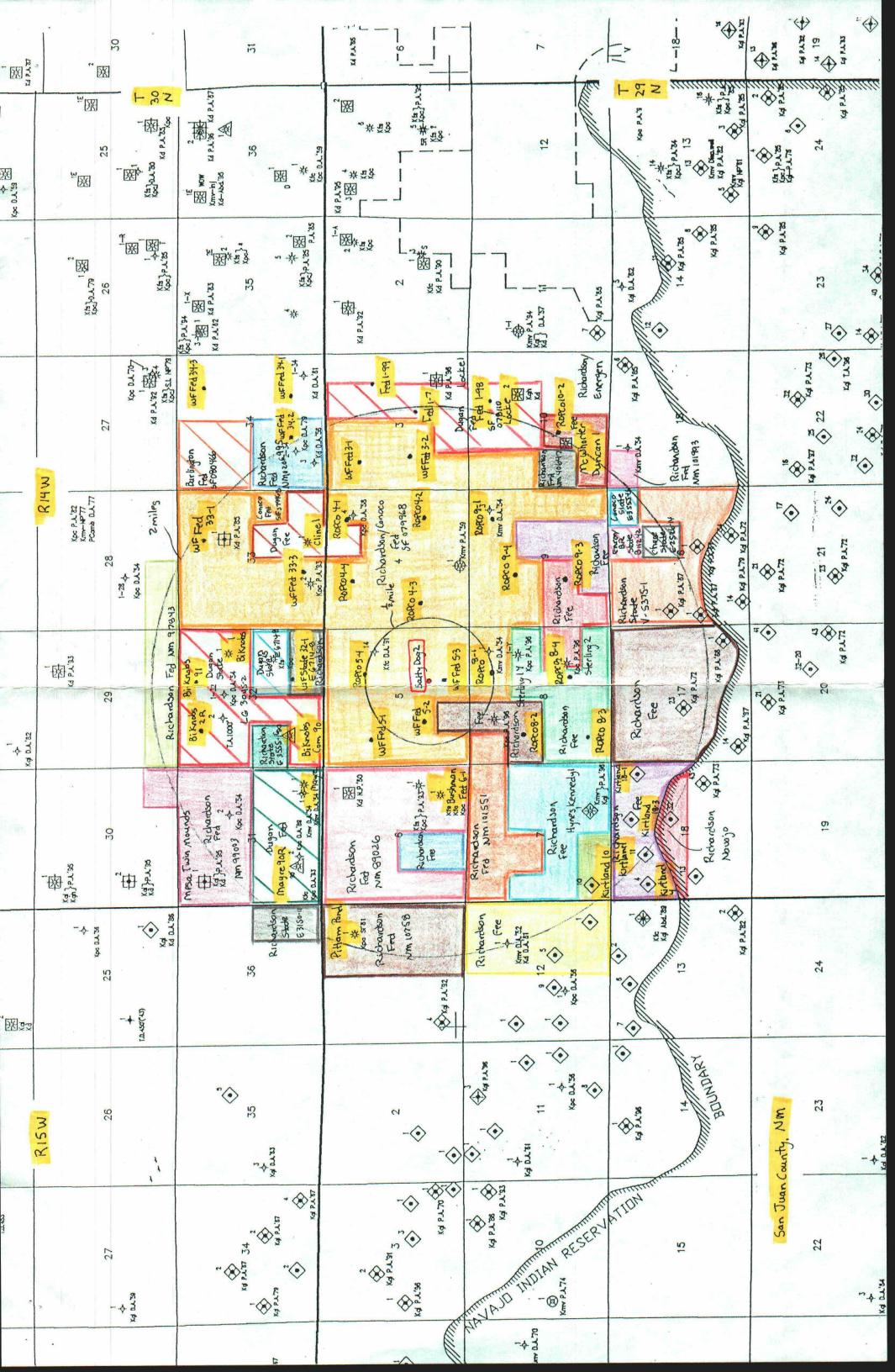
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This is to certify that the above plat was prepared from field noice of actual surveys made by me or under my supervision and that the same are true and correct to the best of my knowledge and belief.

Steph 0 OTEPHEN II. KINNEY Registered Professional Engineer and Land Surveyor

Surveyed

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RICHARDSON OPERATING COMPANY OPERATIONS PLAN

SALTY DOG No. 2

August 17, 2001

l .	Location:	1495'	n 5, Township 29 Nort FSL and 1477' FEL an County, New Mexi		est, NMPM
	Field: Surface: Minerals:	Fee - I	o Mesaverde Richardson Production al SF-079968	Elevat Company	tion: 5297'
II.	Geology:		Formation Tops	De	pths
					eet eet eet feet feet feet
			Water and gas:	600 feet 790 feet 800 feet	Fruitland Coal Basal Coal Pictured Cliffs
			Water:	2200 feet 3310 feet	Cliff House Point Lookout
		A.	Logging Program:	Induction /GI	R and Density Logs at TD
		B.	pressure will be cont	ained as specifi are expected in	e pressure is 400 psi. This ied in III B. and C. below. No a this well. No H2S zones are

anticipated in this well.

