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NEW MEXICO OIL CONSERVATION DIVISION Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505

ABOVE THIS LINE FOR DIVISION USE ONLY

# See Next PY ADMINISTRATIVE APPLICATION CHECKLIST

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

### **Application Acronyms:**

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] [PLC-Pool/Lease Commingling] [CTB-Lease Commingling] [DHC-Downhole Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [PC-Pool Commingling] [PMX-Pressure Maintenance Expansion] [WFX-Waterflood Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [PPR-Positive Production Response] [EOR-Qualified Enhanced Oil Recovery Certification]

TYPE OF APPLICATION - Check Those Which Apply for [A] [1]

Location - Spacing Unit - Simultaneous Dedication NSP

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement DHC **CTB** PLC PC. OLS OLM

Injection - Disposal - Pressure Increase - Enhanced Oil Recover [C]**SWD** IPI **EOR PPR PMX** WFX

Other: Specify [D]

NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply [2]

Working, Royalty or Overriding Royalty Interest Owners

Offset Operators, Leaseholders or Surface Owner

Application is One Which Requires Published Legal Notice [C]

[D] Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

For all of the above, Proof of Notification or Publication is Attached, and/or,

**[F]** Waivers are Attached

SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF [3] APPLICATION INDICATED ABOVE.

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.

Print or Type Name

BRIAN WOOD (505) 466-8120 FAX 466-9682 Signature

Title

Date

CONSULTANT

12-22-01

e-mail Address

brian@permitswest.com



## REQUEST FOR ADMINISTRATIVE APPROVAL FOR NON-STANDARD LOCATION FOR RICHARDSON OPERATING CO.

### RPC 17 #4 GAS WELL

562' FSL & 1392' FEL SEC. 17, T. 29 N., R. 13 W., SAN JUAN COUNTY, NM

- I. The well is on private surface and on a private oil and gas lease. The proposed location is non-standard for the West Kutz Pictured Cliffs due to topography and surface uses. The well must be at least 660' from all quarter section lines. This well is 562' from the south line of the southeast quarter of Section 17. Thus, it is 98' too far south. Richardson controls the Pictured Cliff rights to the south and has already staked a standard location in the northeast quarter of Section 20. Richardson operates a standard Pictured Cliffs well (Eaton White #1) in the northwest quarter of Section 20. The APD (Exhibit A) is attached.
- II. A C-102 (Exhibit B) showing the well location and proration unit (hatched line marking the southeast quarter = 160 acres) for the Pictured Cliffs is attached. Richardson's leasehold (= solid line) is shown on the attached copy (Exhibit C) of the Farmington South USGS topo map. The well is 2,423' from the closest non-Richardson operated lease. A standard location would be closer to the exterior of the lease.
- III. According to NM Oil Conservation Records reviewed in their Santa Fe office on December 12, 2001 and on line on December 21, 2001; there is no production from the Pictured Cliffs within a minimum 2,863' radius. Closest such well is Richardson's White #1 at 1450' FNL & 1850' FWL 20-29n-13w. A copy of the Farmington South 7.5' USGS map (Exhibit D) is attached showing the proposed well site, existing producing wells (3 Dakota and 3 PC {all Richardson}), and 21 plugged and abandoned wells. Richardson is the operator of its fee lease and leases within a minimum 2,423'. Registered letters were sent on December 22, 2001 to the offset interest owners. A copy of the receipts and letters will be provided.
- IV. A copy of the Farmington South USGS map is attached (Exhibit E). The proposed well site is marked. Pictured Cliffs' proration unit (solid line) is all of the southeast quarter of Section 17, which is 160.00 acres in size. A

dashed line marks the standard drilling window.

- V. Topography is one reason forcing a non-standard location. The center of the drilling window is bisected by the San Juan River and its floodplain (see Exhibit E).
- VI. Archaeology is not an issue.

VII. The non-standard location is requested because of surface conditions. One-fourth of the drilling window (see dashed line on attached assessor's plat (Exhibit F)) is inside the Farmington City Limits. NM 371 cuts a slice out of the drilling window. Other manmade impediments inside the drilling window include a nursing home, large gas station, trucking company, church, and houses. Surface owners with land in the drilling window were approached about drilling on their land. None accepted. Finally, an owner just south of the window agreed - provided Richardson would buy their acre. Richardson did. In order for Richardson to even be close to the drilling window, Richardson had to stake a smaller than normal pad (see pad plan view on (Exhibit G).

