

CDX Gas, LLC 4801 N. Butler Avenue, Suite 2000 Farmington, NM 87401 Main: 505-326-3003 Fax: 505-325-4007

05.November.2004

Mr. William Jones
New Mexico Oil Conservation Division
Engineering Bureau
1220 So. St. Francis Drive
P.O. Box 6429
Santa Fe, New Mexico 87505

RE: Application for Exception to Rule 303-A
Downhole Commingling
Jicarilla Apache Tribal 151 #8F
API No. 30-0397-29204
Basin Dakota / WC Mancos
2600' FNL, 1215' FEL, Unit H Sec3-T26N-R5W
Rio Arriba County, New Mexico

Dear Mr. Jones;

CDX RIO, LLC hereby request administrative approval to downhole commingle production from the Basin Dakota and WC Mancos Pools in the above well.

The 151 #8F well will be drilled and the Gallup member of the Mancos Pool will be completed with the Dakota.

The Gallup is marginal in the area and not substantial enough to justify drilling a new well, but commingling with Dakota production through an existing wellbore can capture the additional reserves. Adding the Gallup production will have no detrimental effects and the fluids have no abnormal components that would prohibit commingling or promote the creation of emulsions or scale.

As an analogy the Southwest offset well Jicarilla 3E (NE/NW Sec 8, T26N, R5W) and Northeast offset well Jicarilla 151 #5 (SE/NW Sec 8, T26N, R5W) are all less than 1.5 miles and are currently commingled down hole in the Gallup and Dakota. These wells have been downhole commingled and producing for many years with no production problems or loss of value.

CDX RIO, LLC has 100% working interest in all zones of interest in the captioned well, however ExxonMobile has a overriding interest and will be notified by copy of this application by certified mail, return receipt requested. CDX is the only operator / working interest owner in all formations.

When the Dakota and Gallup are completed they will be isolated and separately tested thru tubing. The subtraction method will be used to determine the new allocation for the commingled production.

Estimated production from the Dakota is 150 mcfd and 1 bopd, from the Gallup 58 mcfd and 0 bopd (using the analogy offset data). New allocations should be similar to the offset data and is estimated at

Dakota Oil 100% Gas 72% Gallup Oil 0% Gas 28%

Attached to aid in your review are plats showing the location of the well and offset wells in the same formation, a recent production plot for the commingled zones in the analogy wells (Jicarilla #3E and Jicarilla 151 #4) and historical plots for the Gallup and Dakota production, and form C-102 showing the location and spacing units. Also included is a cross section between the NE and SW offset wells indicating the continuity of the Gallup between the wells.

This spacing unit is located on an Indian lease (Jicarilla Apache Tribal #151) and a copy of this application package will be sent to the BLM / Jicarilla Tribe requesting their consent.

Should have any question concerning this application please contact the undersigned at (505) 326-3003.

Sincerely

Robert Lemmons
Drilling / Operations Engineer
CDX GAS, LLC
505-326-3003 ext 2820

rob.lemmons@cdxgas.com

cc BLM, Farmington
Rich Corcoran, CDX Land
R. Johnston, CDX Op Mgr.
Fred Vigil, Jicarilla Oil & Gas Admin.
ExxonMobile, Land

