



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor  
Joanna Prukop  
Cabinet Secretary

30-045-32016

December 16, 2003

Lori Wrotenberg  
Director  
Oil Conservation Division

ConocoPhillips Company  
600 North Dairy Ashford  
WL3-5056  
Houston, Texas 77079

Attention: Jennifer A. Barber  
Coalbed Methane Landman

Re: Burlington Resources Oil & Gas Company's ("Burlington") proposed Howell Com. "J" Well No. 301-S to be drilled, apparently, as an infill coal gas well at an unorthodox location 475 feet from the North line and 815 feet from the West line (Unit D) of Section 11, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. The N/2 of Section 11, being a standard 320-acre lay-down gas spacing unit in the Basin-Fruitland Coal (Gas) Pool (71629) is currently dedicated to Burlington's Howell Com. "J" Well No. 301 (API No. 30-045-26896), located at an unorthodox coal gas well location (approved by Division Administrative Order NSL-2493, dated April 18, 1988) 595 feet from the North line and 1085 feet from the East line (Unit A) of Section 11. Further, Section 11 is situated within the "High Productivity Area" designated in Rule 7 (b) (1) of the "Special Rules and Regulations for the Basin-Fruitland Coal (Gas) Pool", as promulgated by Division Order No. R-8768, as amended by Division Order No. R-8768-F.

Dear Ms. Barber:

Your letter dated November 26, 2003 and a copy of your e-mail correspondence of November 24, 2003 to Mr. Steve Hayden, Geologist Aztec District Office of the Division, were brought to my attention this morning, Tuesday, December 16, 2003.

From the last sentence in your November 26<sup>th</sup> letter, "ConocoPhillips objects to this location and requests that Burlington complete this well no closer than 660' from the section line", ConocoPhillips Company, as the affected offset operator to the north in Section 2 (S/2), Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico, objects only to Burlington's unorthodox location of its proposed Howell Com. "J" Well No. 301-S and not to it being an "infill" well. This location being unorthodox would naturally require Burlington to file for an exception to Rule 7 (a) (1) of the special rules governing the Basin-Fruitland Coal (Gas) Pool. To date Burlington has not submitted an application as such under Rule 7 (b) of the special pool rules and Division Rule 104.F with the Division's Santa Fe Office.

My "cc"-ing Burlington and attaching a copy of your November 26th letter hereby places Burlington on notice of ConocoPhillips's position to the location of the

**ConocoPhillips Company**

**December 16, 2003**

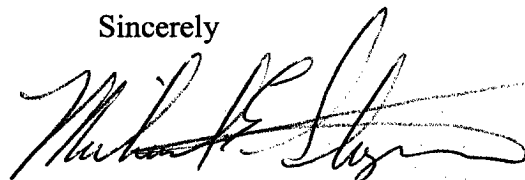
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proposed Howell Com. "J" Well No. 301-S. Should Burlington submit such an application, and the application is brought to my attention; their request will be duly docketed for a Division hearing.

Should you have any questions concerning this matter, please contact your legal counsel, Mr. Scott Hall in Santa Fe at (505) 989-9614. Thank you.

Sincerely



Michael E. Stogner  
Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division – Aztec  
Gail MacQuesten, Assistant General Counsel for the New Mexico Energy,  
Minerals, and Natural Resources Department – Santa Fe  
New Mexico State Land Office – Santa Fe  
Scott Hall, Legal Counsel for ConocoPhillips Company – Santa Fe  
W. Thomas Kellahin, Legal Counsel for Burlington Resources Oil & Gas  
Company – Santa Fe  
Burlington Resources Oil & Gas Company, Attention: Ms. Joni Clark –  
Farmington



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OIL CONSERVATION  
DIVISION

November 26, 2003

Oil Conservation Division  
State of New Mexico  
1000 Rio Brazos Rd.  
Aztec, NM 87410

Attn: Mr. Steve Hayden

RE: **Howell Com J 301 S**  
**Section 11-30N-8W**  
**San Juan County, New Mexico**



Gentlemen:

Burlington has proposed to drill the Howell Com J # 301S at a location 475' FNL and 815' FWL of Section 11-T30N-R8W. This location offsets the ConocoPhillips FC State Com #21 in the SW/4 of Section 2-30N-8W. ConocoPhillips objects to this location and requests that Burlington complete this well no closer than 660' from the section line.

Sincerely,

Jennifer Barber  
CONOCOPHILLIPS