



Rodey, Dickason, Sloan,
Akin & Robb, P.A.
Post Office Box 1888
Albuquerque, New Mexico 87103
201 Third Street NW
Suite 2200
Albuquerque, New Mexico 87102

12226
12227
12228

(505) 765-5900 Telephone (505) 768-7395 Facsimile

**FACSIMILE
TRANSMITTAL SHEET**

TO: Rand L. Carroll, Esq. Fax N^o: 827-8177
FROM: Mark K. Adams, Esq. DATE: August 10, 1999

TOTAL NUMBER OF PAGES, INCLUDING THIS PAGE: 9

If you do not receive all of these pages, please call Cheri Cole at (505) 768-7226.

IMPORTANT!

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS CONFIDENTIAL AND INTENDED SOLELY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, COPYING, OR UNAUTHORIZED USE OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE, AND RETURN THE FACSIMILE TO THE SENDER AT THE ABOVE ADDRESS VIA THE UNITED STATES POSTAL SERVICE. THANK YOU.

MESSAGE:

JAMES C. RITCHIE
ROBERT M. BT. JOHN
JOSEPH J. MULLINS
MARK K. ADAMS
ROBERT G. MCCORKLE
BRUCE HALL
JOHN P. BALAZAR
WILLIAM S. DIXON
JOHN P. BURTON
REX D. THROCKMORTON
JONATHAN W. HEWES
W. ROBERT LASATER, JR.
MARK C. MEIERING
CATHERINE T. GOLDBERG
TRAVIS R. COLLIER
JO SAXTON BRAYER
EDWARD RICO
W. MARK MOWERY
PATRICK M. SHAY
NANCY J. APPLEBY
DAVID C. DAVENPORT, JR.
ELLEN T. BERAK
TRACY MCGEE JENKS
HENRY M. BOYRHOFF
CHARLES K. PURCELL
ANDREW G. SCHULTZ
JOHN M. BRANT
JOSEPH B. ROCHELLE
SCOTT D. GRADON

SUSAN S. THROCKMORTON
DEWITT M. MORGAN
MARK A. SMITH
R. NELSON FRANSE
THERESA W. PARRISH
PAUL A. KOLLER
JAMES P. BREG
JAY D. HALL
CHARLES J. VIGIL
MARY KELEHER CASTLE
THOMAS L. STAM
DAVID W. BUNTING
BENJAMIN C. ROYBAL
GARY D. EISENBERG
LEBLIE MCCARTHY APODACA
SUSAN S. BARGER
MCDONNELL GORDON
PAUL C. COLLINS
KEVIN LYNN WILDENSTEIN
JEFFREY M. CROASDELL
JEFFREY L. LOWRY
DEBORAH E. MANN
ALICE NYSTEL PAGE
AMY E. BADGER
THOMAS A. DUTLER
GLENN A. BEARD
LISA A. CHAVEZ
JOCELYN C. DRENNAN

RODEY, DICKASON, SLOAN, AKIN & ROBB, P. A.
COUNSELORS AND ATTORNEYS AT LAW
ALBUQUERQUE PLAZA
201 THIRD STREET NW, SUITE 2200
ALBUQUERQUE, NEW MEXICO 87102

P.O. BOX 1888
ALBUQUERQUE, NEW MEXICO 87103
WEB-SITE: WWW.RODEY.COM

TELEPHONE (505) 785-5900

FACSIMILE (505) 768-7395

EMAIL: INFO@RODEY.COM

COUNSEL
JEFFREY W. LOUBET
RICHARD C. MINZNER
THOMAS P. GULLEY
S. J. BEZERR, JR.

OF COUNSEL
DON L. DICKASON
JACKSON G. AKIN
RAY H. RODEY
JOHN D. ROBB
DEBRA ROMERO THAL

PEARCE C. RODEY (1989-1998)
WILLIAM A. BLOAN (1910-1992)

SANTA FE OFFICE
MARCY PLAZA
123 EAST MARCY STREET, SUITE 101
SANTA FE, NEW MEXICO 87501-2034
P.O. BOX 1387
SANTA FE, NM 87504-1387
TELEPHONE (505) 884-0100
FACSIMILE (505) 985-9542

WRITER'S DIRECT NUMBER

August 10, 1999

Rand L. Carroll, Esq.
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505-5472

VIA FACSIMILE

Dear Mr. Carroll:

Faxed herewith are copies of two of the applications we discussed yesterday by Williams Production Company to the Division for administrative approval of non-standard gas units. Also faxed herewith is a copy of Mr. Stogner's response to the applications. Mr. Stogner advised me yesterday that three of Williams' applications are scheduled for hearing on August 19 as Cases N^o 12226, 12227 and 12228.

