



# PHILLIPS PETROLEUM COMPANY

FARMINGTON, NEW MEXICO 87401  
5525 HWY. 64 NBU 3004

December 27, 1999

Oil Conservation Division  
State of New Mexico  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Attn: Mr. Michael E. Stogner  
Chief Hearing Officer/Engineer

RE: APPLICATION FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX LOCATION  
SAN JUAN 30-5 UNIT #265 WELL  
E/2 SECTION 10-30N-5W  
RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Stogner:

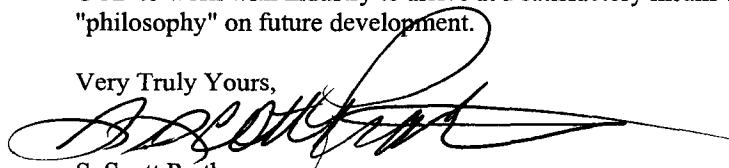
Thank you for the prompt attention and reply to our application of December 17, 1999 related to the captioned. By your letter of December 23, 1999, our application has been denied based on the fact that Phillips had previously applied for and received approval to drill the #222 well at an orthodox location in 1990, however the APD was rescinded in 1992 by the BLM, due to the well not being drilled.

Upon receipt of your letter, I visited with our Drilling Supervisor and inquired as to the circumstances surrounding why the location for the #265 was moved from the previous orthodox location of the #222 well. He advised that although the previous location was approved, the circumstances have changed since that time. The U.S. Forest Service has noted to us that they would prefer that we not drill at that particular location. Further they will not grant us access to the previous location due to erosion concerns related to construction of a location and roads/pipeline routes.

Since receiving your letter, we have conferred with the Forest Service and obtained a letter from them evidencing their position. In light of this, we respectfully request that you please incorporate this information into the review process and reconsider the previous denial of this application. Phillips realizes that careful deliberation was given to our application the first time around and apologizes for not being more definitive in stating our reasons for requesting approval of the unorthodox location. Unfortunately, it appears that BLM/Forest Service intervention is becoming more of a norm rather than an exception. For your benefit, I am enclosing our previous application, accompanying information and the Forest Service letter.

We sincerely thank you for your patience and understanding in this matter and appreciate the efforts of the OCD to work with industry to arrive at a satisfactory means to address the Federal Governments' "philosophy" on future development.

Very Truly Yours,

  
S. Scott Prather  
Senior Landman  
San Juan Area



Oil Division

# United States Department of the Interior

TAKE  
PRIDE IN  
AMERICA

JAN 10 37

BUREAU OF LAND MANAGEMENT  
Farmington Resource Area  
1235 Laplata Highway  
Farmington, New Mexico 87401

IN REPLY REFER TO:  
SF-078997 (WC)  
3162.3-1.0 (019)

JAN. 9 1992

Phillips Petroleum Company  
5525 Highway 64 NBU 3004  
Farmington, NM 87401

Gentlemen:

Enclosed is your Application for Permit to Drill (APD) well No. 222 San Juan 30-5 Unit, NE $\frac{1}{4}$  Section 10, T. 30 N., R. 5 W., Rio Arriba County, New Mexico, lease SF-078997. The subject APD is rescinded and returned due to drilling not being commenced within one year of the approval date.

You are required to request surface rehabilitation instructions from this office if construction activities occurred on the referenced drill site. If this office does not receive comment within 30 days, we will presume that no construction occurred and proceed accordingly. Later discovery that construction activities have in fact occurred, may result in assessment of liquidated damages.

Sincerely,

/s/ John L. Keller

John L. Keller  
Chief, Branch of Mineral Resources

1 Enclosure

cc:

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

## ABANDONED LOCATION

RECEIVED  
JAN 10 1992  
OIL CON. DIV. 1  
DIST. 3

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL, DEEPEN, OR PLUG BACK

a. TYPE OF WORK DRILL ☒ DEEPEN ☐ PLUG BACK ☐

b. TYPE OF WELL OIL WELL ☐ GAS WELL ☒ OTHER ☐ SINGLE ZONE ☒ MULTIPLE ZONE ☐

c. NAME OF OPERATOR Phillips Petroleum Company

d. ADDRESS OF OPERATOR 300 W. Arrington, Suite 200, Farmington, N.M. 87401

e. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.)  
At surface Unit H, 1831' FNL & 816' FEL

f. At proposed prod. zone Unit H, 1831' FNL & 816' FEL

g. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE

h. DISTANCE FROM PROPOSED LOCATION TO NEAREST PROPERTY OR LEASE LINE, FT. (Also to nearest drig. unit line, if any) 816' FEL

i. DISTANCE FROM PROPOSED LOCATION TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 1325' from #73