Richardson Operating Company Operations Plan Page 2

- III. Drilling:
- A. Contractor: To be determined
- B. Mud Program: The surface hole will be drilled with a fresh water mud. The production hole will be drilled with a fresh water polymer mud. The weighting material will be drill solids, or if conditions dictate, barite. The maximum mud weight expected is 8.7 ppg.
- C. Minimum Blowout Control Specifications:

The drilling contract has not yet been awarded, thus the exact BOP model to be used is not yet known. A typical 2,000 psi model (see attached Exhibit 4) or comparable model will be used. Double ram type or annular system with a rotating head will be used. All ram preventers and related equipment will be hydraulically tested at nipple-up and after any use under pressure to 1000 psi.

The blind rams will be hydraulically activated and checked for operational readiness each time pipe is pulled out of the hole. All checks of the BOP stack and equipment will be noted on the daily drilling report. The BOP equipment will include a kelly cock, floor safety valve, and choke manifold all rated to 2000 psi.

IV. Materials:

A. Casing Program:

Hole Size	Depth	Casing Size	Wt. & Grade
9 7/8"	200'	8 5/8"	24# J-55
6 3/4"	3700'	5 1/2"	15.5# K-55

B. Float Equipment:

a) Surface Casing:	None
b) Production Casing:	5 ½" cement guide shoe and self fill insert float collar. Place float one joint above shoe. Five centralizers spaced every other joint above shoe and five turbolizers every other joint from the top of the well.

Richardson Operating Company Operations Plan Page 3

V. Cementing:

Surface casing: 8 5/8", use 43 sx (50 cu ft) of C1 "B" with 2% CaCl2 (Yield = 1.18 cu ft/sx; slurry weight = 15.6 ppg). 100% excess to circulate cement to surface. WOC 12 hrs. Pressure test surface casing to 600 psi for 30 min. Production casing: 5 ½", before cementing circulate hole with at least 1 ½ hole volumes of mud. Precede cement with 30 bbls of fresh water. Lead with 185 sx (382 cu ft) of Cl "B" with 2% metasilicate (Yield = 2.06 cu ft/sx; slurry weight = 12.5 ppg). Tail with 130 sx (160 cu ft) of Cl "B" with 2% CaCl2 (Yield = 1.18 cu ft/sx slurry weight = 15.6 ppg). Total cement volume is 542 cu ft. (75% excess to circulate cement to surface).

- VI. Stimulation: If stimulation is required, 4000 gal 15% HCl acid will be pumped into Mesaverde perforations.
- VII. Operations: Average Daily Rate: 1000 bwpd Maximum Daily Rate: 1000 bwpd System is closed. Average Injection Pressure: 600 psi Maximum Injection Pressure: 740 psi

Source of water to be injected is from Fruitland Coal and Pictured Cliffs wells in the area. Representative samples of this water are included in this report.