District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico

Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION

1220 South St. Francis Dr.

Santa Fe, NM 87505

Form C-102

Revised June 10, 2003

Submit to Appropriate District Office

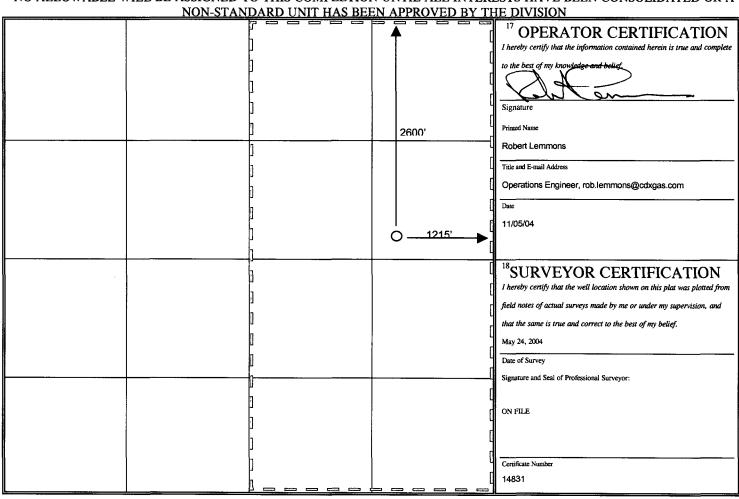
State Lease - 4 Copies

Fee Lease - 3 Copies

 \square AMENDED REPORT

		WE	ELL LO	CATION	N AND ACE	REAGE DEDIC	CATION PL	AT			
¹ API Number				² Pool Code		³ Pool Name					
30-039-29204				71599		BASIN DAKOTA					
Property Code				5 Property	operty Name				' Well Number		
			JICARILLA 151					8F			
OGRID No.			Operator Name				* Elevation				
222374				CDX RIO, LLC					7216' GR		
					¹⁰ Surface	Location					
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/W	est line	County	
н	3	26N	R5W		2600	NORTH	1215	EAS	ST	RIO ARRIBA	
			¹¹ Bo	ttom Hol	e Location I	f Different Fro	m Surface				
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/W	est line	County	
¹² Dedicated Acre	Joint or	r Infill 14 Co	nsolidation	Code 15 Or	der No.						

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A



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State Lease - 4 Copies

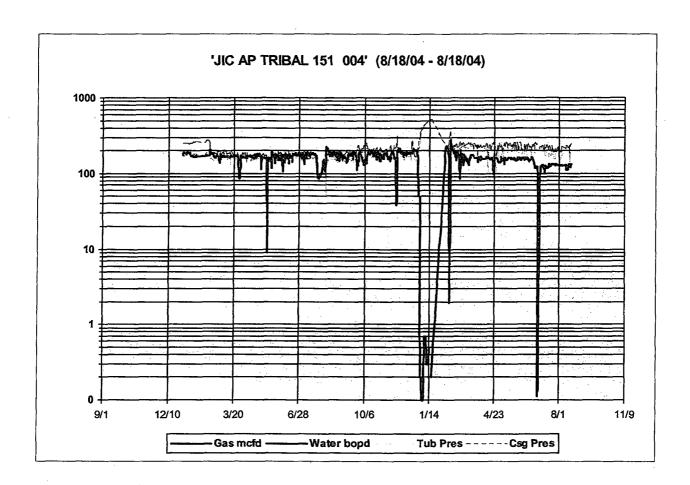
Fee Lease - 3 Copies

87505 AMENDED REPORT
WELL LOCATION AND ACREAGE DEDICATION PLAT

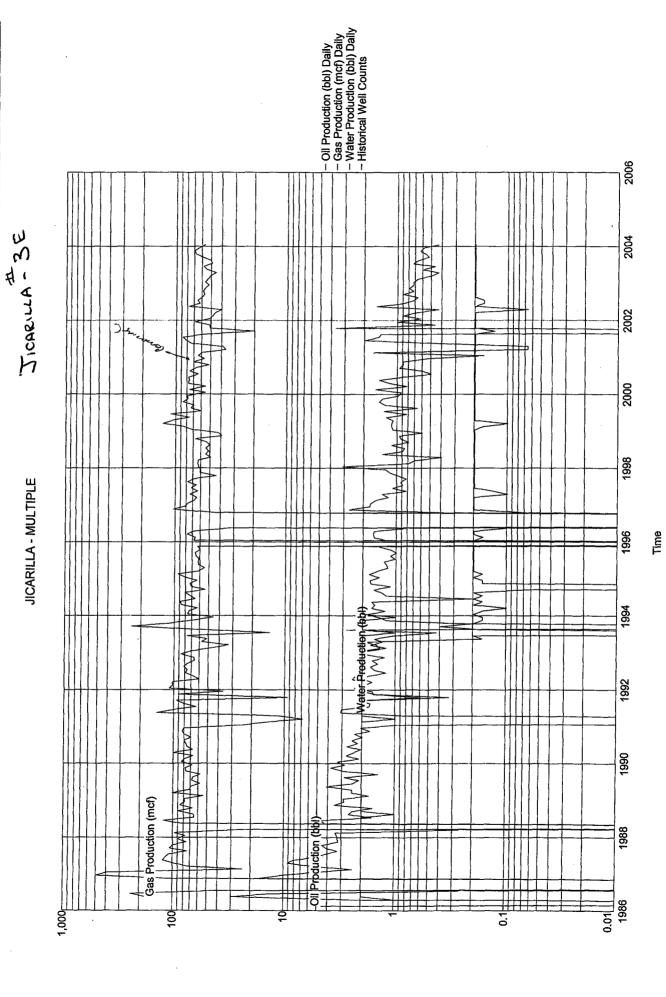
¹ API Number 30-039-29204				² Pool Code 97232		³ Pool Name WC BASIN MANCOS					
¹ Property		⁵ Property Name JICARILLA 151				' Well Number 8F					
OGRID 1 222374		⁸ Operator Name CDX RIO, LLC						' Elevation 7216' GR			
	-				¹⁰ Surface	Location					
UL or lot no. H	Section 3	Township 26N	Range R5W	Lot Idn	Feet from the 2600	North/South line NORTH	Feet from the 1215	East/West EAST	line County RIO ARRIBA		
			11 Bo	ttom Hol	e Location I	f Different Fro	m Surface				
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West	line County		
Dedicated Acres	Joint or	r Infill 14 Co	nsolidation	Code 15 Or	der No.				<u> </u>		