j. ELEVATIONS (Show whether DT, RT, GR, etc.) This action is subject to technical and procedural review pursuant to 43 CFR 3165.3 and appeal pursuant to 43 CFR 3165.4.  
6711' (GL Unprepared)

k. PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH
12-1/4"	9-5/8"	36#, K-55	250'
8-3/4"	7"	23#, K-55	3413'
6-1/8"	5-1/2"	15.5# or 23#	3313'-3505'

l. LEASE DESIGNATION AND SERIAL NO. SF-078997

m. IF INDIAN, ALLOTTEE OR TRIBE NAME

n. UNIT AGREEMENT NAME San Juan 30-5 Unit

o. FARM OR LEASE NAME

p. WELL NO. 222

q. FIELD AND POOL, OR WILDCAT Basin Fruitland Coal Gas

r. SEC. T., R., M., OR B.E. AND SURVEY OR AREA

s. Sec. 10, T-30-N, R- 5-W

t. COUNTY OR PARISH Rio Arriba

u. STATE NM

v. NO. OF ACRES ASSIGNED TO THIS WELL 320 Ac E/2 of Section

w. ROTARY OR CABLE TOOLS Rotary

x. APPROX. DATE WORK WILL START Upon Approval

DRILLING OPERATIONS AUTHORIZED ARE SUBJECT TO COMPLIANCE WITH ATTACHED "GENERAL QUANTITY OF CEMENT"

\*If the coal is cleated a 5-1/2", 23#, P-110 liner will be run in the open hole without being cemented.

\*If the coal is not cleated the well will be stimulated and a 5-1/2", 15.5#, J-55 liner will be run without being cemented.

RECEIVED  
DEC 07 1990  
OIL CON. DIV.  
DIST 2

Mud Program and BOP Equipment: See Attached

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen or plug back, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

34. SIGNED L.M. Sanders TITLE Supv. Regulatory Affairs DATE 6/16/90

(This space for Federal or State office use)

PERMIT NO. APPROVAL DATE

APPROVED BY CONDITIONS OF APPROVAL, IF ANY: TITLE DATE

*af*

NMOCD

NOV 27 1990  
John L. Keller  
FOR AREA MANAGER

APPROVED  
AS AMENDED

Submit to Appropriate  
District Office  
State Lease - 4 copies  
Fee Lease - 3 copies

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-102  
Revised 1-1-89

OIL CONSERVATION DIVISION

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88240

P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88210

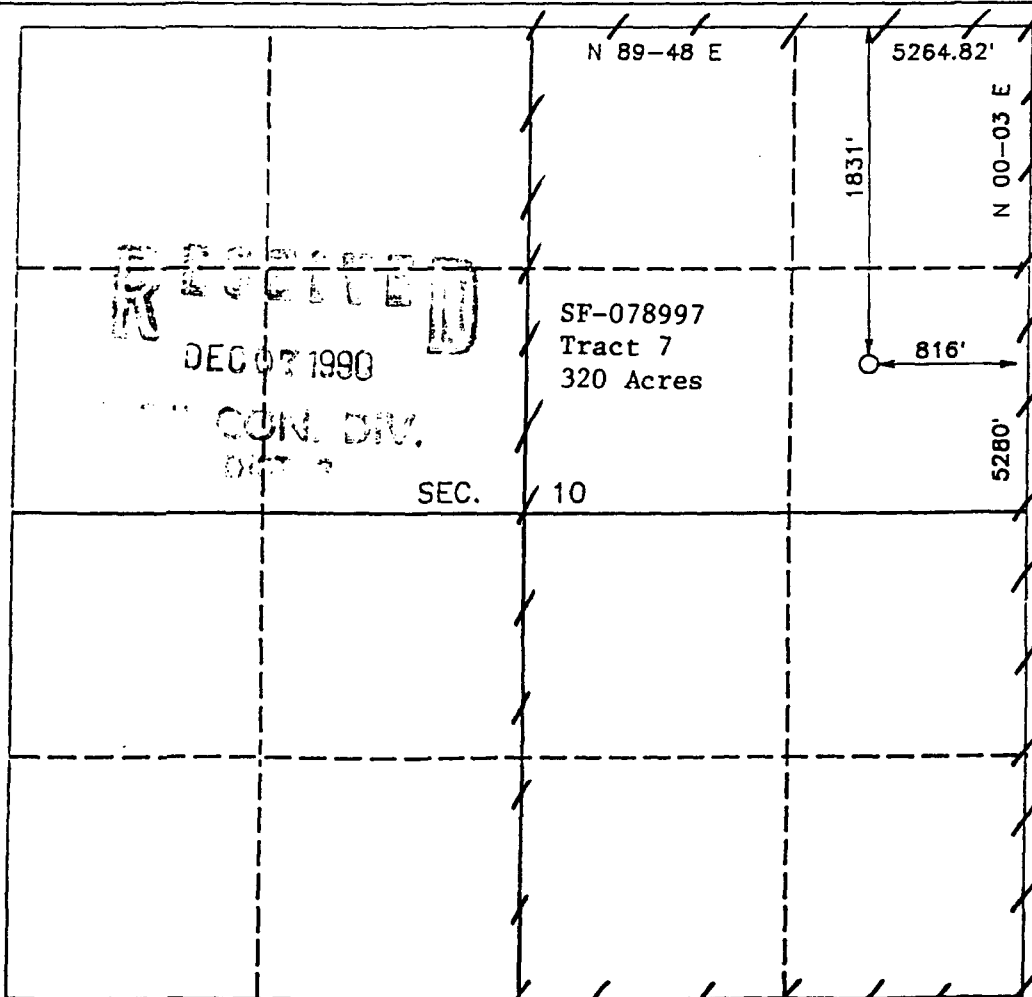
DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410

