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NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

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



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] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [PC-Pool Commingling] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response [1] **TYPE OF APPLICATION** - Check Those Which Apply for [A] JUN 22 2007. Location - Spacing Unit - Simultaneous Dedication NSL NSP SD Oil Conservation Division 1220 S. St. Francis Drive Check One Only for [B] or [C] Santa Fe, NM 87505 Commingling - Storage - Measurement ☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery ☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR [D]Other: Specify [2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners [A]Offset Operators, Leaseholders or Surface Owner [B] [C]Application is One Which Requires Published Legal Notice Notification and/or Concurrent Approval by BLM or SLO [D]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, [E][F] Waivers are Attached [3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE. [4] **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.



P. O. Box 640 Aztec, NM 87410 (505) 634-4222 (505) 634-4205 (fax) Heather.riley@williams.com

June 20, 2007

Mark E. Fesmire NEW MEXICO OIL CONSERVATION DIVISION 1220 South Saint Francis Drive Santa Fe, NM 87505

Re: Request for Administrative approval for non-standard Dakota Location

Rosa Unit #184C API # (Not assigned yet) NE4 Sec. 34, T31N, R5W 845 FNL & 2525' FEL

Dear Mr. Fesmire:

Williams Production Co., LLC, is requesting administrative approval to construct the Rosa Unit #184C as a dual Mesaverde/Dakota with the Dakota being non-standard. Pursuant to Order No. R-10987-B(2), spacing requirements allow for up to 4 Dakota wells in a standard GPU and they shall be located not closer than 660 feet to the outer boundary of the GPU and not closer than 10 feet to any interior quarter or quarter-quarter section line or subdivision inner boundary. Given these requirements, this location is non-standard to the west by 545 feet.

Williams intends to make the well a dual well thereby capturing the reserves from the Dakota with a single well bore. By itself the Dakota in this area is at best very marginal economically and a dual completion helps capture additional reserves from the Dakota that otherwise would not be able to be economically developed. Utilizing a single well bore for a dual completion would also negate the need for additional disturbance of another wellpad, road, and pipeline.

The surface location was picked by considering drainage patterns from the offset Mesaverde wells. In particular, the drainage patterns we are trying to avoid are from the Rosa Unit #184A in the northeast of 34, the Rosa Unit #188A in the northwest of 34, the Rosa Unit #188C in the southwest of 34, and the Rosa Unit #188B in the southwest of 34. See drainage map.

Mark E. Fesmire June 20, 2007 Page 2 of 2

As the Unit Operator of the Rosa Unit, Williams Production is the only offset operator, thereby this proposed non-standard location would not affect any other operators.

The offset unit's working interest and mineral owners to the west are common with the subject unit therefore there are no "affected persons."

Enclosed for your reference are copies of the Participating Area maps for the Mesaverde and Dakota Formations. As you can see, the east half of section 34 is not in a PA, nor is the west half. Both areas are in a PA in the Mesaverde Formation.

The spacing unit for the Mesaverde is the east half and the other Mesaverde wells in the spacing unit are the Rosa Unit #184, #184A and #184B.

The spacing unit for the Dakota is the east half and the only other Dakota well in the spacing unit is the Rosa Unit #55.

Should you have any questions or concerns, please don't hesitate to contact me at the phone numbers listed above. You can also contact Vern Hansen at our Tulsa office at (918) 573-6169.

Regulatory Specialist

Enc.: Plat

Topographic map

Drainage Map

PA Maps (MV & DK)

District I 1625 N. French Dr., Hobbs, NM 88240

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

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

State of New Mexico District II 1301 W. Grand Avenue, Artesia, NM 88210

Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION 1220 South St. Francis Dr.