Williams believes that it is clear under Rule 104(D)(2) that its applications may be approved administratively without a hearing.

Please let me know if you have questions. I look forward to your response.

Yours very truly,

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By

Mark
Mark K. Adams

MKA:cc
Enclosure

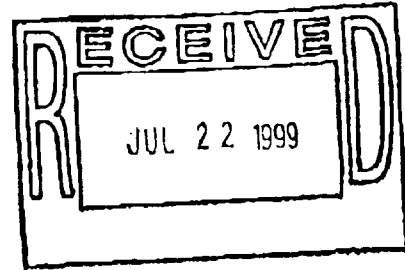

WALSH ENGINEERING & PRODUCTION CORP.

 Petroleum Engineering Consulting
 Lease Management
 Contract Pumping

 7415 East Main
 Farmington, New Mexico 87402
 (505) 327-4892 • Fax: (505) 327-9834

July 16, 1999

 Ms. Lori Wrotenbery
 New Mexico Oil Conservation Division
 2040 S. Pacheco
 Santa Fe, NM 87505

 Re: Non-Standard Gas Unit
 Williams Production Company
 Rosa Unit #164A
 1495' FSL, 1210' FEL
 Section 1, T31N R6W
 Rio Arriba, NM
 Blanco Mesa Verde


Dear Ms. Wrotenbery,

This is a request on behalf of Williams Production Company for administrative approval for a non-standard gas unit in the Blanco Mesa Verde pool for the referenced well. The proposed spacing unit is south half of Section 1, T31N, R6W, which is 303.88 acres due to a variation in the legal subdivision of the U.S. Public Land Surveys.

As the Unit Operator of the Rosa Unit, Williams Production is the only offset operator. Attached is a plat indicating the well location and proposed spacing unit.

Thank you for your consideration and approval of this application. If you have any questions please do not hesitate to call upon me.

Sincerely,

 Paul C. Thompson, P.E.
 President, Walsh Engineering

 cc: David Spitz, WPC
 NMOCD Aztec NM
 BLM Farmington NM

07/27/99 TUE 14:08 FAX 918 594 1324

009

PO Box 1980, Hobbs, NM 88241-1980

WPX Gas Mgt / WPX Gas Re
State of New Mexico
Energy, Minerals & Natural Resources C

Form C-1
Revised February 21, 19
Instructions on b
Submit to Appropriate District Offi
State Lease - 4 Copi
Fee Lease - 3 Copi

District II
PO Drawer 00, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
PO Box 2088, Santa Fe, NM 87504-2088

AMENDED REPOF

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 72319	*Pool Name Blanco Mesa Verde
*Property Code 008480	*Property Name ROSA UNIT		*Well Number 154A
*OGRID No. 120782	*Operator Name WILLIAMS PRODUCTION COMPANY		*Elevation 6313'

¹⁰ Surface Location

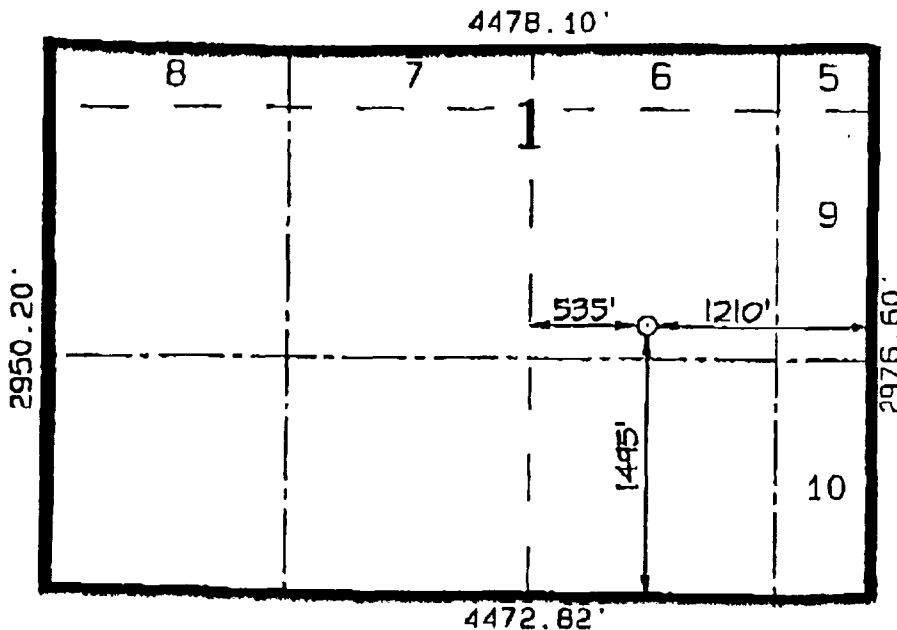
UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County
J	1	31N	6W		1495	SOUTH	1210	EAST	RIO ARriba