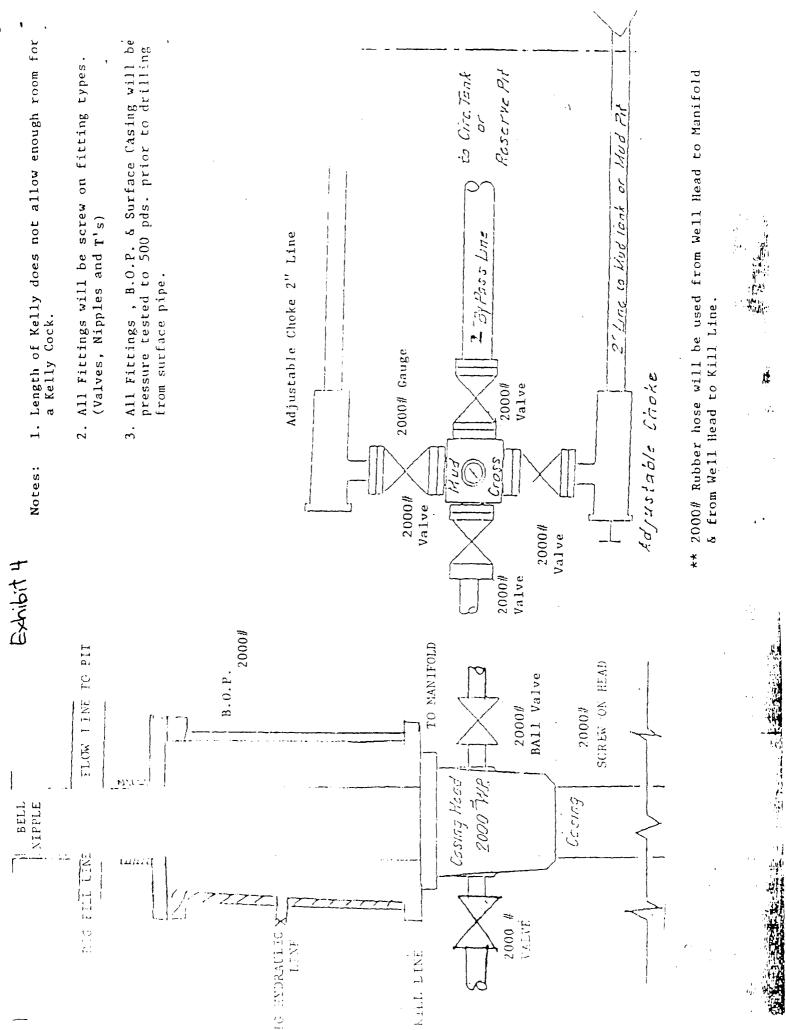
A water sample from the Mesaverde taken from the Stella Needs A Com #1E well, located in the NE/4SW/4 of Section 36, Township 30 North, Range 14 West, is also included in this report.

Geological data for the disposal zone is presented in Administrative Order SWD-595.

There are no fresh water wells within one mile of this location.

I have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.

David B. Richardson President

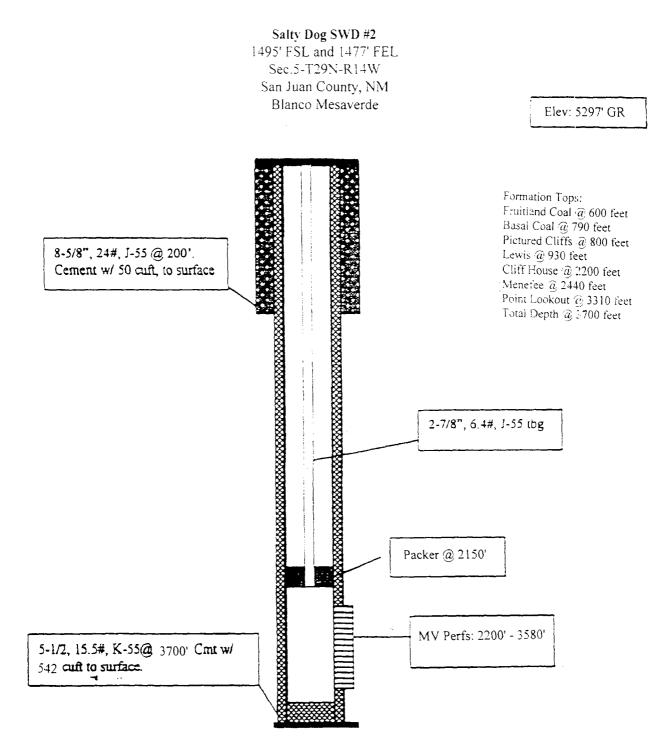


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Side 1	INJECTION WELL DATA SHEET	LL DATA SHEET			
OPERATOR:	Richardson Operating Company	Y			
WELL NAME & NUMBER:	Salty Dog No. 2				
WELL LOCATION: FOOT	1495' FSL, 1477' FEL J FOOTAGE LOCATION UNIT LETTER	J 5 ETTER SECTION	NOL	29N TOWNSHIP	14W RANGE
WELLBORE SCHEMATIC	CHEMATIC		<u> VELL CONSTH</u> Surface Casing	<u>WELL CONSTRUCTION DATA</u> Surface Casing	
	liole	Hole Size: 9 7/8		Casing Size: 8 5/8,	. 24#
	Cem	Cemented with: 43	sx.	or 50	U3
	Top	Top of Cement: Surface		Method Determined:	
		Int	Internediate Casing	Casing	
	Iloic	Ilole Size:		Casing Size:	
	Com	Cemented with:	SX.	or	u³
	Top	Top of Cement:		Method Determined:	
		Pr	Production Casing	asing	
	Ilole	llole Size: 6 3/4		Casing Size: 5 1/2,	, 15.5#
	Ccm	Cemented with: 185 + 130	SX.	or 542	U,
	Top	Top of Coment: Surface		Method Determined:	
	T ota	Total Depth: 3700 *			
		II	Injection Interval	erval	
	MM	MV perfs: 2200' - 35	3580ftet to	to perforated	
		(Perforated or	Open Hole	(Perforated or Open Hole; indicate which)	