VIII. Directional drilling is not a feasible for such a shallow well.

IX. I hereby certify that notice has been sent to the following lessees, lessors, operators of spacing units, or owners of undrilled leases which adjoin the applicant's spacing unit on one or more of the two sides or the single closest corner to the proposed well and that the information is current and correct:

Gerald Cochran
First National Bank of Iowa City
Elizabeth Fisk
William Hall
(Mrs.) Howard Henderson
Navajo Bible Missionary Church
New Mexico State Highway Dept.
Jeanette Satterly
Arnette Small

Signature, Title, & Date

Consultant 12-22-01

STATE OF NEW MEXICO	)
	) SS:
COUNTY OF SANTA FE	)

The foregoing instrument was acknowledged before me this 22nd day of December, 2001 by Brian Wood. Witness my hand and official seal.

My Commission Expires:

Notary Rublic

My Commission Expires: 29

Business Address: 37 VERANÓ LOÓP, SANTA FE, NM 87508

cc: Aztec OCD, Van Blaricom



District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 South First, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

### State of New Mexica 2022 Energy Minerals and Natural Resources

Form C-101 Revised March 17, 1999

Oil Conservation Division C 1220 South St Francis Dr Santa Fe NM 87505

Submit to appropriate District Office State Lease - 6 Copies Fee Lease - 5 Copies

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State of New Mexico Energy. Minerals & Mining Resources Department OIL CONSERVATION DIVISION 2040 South Pache∞ Santa Fe. NM 87505