¹¹ Bottom Hole Location If Different From Surface

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

*Dedicated Acres 303.88	*Joint or Infill I	*Consolidation Code U	*Order No.
----------------------------	-----------------------	--------------------------	------------

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



¹⁷ OPERATOR CERTIFICATION

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

Paul C. Thompson
Signature

Paul C. Thompson

Printed Name

Agent

Title

2/18/99

Date

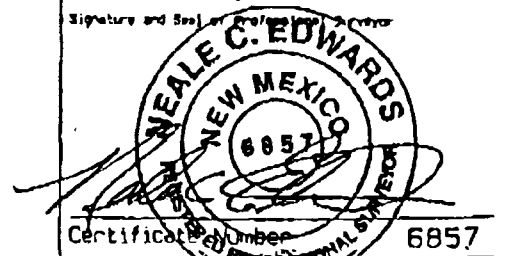
¹⁸ SURVEYOR CERTIFICATION

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 are true and correct to the best of my belief.

FEBRUARY 3, 1999

Date of Survey

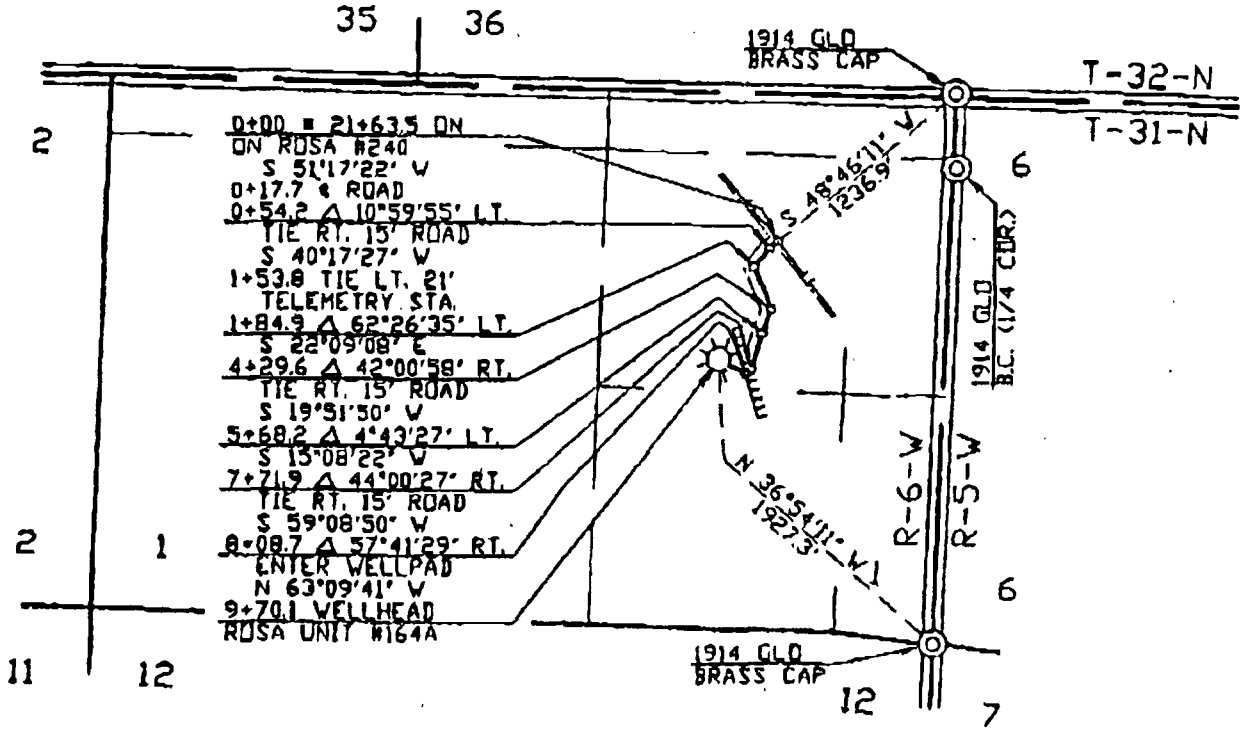
Signature and Seal of the Surveyor



Certification Number 6857

Check on

NOTE: BEARINGS ARE BASED ON A GRID BEARING ALONG THE EAST LINE OF SECTION 1, T-31-N, R-6-W, NMPM BLOCK # 1-25-98-1



PL DATA

0+00 TO 9+70.1	BUREAU OF LAND MANAGEMENT	970.1	0.184	0.891	58.794
----------------	---------------------------	-------	-------	-------	--------

SUBDIVISION	OWNER	FEET	MILES	ACRES	RODS
0+00 TO 9+70.1	BUREAU OF LAND MANAGEMENT	970.1	0.184	0.891	58.794

B	2/24/99	FAQ	LINE CHANGE 2/9/99	JOB	CA						
I	1/8/99	FAQ	ISSUED FOR REVIEW	JOB	CK						

NO.	DATE	BY	DESCRIPTION	V.D.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.D.NO.	CHK.	APP.
INFO				STATE: NEV MEXICO		WILLIAMS GAS PROCESSING							
03393				COUNTY: RIO ARRIBA		DIE OF THE WILLIAMS COMPANIES							
DRAWN BY				FAQ		SAN JUAN GATHERING SYSTEM							
CHECKED BY				JOB		WPX - ROSA UNIT #164A							
APPROVED BY				RR		0+00 = 21+63.5 ON ROSA #240							
ENGINEER				BY		DATE							
DESIGNED BY						SCALE: 1" = 1000'							
PROJ. APPROVED				CK		DWG NO. 46A765.0-69-1							
1/16/98				V.D. NO.		SHEET 1 OF 2							



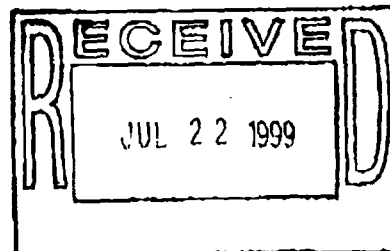
WALSH ENGINEERING & PRODUCTION CORP.