Form C-102 Revised October 12, 2005 Instructions on back

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

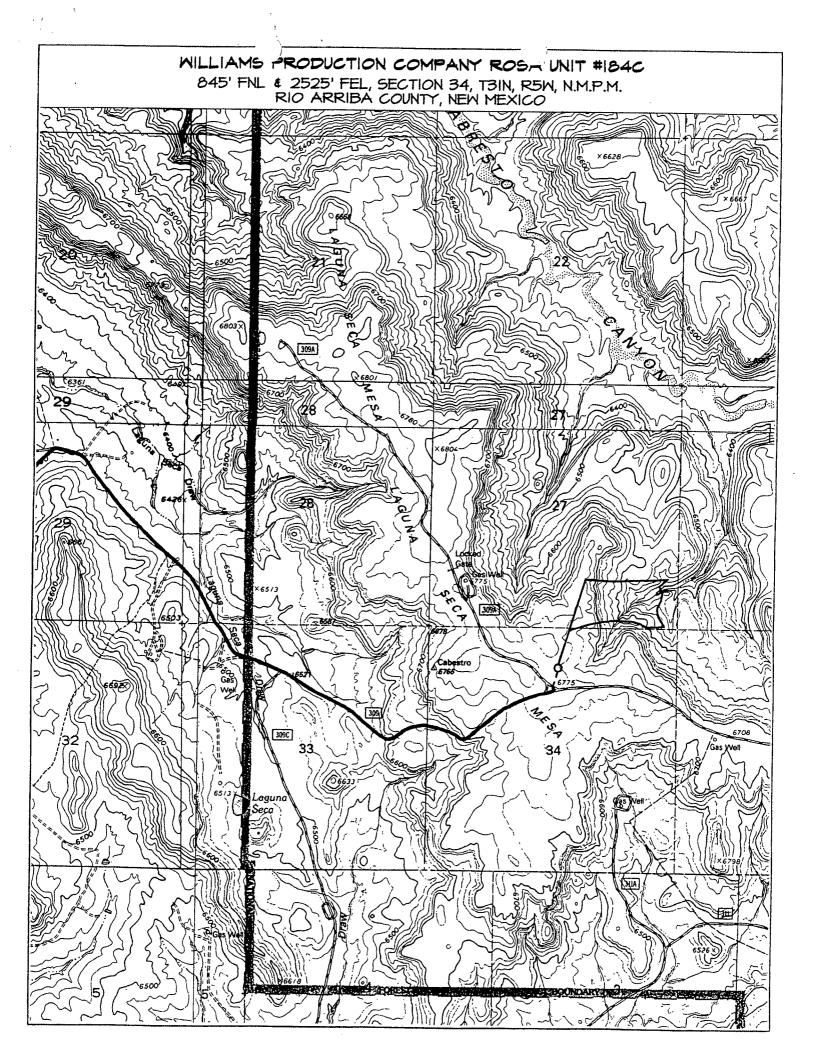
Santa Fe, NM 87505 AMENDED REPORT

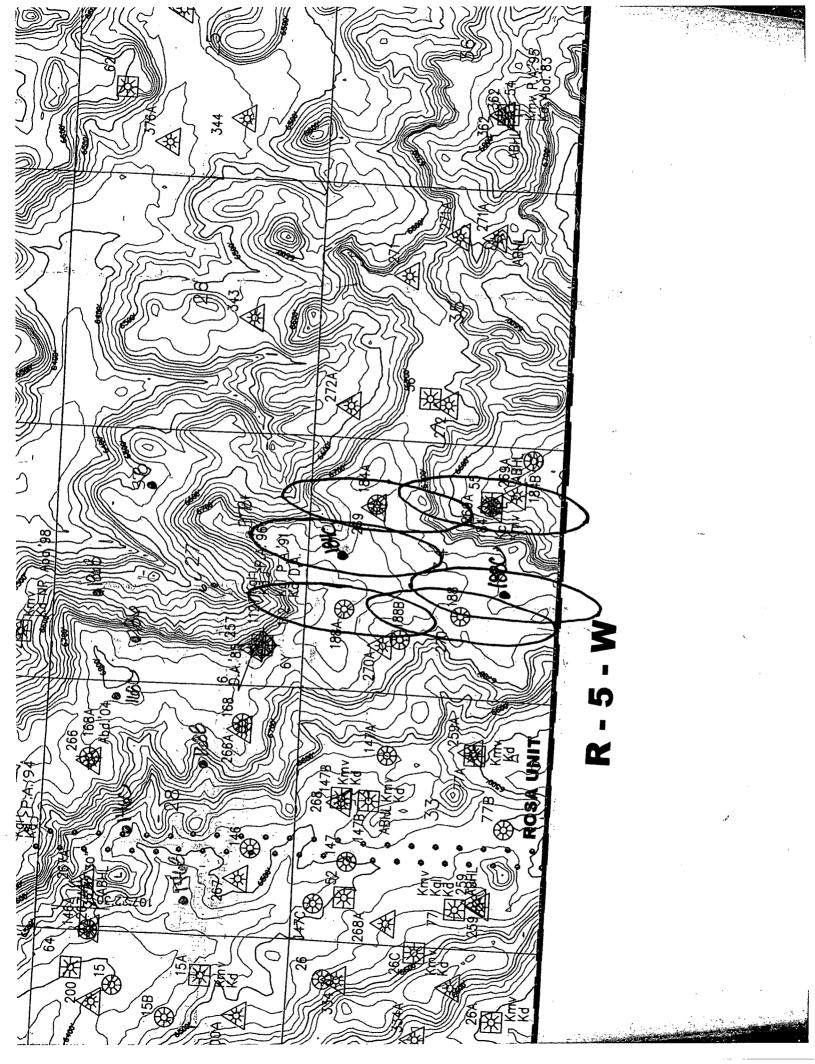
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