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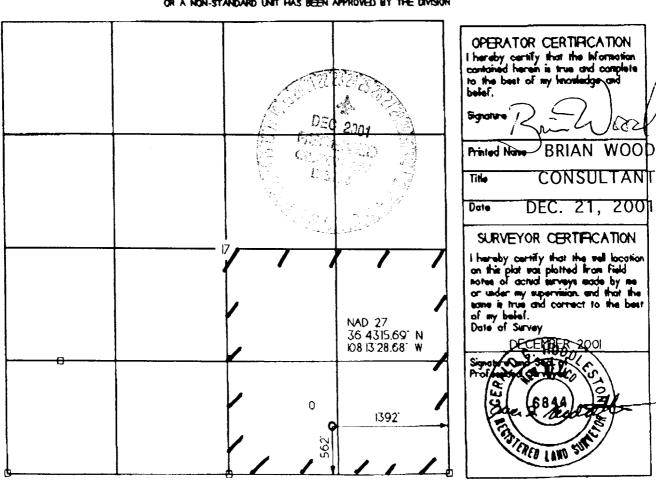
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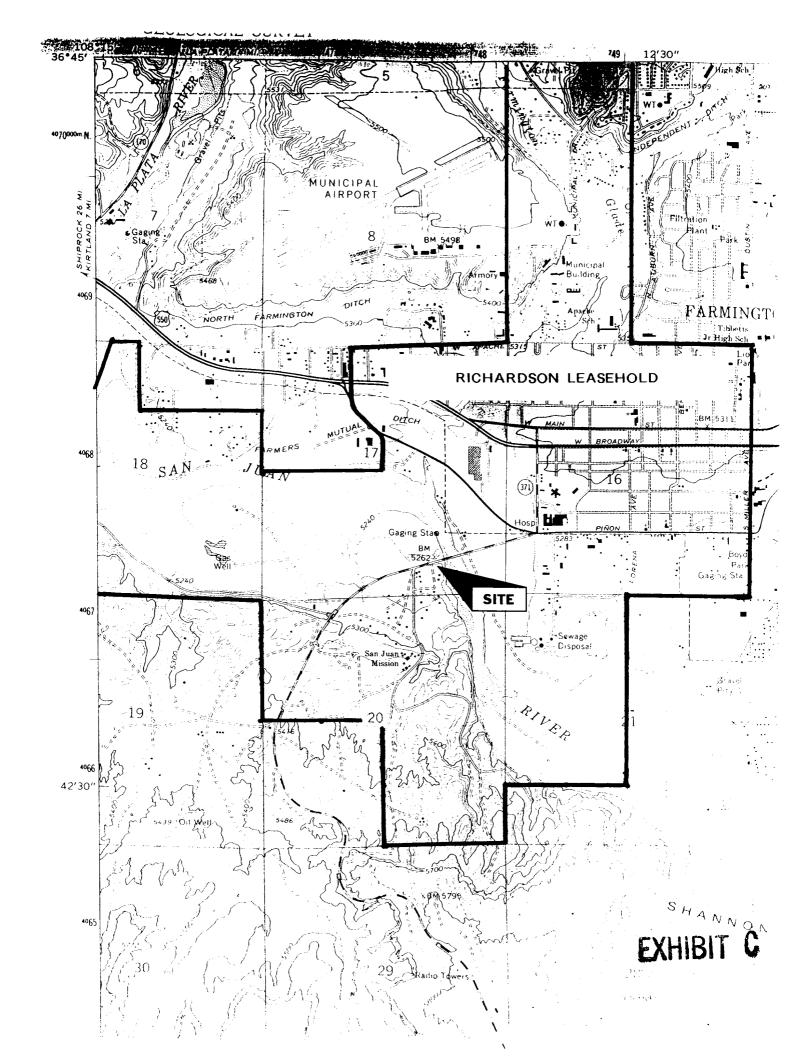
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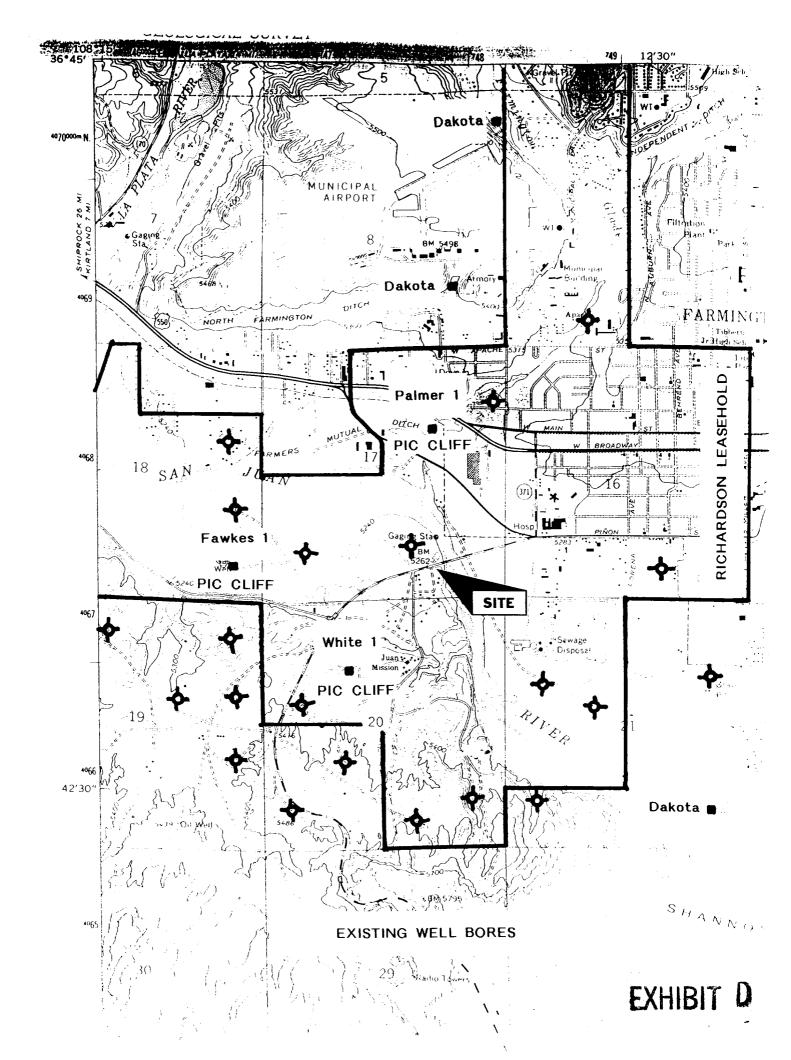