Petroleum Engineering Consulting
Lease Management
Contract Pumping

7415 East Main
Farmington, New Mexico 87402
(505) 327-4892 • Fax: (505) 327-9834

July 16, 1999

Ms. Lori Wrotenbery
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505



Re: Non-Standard Gas Unit
Williams Production Company
Rosa Unit #164
Surface Location: 1500' FSL, 1310' FEL
Bottom Hole Location: 1555' FSL, 1750' FWL
Section 1, T31N R6W
Rio Arriba, NM
Blanco Mesa Verde

Dear Ms. Wrotenbery,

This is a request on behalf of Williams Production Company for administrative approval for a non-standard gas unit in the Blanco Mesa Verde pool for the referenced well. The proposed spacing unit is south half of Section 1, T31N, R6W, which is 303.88 acres due to a variation in the legal subdivision of the U.S. Public Land Surveys.

As the Unit Operator of the Rosa Unit, Williams Production is the only offset operator. Attached is a plat indicating the well location and proposed spacing unit.

Thank you for your consideration and approval of this application. If you have any questions please do not hesitate to call upon me.

Sincerely,

Paul C. Thompson, P.E.
President, Walsh Engineering

cc: David Spitz, WPC
NMOCD Aztec NM
BLM Farmington NM

01/27/99 TUE 14:08 FAX 918 594 1324

WPI Gas Mgt. / WPI Gas Re
Energy, Minerals & Natural Resources Dept

007
Form C
Revised February 21,
Instructions on
Submit to Appropriate District Of
State Lease - 4 Coy
Fee Lease - 3 Coy

District II
PO Drawer 00, Artesia, NM 88211-L

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
PO Box 2088, Santa Fe, NM 87504-2088

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

AMENDED REPO

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 72319	*Pool Name Blanco Meas Verde
*Property Code 008480	*Property Name ROSA UNIT		*Well Number 164
*GRID No. 120782	*Operator Name WILLIAMS PRODUCTION COMPANY		*Elevation 6315'

