



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

June 27, 2003

Richardson Operating Company
501 Airport Drive – Suit 119
Farmington, New Mexico 87401

Attention: Paul Lehrman
plehrman@digii.net

Administrative Order NSL-4907

Dear Mr. Lehrman:

Reference is made to the following: (i) your application submitted to the New Mexico Oil Conservation Division ("Division") on May 21, 2003 (***administrative application reference No. pKRV0-314336512***); and (ii) the Division's records in Aztec and Santa Fe, including the files in Division Cases No. 11569 and 11680: all concerning Richardson Operating Company's ("Richardson") request for an unorthodox infill coal gas well location for its existing ROPCO "15" GW/PC Well No. 2 (**API No. 30-045-29383**), located 476 feet from the South line and 1800 feet from the East line (Unit O) of Section 15, Township 29 North, Range 13 West, NMPM, Basin-Fruitland Coal (Gas) Pool (**71629**), San Juan County, New Mexico.

This application has been duly filed under the provisions of: (i) Rule 7 (b) of the "*Special Rules and Regulations for the Basin-Fruitland Coal Gas Pool*," as promulgated by Division Order No. R-8768, as amended; (ii) Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission ("Commission") in Case No. 12119 on August 12, 1999; and (iii) Rule 1207.A (2), revised by Division Order No. R-11205, issued by the Commission in Case No. 12177 on June 17, 1999.

According to the Division's well records the above-described ROPCO "15" GW/PC Well No. 2 was initially drilled in late 1996 and completed at an unorthodox gas well location (approved by Division Orders No. R-10624, issued in Case No. 11569 on July 22, 1996, and R-10624-A, issued in Case No. 11680 on January 13, 1997) within the West Kutz-Pictured Cliffs Pool (**79680**) within a standard 160-acre gas spacing unit comprising the SE/4 of Section 15.

It is our understanding that Richardson now indents to recomplete the ROPCO "15" GW/PC Well No. 2 to include the Basin-Fruitland Coal (Gas) Pool; however, pursuant to Rule 7 (a) (1) of the Basin-Fruitland coal gas special pool rules the location of this infill coal gas well is considered to be unorthodox for the existing 320-acre stand-up gas spacing unit comprising the E/2 of Section 15.

This unit is currently dedicated to Richardson's ROPCO "15" GW A-PC/B-FC Well No. 1 (API No. 30-045-29407), located at standard coal gas well location 2171 feet from the North line and 775 feet from the East line (Unit H) of Section 15.

By the authority granted me under the applicable provisions of these special pool rules the above-described unorthodox infill coal gas well location for the ROPCO "15" GW/PC Well No. 2 is hereby approved.

Further, Richardson is hereby authorized to simultaneously dedicate production attributed to the Basin-Fruitland Coal (Gas) Pool from both its ROPCO "15" GW A-PC/B-FC Well No. 1 and ROPCO "15" GW/PC Well No. 2.

Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

Sincerely,



Lori Wrotenbery
Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Aztec