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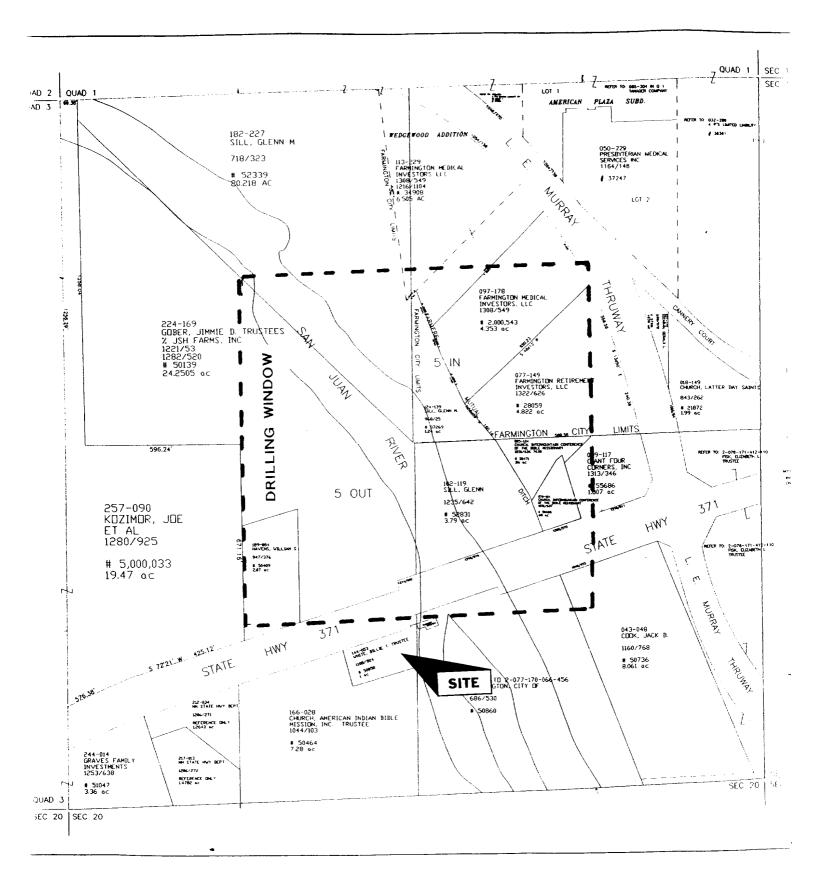
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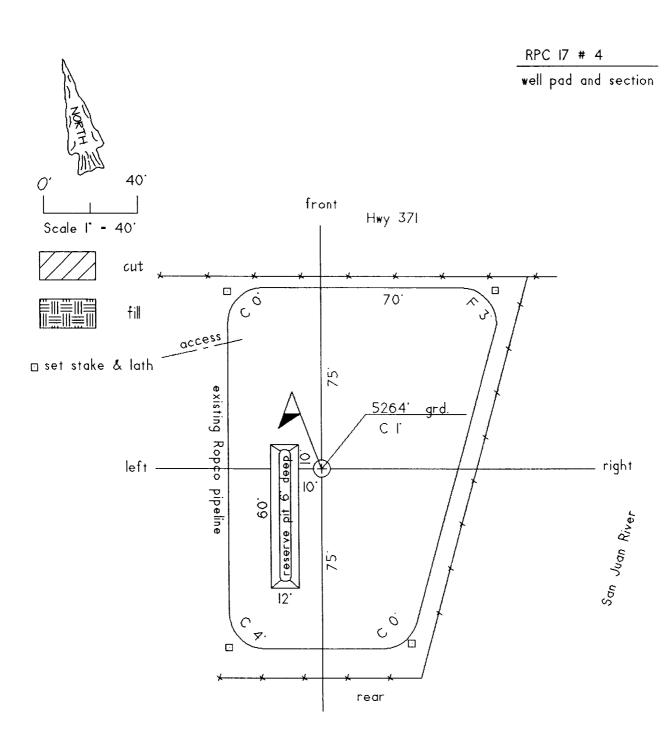
NO ALLOWABLE WILL ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