¹⁰ Surface Location

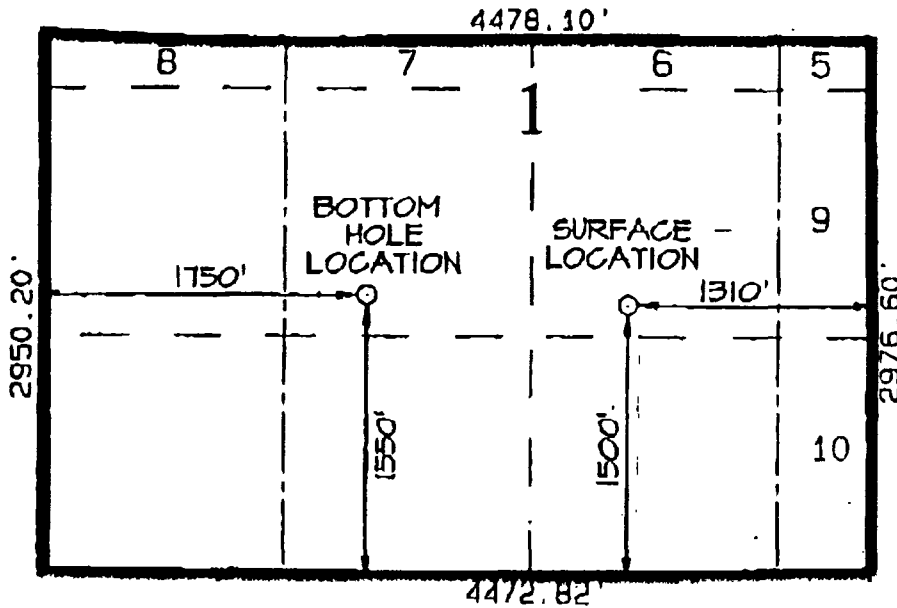
UL or lot no.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
J	1	31N	6W		1500	SOUTH	1310	EAST	RIO ARRIB.

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
K	1	31N	6W		1550	SOUTH	1750	WEST	RIO ARRIB.

*Dedicated Acres 303.88	*Joint or Infill Y	*Consolidation Code U	*Order No.
----------------------------	-----------------------	--------------------------	------------

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



¹⁷ OPERATOR CERTIFICATIO

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

Paul C. Thompson
Signature
Paul C. Thompson
Printed Name
Agent
Title
3/16/99
Date

¹⁸ SURVEYOR CERTIFICATIO

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by or under my supervision and that the same is true and correct to the best of my belief.

FEBRUARY 3, 1999
Date of Survey
Signature and Seal of Surveyor

NEALE C. EDWARDS
NEW MEXICO
6857
Certificate Number 6857



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2948 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 837-7134

July 21, 1999

Williams Production Company
c/o Walsh Engineering & Production Corporation
7415 East Main
Farmington, New Mexico 87402

Attention: Paul C. Thompson

Re: *Administrative application to establish a non-standard 303.88-acre gas spacing and proration unit within the Blanco-Mesaverde Pool comprising all of Irregular Section 1, Township 31 North, Range 6 West, NMPM, Rio Arriba County, New Mexico.*

Dear Mr. Thompson:

The applicable rules governing the Blanco-Mesaverde Pool do not allow this type of non-standard unit to be processed administratively [see Division Order No. R-10987-A and Division Rule 104.D (2)]. However, I have caused this application to be placed on the next available examiner's hearing docket and have it advertised in the following manner:

*"Application of Williams Production Company for a non-standard gas proration, Rio Arriba County, New Mexico. Applicant seeks to establish a non-standard 303.88-acre gas spacing and proration unit within the Blanco-Mesaverde Pool comprising all of Irregular Section 1, Township 31 North, Range 6 West, which is located approximately 5.5 miles south of the New Mexico/Colorado state line at mile corner marker No. 240. Blanco-Mesaverde gas production from both the Williams Production Company's: (i) Rosa Unit Well No. 164 (API No. 30-039-26151), located on the surface 1500 feet from the South line and 1310 feet from the East line (Unit J) of Section 1; and (ii) Rosa Unit Well No. 164-A (API No. 30-039-26080), located 1495 feet from the South line and 1210 feet from the East line (Unit J) of Section 1, is to be dedicated to this unit. **IN THE ABSENCE OF OBJECTION, THIS APPLICATION WILL BE TAKEN UNDER ADVISEMENT.**"*

I anticipate that an order can be issued at that time without any further information or involvement by Williams Production Company.