



**RICHARDSON PRODUCTION COMPANY**

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October 19, 2000

Mr. Joel Farrell  
Bureau of Land Management  
Farmington Field Office  
1235 La Plata Highway, Suite A  
Farmington, NM 87401

Re: Resource Management Plan Revision

Dear Joel:

This letter is in follow up to our telephone conversation of October 13, 2000. Thank you for explaining that October 16, 2000 is not a firm cutoff date for accepting comments pertaining to the Resource Management Plan. We welcome the opportunity to contribute comments concerning some of the lands being reviewed for the Resource Management Plan Revision.

Since 1997, Richardson Operating Company has been actively drilling and producing Fruitland Coal/Pictured Cliffs wells throughout Townships 29 and 30 North, Range 14 West. Our activity is located in an area targeted by San Juan Coal Company for extension of its underground mining operations. Over the years, Richardson has had numerous discussions and correspondence with the BLM and the coal company regarding multiple-use issues on these lands. The common thread on which the parties now agree is that, it is in everyone's best interest to allow the oil and gas lessee the opportunity to produce and sell natural gas found in the coal seams prior to commencement of mining operations. In addition to insuring safer mining operations, waste is prevented when gas is produced and sold, rather than vented.

To date, Richardson has drilled 31 wells east of San Juan Coal Company's mine. Subject to approval of APD's, we plan to drill an additional 25 wells in 4<sup>th</sup> quarter 2000 through 1<sup>st</sup> quarter 2001. The drilling program is projected to terminate in 2002 when the final 11 wells are drilled.

**BEFORE THE  
OIL CONSERVATION DIVISION**  
Case No. 12734 Exhibit No. A-13  
Submitted By:  
*Richardson Operating Company*  
Hearing Date: November 13, 2001

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In light of the imminent expansion of San Juan's coal mining activity, it is critical that development of the natural gas resource be allowed to proceed without delay in this area. Fortunately, this is not an environmentally sensitive area - it consists primarily of sand and sagebrush. Considering that the surface will be rubblized as it collapses behind the mining operations, our oil and gas operations will have minimal impact on surface disturbance. We are committed to avoiding new surface disturbance whenever reasonably possible, however, Richardson plans to continue to operate in a safe and responsible manner and will continue to bury all pipelines.

In this particular area, time is of the essence. Your assistance is greatly appreciated.

Sincerely,

RICHARDSON OPERATING COMPANY



David B. Richardson  
President

cc: Mr. Steve Henke  
Bureau of Land Management  
Project Manager - RMP  
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