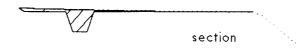














466

December 21, 2001

Gerald Cochran 1509 Schofield Ln. Farmington, NM 87401

As required by New Mexico Oil Conservation Division Rules, I am notifying you of the following non-standard location for a well. This letter is a notice only. No action is needed unless you have questions or objections.

Richardson Operating Co. is applying to drill its RPC 17 #4 gas well. The minimum distance from a Pictured Cliffs gas well to a quarter section line is 660'. Due to surface conditions, the well is 562' from the south line of the section, or 98' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 2,863' from the closest Pictured Cliffs producer (Richardson's White #1 well). See attached map for more details.

Well Name: RPC 17 #4 Total Depth: 1,150'

Proposed Producing Zone: Pictured Cliffs sandstone

Acreage Dedication: 160.00 acres (southeast quarter of Section 17)

Location: 562' FSL & 1392' FEL Sec. 17, T. 29 N., R. 13 W.,

San Juan County, NM on a private lease

<u>Approximate Location:</u> ≈1/4 air mile southwest of Farmington, NM
<u>Applicant Name:</u> Richardson Operating Co. (303) 830-8000

Applicant's Address: 1700 Lincoln St., Suite 1700, Denver, Co. 80203

<u>Submittal Information</u>: Application for a non-standard location will be filed with the NM Oil Conservation Division. If they determine the application complies with the applicable regulations, then it will be approved. The New Mexico Oil Conservation Division address is 2040 S. Pacheco, Santa Fe, NM 97504. Their phase pumber is (505) 827-7131.

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Sincerely,



December 21, 2001

Trustee U/T/A dated Aug. 6, 1966 First Nat'l. Bank of Iowa City P. O. Box 1880 Iowa City, Ia. 52244

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Sincerely,



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December 21, 2001

Elizabeth Fisk, Trustee P. O. Box 310 Farmington, NM 87499

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by questions.

Sincerely,

December 21, 2001

William Hall 416 N. Behrend St. Farmington, NM 87401

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**(**505) 827-7131. U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)

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Sincerely,



(505) <del>984</del>-8120 **4**66

December 21, 2001

Mrs. Howard Henderson 5809 N. 24th Place Phoenix, Az. 86016

As required by New Mexico Oil Conservation Division Rules, I am notifying you of the following non-standard location for a well. This letter is a notice only. No action is needed unless you have questions or objections.

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U.S. Postal Service
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questions.

Sincerely,

Brian Wood

Henderson 5869 N. 24th Pl. Plant Az SECH



466

December 21, 2001

Navajo Bible Missionary Church P. O. Box 1655 Farmington, NM 87499

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Sincerely,

Brian Wood

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December 21, 2001

Lester Cisneros NM State Highway Dept. P. O. Box 1149 Santa Fe, NM 87504-1149

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Sincerely,

466

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Julia Satterly P. O. Box 448 Wadsworth, II. 60083

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Sincerely,

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December 21, 2001

Arnette Small 2516 Sinbad Rd. Dodgeville, Wi. 53533

As required by New Mexico Oil Conservation Division Rules, I am notifying you of the following non-standard location for a well. This letter is a notice only. No action is needed unless you have questions or objections.

Richardson Operating Co. is applying to drill its RPC 17 #4 gas well. The minimum distance from a Pictured Cliffs gas well to a quarter section line is 660'. Due to surface conditions, the well is 562' from the south line of the section, or 98' less than the standard minimum. Thus, it is a non-standard location. The proposed well is 2,863' from the closest Pictured Cliffs producer (Richardson's White #1 well). See attached map for more details.

Well Name: RPC 17 #4

Total Depth: 1,150'

Proposed Producing Zone: Pictured Cliffs sandstone

Acreage Dedication: 160.00 acres (southeast quarter of Section 17)

Location: 562' FSL & 1392' FEL Sec. 17, T. 29 N., R. 13 W.,

San Juan County, NM on a private lease

<u>Approximate Location:</u> ≈1/4 air mile southwest of Farmington, NM <u>Applicant Name:</u> Richardson Operating Co. (303) 830-8000

Applicant's Address: 1700 Lincoln St., Suite 1700, Denver, Co. 80203

<u>Submittal Information</u>: Application for a non-standard location will be filed with the NM Oil Conservation Division. If they determine the application complies with the applicable regulations, then it will be approved. The New Mexico Oil Conservation Division address is 2040 S. Pacheco, Santa Fe, NM <u>87504 Their phone number is</u> (505) 827-7131.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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questions.

Sincerely,

Brian Wood

(Domestic Mail Only; No Insurance Coverage Provided)

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