Give the name and depths of any oil or gas zones underlying or overlying the proposed Has the well ever been perforated in any other zone(s)? List all such perforated °Z intervals and give plugging detail, i.e. sacks of cement or plug(s) used. No None Name of Field or Pool (if applicable): Blanco Mesaverde **INJECTION WELL DATA SHEET** X Yes Tubing Size: 2 7/8", 6.4#, J-55 Lining Material: 50001 8001 N/A If no, for what purpose was the well originally drilled? Additional Data Name of the Injection Formation: Mesaverde Other Type of Tubing/Casing Scal (if applicable): _ **Pictured Cliffs** Packer Setting Depth: 2150' estimate Type of Packer: 5 1/2" x 2 7/8" Is this a new well drilled for injection? Gallup injection zone in this area: e i сi Ś. 4

Side L



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Form C - 102

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

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

AP	'A Numi			Pool Code		Pool Name						
Property Co	ode				Property Ne	744			Wel Nuber			
	_				SALTY D	0G			2			
OGRED No.					Operator N				Elevation			
			R	KHARDSC	N OPERAT		ANY		5297			
		-		•	Seria	a Location						
UL of Lot	Sec.	Тяр.	Rgs.	Lot lot	Feet Irom>	North/South	Feel Iron>	County				
J	5	29 N	14 W.		1495	SOUTH	1477	SAN JUAN				
A	t			Botton	Hole Locotio	n if Different	. L	<u></u>				
UL of Lot	Sec	Tup.	Rgs.	Lot los.	Feet Iron>	North/South	Feet from>	East/West	County			
Dediction	Jai	N?	Corectido	tion	· · · · · · · · · · · · · · · · · · ·	L	Ord	er No.				
				5				I hereby containe to the I belief. Signatur Printed Title Date SURV I hereb on this	· · · · · · · · · · · · · · · · · · ·			
					J		1477 [.]	or under some is of my	r my supervision, and that the true and connect to the best ballef. I Survey			

Salty Dog # 2 well pad and section front 40' North O'05 Scole 1" -40' cut ር fill 🗆 set stake & lath **\$**2: 5297[.] C 0 grd 50 right left 8 15 65 ŝ 90. . 95[.] . 5300' rear



Dugan Production Corp. MPANY OF NORTH AMERICA Exhibit 8 . Stella Needs A Com No. 1 - Conversion to SWD API WATER ANALYSIS Company: DUGAN PROD. W.C.N.A. Sample No.: S106695 Legal Description: Field: Well: STELLA NEEDS & COM #1E Lease or Unit: Water.B/D: Depth: Sampling Point: SWAB 'ormation: POINT LOOKOUT/MESA VERDE State: N.M. Sampled By: J. ALEKANDER Date Sampled: 04/24/95 County: Type of Water(Produced, Supply, ect.): PROPERTIES Iron, Fe(total): 250 pH: 6.30 Specific Gravity: 1.050 Sulfide as H2S: 0 Total Hardness: Resistivity (ohm-meter): .13 (see below) Tempature: 78F DISSOLVED SOLIDS me/l CATIONS mg/l Sodium, Na: 20470 : 890 Sample(ml): 1.0 ml of EDTA: 5.20 Calcium, Ca: 2084 : 104 Magnesium, Mg: 170 : 14 Sample(ml): 1.0 ml of EDTA: .70 Barium, Ba: N/A : N/A Potassium, K: mg/l me/l ANIONS Sample(ml): 1.0 ml of AgNO3: 4: .5000Chloride, Cl: 31905 : 1.80 900 Sulfate, SO4: 3750 : 78 1.0 ml of H2SO4: Carbonate, CO3: Sample(ml): : Bicarbonate, HCO3: 1830 : Sample(ml): 1.0 ml of H2SO4: .30 30 Total Dissolved Solids (calculated): 60209 1.0 ml of EDTA: Sample(ml): Total Hardness: 5900

REMARKS AND RECOMMENDATIONS:

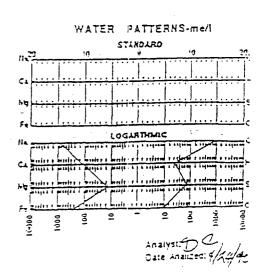


Exhibit 9

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BJ SERVICES COMPANY

WATER ANALYSIS #FW01W266

FARMINGTON LAB

	GENERAL INI	ORNATION	
WELL: BUSH		DEPTH: DATE SAMPLED: 10/19, DATE RECEIVED:10/20; COUNTY:SAN JUAN FORMATION: FC/PC	/98

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AFFIDAVIT OF PUBLICATION

Ad No. 44869

STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, August 15, 2001.