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NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION **OPERATOR CERTIFICATION** I hereby certify that the information contained herein is true and complete Signature Printed Name 2600' Robert Lemmons Title and E-mail Address Operations Engineer, rob.lemmons@cdxgas.com Date 11/05/04 _1215' 18SURVEYOR 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 belief. May 24, 2004 Date of Survey Signature and Seal of Professional Surveyor: ON FILE Certificate Number 14831

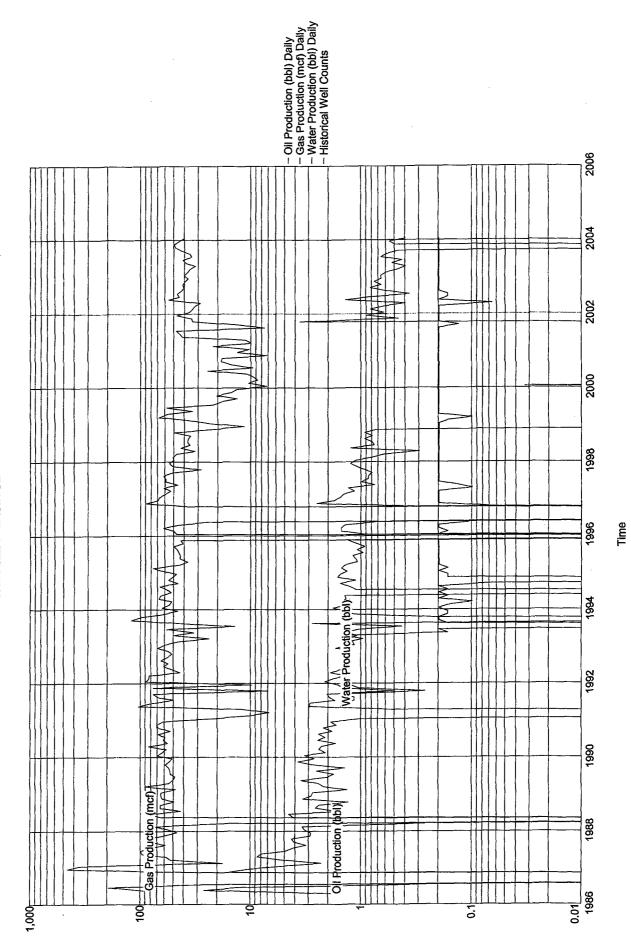


Lease Name: JICARILLA County, State: RIO ARBA, NM Operator: CORDILLERA ENERGY INCORPORATED Field: MULTIPLE Reservoir: MULTIPLE Location:



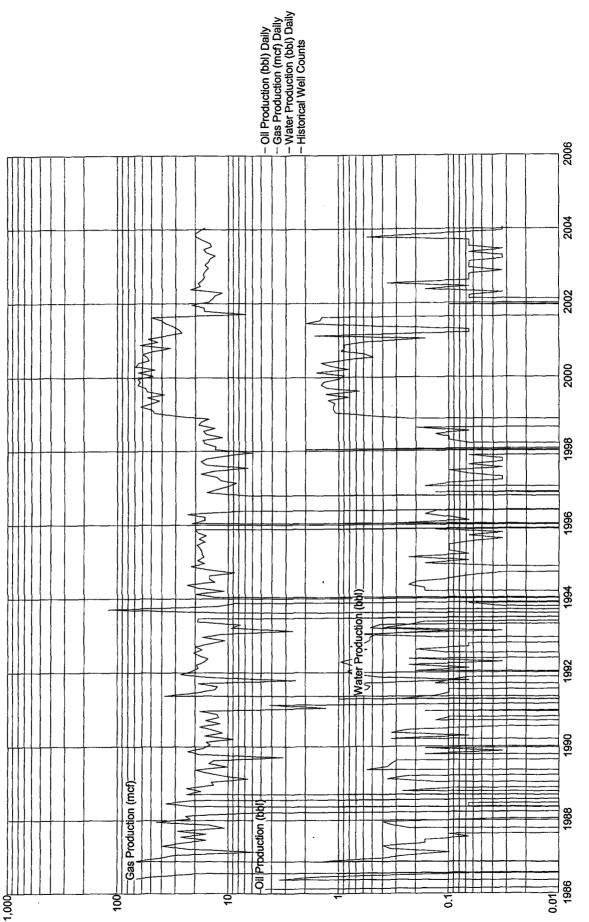
Lease Name: JICARILLA County, State: RIO ARBA, NM Operator: CORDILLERA ENERGY INCORPORATED Field: BASIN Reservoir: DAKOTA Location: 8 26N 5W NW SE NW

JICARILLA - BASIN 3E



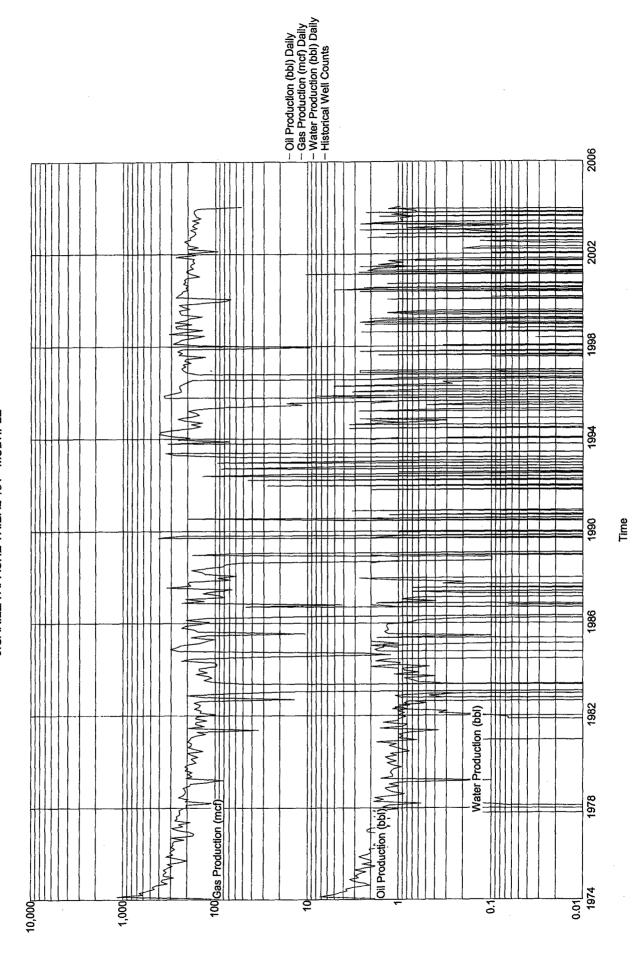
Lease Name: JICARILLA County, State: RIO ARBA, NM Operator: CORDILLERA ENERGY INCORPORATED Field: TAPACITO Reservoir: GALLUP Location: 8 26N 5W NW SE NW