WELL LOCATION AND ACREAGE DEDICATION PLAT

All Distances must be from the outer boundaries of the section

Operator <b>PHILLIPS PETROLEUM</b>			Lease <b>SAN JUAN 30-5 UNIT</b>		Well No. <b>222</b>
Unit Letter <b>H</b>	Section <b>10</b>	Township <b>T.30 N.</b>	Range <b>R.5 W.</b>	County <b>RIO ARriba COUNTY</b>	
Actual Footage Location of Well: <b>1831</b> feet from the <b>NORTH</b> line and <b>816</b> feet from the <b>EAST</b> line					
Ground level Elev. <b>6711</b>	Producing Formation <b>Fruitland</b>		Pool <b>Basin Fruitland Coal</b>		Dedicated Acreage: <b>320</b> Acres

1. Outline the acreage dedicated to the subject well by colored pencil or hatchure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interest of all owners been consolidated by communization, unitization, force-pooling, etc.?  
☒ Yes ☐ No If answer is "yes" type of consolidation Unitization  
If answer is "no" list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary).  
No allowable will be assigned to the well until all interests have been consolidated (by communization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interest, has been approved by the Division.



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

Signature  
*L.M. Sanders*  
Printed Name  
**L.M. Sanders**  
Position  
**Supv. Regulatory Affairs**  
Company  
**Phillips Petroleum Co.**  
Date  
*6/16/90*

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 is true and correct to the best of my knowledge and belief.

Date Surveyed  
**MAY 19 1990**  
Signature  
*R. Howard Daggett*  
Professional Surveyor  
**R. HOWARD DAGGETT**  
Certificate No.  
**9679**  
Registered Professional  
Land Surveyor



United States  
Department of  
Agriculture

Forest  
Service

Southwestern Region 3  
Carson National Forest  
Jicarilla Ranger District

664 East Broadway  
Bloomfield, New Mexico 87413  
505-632-2956  
FAX 505-632-3173

**File Code: 2820**

**Date: 12/28/99**

Scott Prather  
Phillips Petroleum  
5525 Highway 64, NBU 30040  
Farmington, NM 87401

**RE: Unorthodox location for well: San Juan 30-5 Unit #265**

Dear Mr. Prather,

The Jicarilla Ranger District, Carson National Forest is requesting you apply for an unorthodox location as follows, as discussed by Richard Allred of your company and Camela Hooley of this office:

**San Juan 30-5 Unit #265, T30N R5W Sec.10, 1840'FNL/2510'FEL**

The mineral operator is required to comply with applicable regulations such as the Endangered Species Act and the Archeological Resources Protection Act under 36CFR228.112(c). The operator is also required under 36CFR228.108(c) to minimize or prevent damage to surface resources. The Carson National Forest Management Plan states that surface resource impacts will be minimized when administering mineral resources.

Prevention of unnecessary resource damage requires that the location be unorthodox. I understand that an orthodox location had been approved in the past (then called the #222), however, by locating the well at the unorthodox location above, the surface impacts will be greatly reduced. The access road would be reduced from approximately 4500' to about 900'. The well will also be located in the sagebrush drainage bottom instead of opening up a new bench that is used as a wildlife security and bedding area. Also please note that the previous approval for the #222 has expired.

Thank you for your cooperation in this matter.

Mark Catron  
District Ranger



Caring for the Land and Serving People

Printed on Recycled Paper





T-30-N, R-5-W

FOREST

BOUNDARY

Canyon

Fragua

Canyon

Lopez

PIPELINE

MANUEL

Shale Tank