And the cost of the publication is \$20.56.

ON <u>8/17/01</u> CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

My Commission Expires April 02, 2004

COPY OF PUBLICATION

918 Legais LEGAL NOTICE Operating Richardson Company will file an application on August 17, 2001, for approval to inject water, produced from oil and gas wells, Into the Mecaverde formation in the Salty Dog No. 2, located in the NW/4SE/4 of Section 5, Township 29 North, Range 14 West, San Juan County, New Mexico, at a depth from 2000 to 3700 feet with surface injection pressure up to 600 pounds per square Inch. 🗇 Surface owners and offset openators must file any objections of loguest for public bearing with the New Meioco Ol Conservation Division, 1220 South St. Francis Drive, Santa Fe. New Mexico 67504 Arthin 15 Mays, of the dele of this notice. The Operating Richardson Company contact person is John Dumam, 2100 La Plata Hwy, Farmington, NM 87401, talephone (505) 684-3100.

Legal No. 44659, published in The Daily Times, Farmington, New Mexico, Wednesday, August 15, 2001.



RICHARDSON OPERATING COMPANY

1700 Lincoln, Suite 1700 Denver, Colorado 80203 (303) 830-8000 FAX (303) 830-8009

August 17, 2001

Mr. William W. Franklin Conoco Inc. Mail Code DU 3092 600 North Dairy Ashford Houston, TX 77079

Certified Mail Return Receipt 7000 1670 0006 8579 3524

Re: Application for Authorization to Inject Salty Dog No. 2 NW/4SE/4-Section 5-T29N-R14W San Juan County, New Mexico

Gentlemen:

As a leasehold owner within one-half mile of the proposed Salty Dog No. 2 disposal well, you are being notified of our Application for Authorization to Inject. Richardson Operating Company seeks to dispose of water produced from the Fruitland Coal and Pictured Cliffs formations into the Mesaverde formation. Objections, or a request for hearing, must be filed within 15 days with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505,

Enclosed is a copy of our Form C-108 and associated Exhibits. If you need additional information, please do not hesitate to call.

Sincerely,

RICHARDSON OPERATING COMPANY

Cathleen Collag

Cathleen Colby Land Manager

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY					
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.	A. Received by (Please Print Clearly) B. Date of Deliver					
Print your name and address on the reverse so that we can return the card to you.	C. Signature					
Attach this card to the back of the mailpiece, or on the front if space permits.	X Agent					
1. Article Addressed to:	D. Is delivery address different from item 1? If YES, enter delivery address below: No					
Conoco Inc Attn: Bill Franklin Mail Code DU 3092						
600 North Dairy Ashford	3. Service Type					
Houston, TX 77079	Certified Mail Express Mail					
	Registered Return Receipt for Merchandis Insured Mail C.O.D.					
	4. Restricted Delivery? (Extra Fee) Yes					
2. Article Number (Copy from service label)						
7000 1670 0006 85	579 3524					

Form 9-831 a						et Bureau No. 4 oval expires 12-3		1
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I understand that this	plan of work must receive ap	proval in writii	ng by the Geologica	I Survey before	e operations m	ay be commer	nced.	
	O PETROLEUM COMPO	PATION						
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			Title	Mgr. P	rod. Deg	rt.		

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As per Store Hayrien, Lo objection to this application

P12761

DEPAR	(SUBMIT IN TRIPLICATE) UNITED STATES TMENT OF THE INTERIOR GEOLOGICAL SURVEY	Budget Bureau No. 42-R358.4. Approval expires 12-31-60. Land Office Lasse No. Image: No. Unit N WELLS Image: No. R SHUT-OFF.
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New Mexico Oil Conservation Division---Enginnering Bureau Administrative Application Process Documentation

Date Application Received:	J-2 C'
Date of Preliminary Review:	1-: 401
(Note: Must be within 10-days of received	,
Results:Application Com	oleteApplication Incomplete
Date Incomplete Letter Sent:	
Deadline to Submit Requested Informatio	n:
Phone Call Date: (Note: Only applies if requested data is no	t submitted within the 7-day deadline)
Phone Log Completed?	YesNo
Date Application Processed:	
Date Application Returned:	
(Note: Only as a last resort & only after r	peated attempts by the Division to obtai

the necessary information to process the application)