JICARILLA - TAPACITO 3E



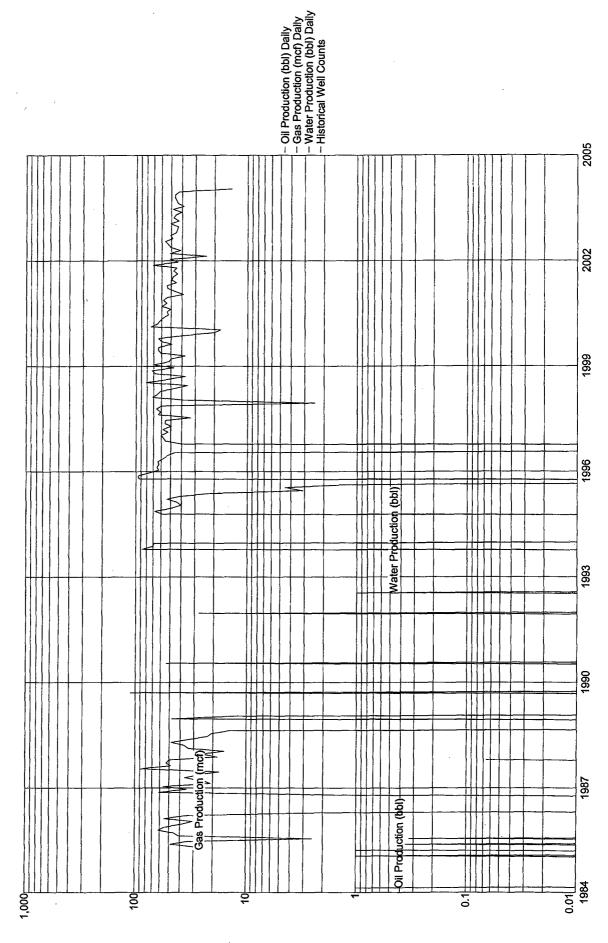
Lease Name: JICARILLA APACHE TRIBAL 151
County, State: RIO ARBA, NM
Operator: CDX RIO LIMITED LIABILITY CORPORATIO
Field: MULTIPLE
Reservoir: MULTIPLE
Location:

JICARILLA APACHE TRIBAL 151 - MULTIPLE



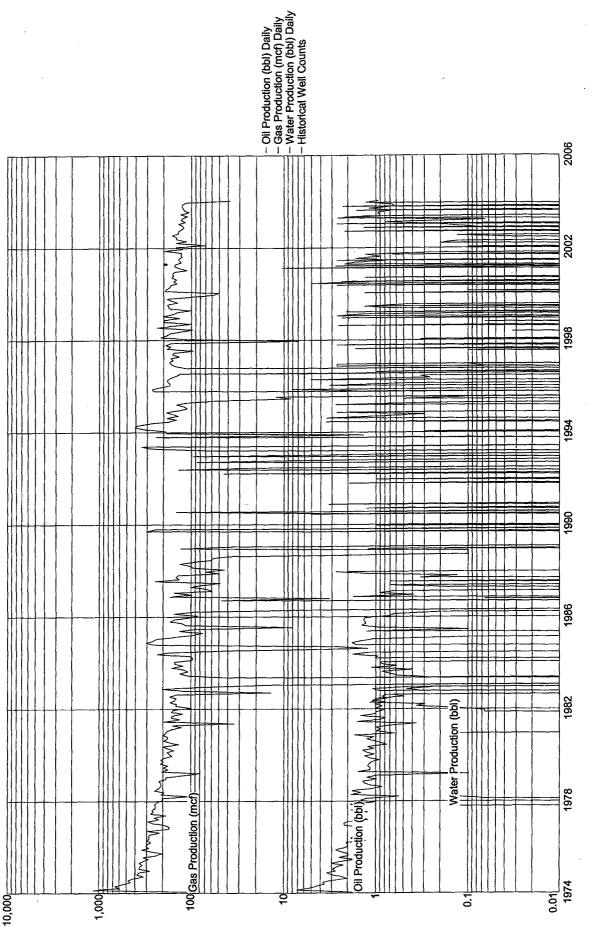
Lease Name: JICARILLA APACHE TRIBAL 151
County, State: RIO ARBA, NM
Operator: CDX RIO LIMITED LIABILITY CORPORATIO
Field: B S MESA
Reservoir: GALLUP
Location: 3 26N 5W SW NE NW

JICARILLA APACHE TRIBAL 151 - B S MESA 4



Lease Name: JICARILLA APACHE TRIBAL 151
County, State: RIO ARBA, NM
Operator: CDX RIO LIMITED LIABILITY CORPORATIO
Field: BASIN
Reservoir: DAKOTA
Location: 3 26N 5W NE NW

JICARILLA APACHE TRIBAL 151 - BASIN 4



Williams Energy Services SUMMARY OF MOST RECENT GAS ANALYSES

Station ID:

32991

Station Name: JIC APACHE TR151

0004

Station Name:	JIC A	PACHE TR151	0004					
Analysis No.:		243335	249619	267906	283743	290185	308053	320580
Analysis Sourc	e:	32991	32991	32991	32991	32991	32991	32991
Lab Identifier	:	K320	K654	K587	K280	K565	K357	K030
Sample From Da	te:	09/01/98	02/05/99	02/29/00	02/28/01	07/19/01	09/06/02	07/31/03
Sample To Date	:	09/01/98	02/05/99	02/29/00	02/28/01	07/19/01	09/06/02	07/31/03
Analyzed Date:		09/02/98	02/09/99	03/06/00	03/01/01	07/20/01	09/09/02	08/04/03
Effective Date	:	10/01/98	03/01/99	03/06/00	03/02/01	07/25/01	09/13/02	08/05/03
		Number 1	Number 2	Number 3	Number 4	Number 5	Number 6	Number 7
Components		Mol %	Mol %	Mol %	Mol %	Mol %	Mol %	Mol %
Methane	C1	83.8071	83.8060	83.7231	83.9811	81.9180	82.0721	81.9000
Ethane	C2	9.4019	8.9450	9.5719	9.4869	10.5040	10.4609	10.3750
Propane	C3	2.9200	2.2700	3.2410	3.2410	3.7310	3.7010	3.6720
Iso-butane	IC4	0.5670	0.4860	0.5520	0.5300	0.6150	0.5990	0.6140
Normal-butane	NC4	0.8890	0.8500	0.8910	0.8420	1.0000	0.9610	0.9910
Iso-pentane	IC5	0.3660	0.4560	0.3700	0.2980	0.4020	0.3930	0.4450
Normal-pentane	NC5	0.2370	0.3310	0.2870	0.2070	0.2760	0.2730	0.3110
Hexanes	C6	0.7630	1.8580	0.3610	0.3410	0.6330	0.6360	0.7530
Heptanes	C7	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Octanes	C8							
Nonanes	C9	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Decanes	C10	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Nitrogen	N2	0.2590	0.1780	0.2450	0.2240	0.2530	0.2620	0.2270 (
Carbon Dioxide	CO2	0.7900	0.8200	0.7580	0.8490	0.6680	0.6420	0.7120
Carbon Monoxide	e co	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hydrogen Sulfid	le H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Helium	HE	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Specific Gravit	Ϋ́	0.6915	0.7142	0.6852	0.6810	0.7040	0.7023	0.7077
Ideal Specific	Grav:	0.6896	0.7120	0.6833	0.6792	0.7019	0.7002	0.7056
Dry BTU :		1203.6287	1239.2647	1194.8810	1186.4673	1226.2972	1224.1852	1231.3699
Pressure Base:		14.7300	14.7300	14.7300	14.7300	14.7300	14.7300	14.7300
Ideal BTU:		1199.7875	1235.0454	1191.1267	1182.7950	1222.2009	1220.1158	1227.2155
Z-Factor:		0.9966	0.9966	0.9966	0.9966	0.9966	0.9966	0.9966
GPM								
Ethane	C2	2.515	2.392	2.560	2.536	2.808	2.796	2.773
Propane	C3	0.805	0.626	0.893	0.892	1.027	1.019	1.011
Iso-butane	IC4	0.185	0.159	0.181	0.173	0.201	0.196	0.201
Normal-butane	NC4	0.280	0.268	0.281	0.265	0.315	0.303	0.312
Iso-pentane	105	0.134	0.167	0.135	0.109	0.147	0.144	0.163
Normal-pentane	NC5	0.086	0.120	0.104	0.075	0.100	0.099	0.113
Hexanes	C6	0.333	0.811	0.158	0.149	0.276	0.277	0.328
Heptanes	C7	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Octanes	C8	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Nonanes	C9	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Decanes	C10	0.000	0.000	0.000	0.000	0.000	0.000	0.000 (

TZEN-RSW BAKOTA

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Bottomhole pressure data.

I hereby certify that the information above is true and c	omplete to the best of my knowledge an	d belief.	
SIGNATURE SIGNATURE	TITLE Operations Engineer	_DATE	11/05/04
TYPE OR PRINT NAME Robert Lemmons	TELEPHONE NO. (505) 326-3003		
E-MAIL ADDRESS rob.lemmons@cdxgas.com			