



RICHARDSON OPERATING COMPANY

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January 4, 2001

Mr. Rich Dembowski  
Bureau of Land Management  
Farmington Field Office  
1235 LaPlata Highway  
Farmington, NM 87401

Via Fax and Mail: (505) 599-8997

Re: Applications for Permit to Drill  
Locations Offsetting Underground Coal Mine Area  
San Juan County, New Mexico

Dear Mr. Dembowski:

In our meeting on November 3, 2000, Richardson Operating Company was directed by the BLM to expedite its drilling program in the area offsetting San Juan Coal Company's deep coal lease and future expansion area. We are diligently trying to develop our acreage, and have submitted the following APD's over the last five+ months. They are all still pending BLM approval.

Priority 1:

Well	Location	Date APD Filed
ROPCO 4-1	NENE-Sec 4-29N-14W	10-02-00
ROPCO 4-2	NESE-Sec 4-29N-14W	11-10-00
ROPCO 4-3	NWSW-Sec 4-29N-14W	10-08-00
ROPCO 4-4	NENW-Sec 4-29N-14W	11-23-00
ROPCO 5-4	SWNE-Sec 5-29N-14W	10-28-00
ROPCO 9-4	SENE-Sec 9-29N-14W	08-11-00
WF Federal 27-1	SWNE-Sec 27-30N-14W	10-06-00
WF Federal 27-3	NESW-Sec 27-30N-14W	10-07-00
WF Navajo 14-1	NESE-Sec 14-29N-14W	04-30-00
WF Navajo 23-1	SENE-Sec 23-29N-14W	07-07-00

Priority 2:

Well	Location	Date APD Filed
ROPCO 8-1	NWNE-Sec 8-29N-14W	08-10-00
ROPCO 9-1	NENE-Sec 9-29N-14W	09-21-00
ROPCO 10-1	NWNW-Sec 10-29N-14W	11-25-00

BEFORE THE  
OIL CONSERVATION COMMISSION  
Case No. 12734  
Exhibit # A-19  
Submitted By: Richardson Oper. Co.  
Hearing Date: 01-11-01

Application of Richardson Operating  
Co.  
Record on Appeal, 794.

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Yesterday, Elizabeth Allison informed us that the permits won't be approved until we submit acceptable, revised EA's. Permits West, Inc. has filed our APD's over the last three years, and prior to now, we never experienced approval delays because of the way the EA's were written. To date, Permits West still does not understand what Elizabeth wants. There is nothing environmentally controversial about the area we are developing. It is generally flat, covered with sand and some sage brush.

Most importantly, there is a shortage of available, reliable drillers in the San Juan Basin. We scheduled our driller based on expectations of reasonable APD approvals. We are now in jeopardy of losing the ability to obtain a drilling rig because we can't commit to drilling dates.

Please help us in any way you can to expedite our APD approvals.

Sincerely,

RICHARDSON OPERATING COMPANY



Cathleen Colby  
Land Manager

cc: Brian Wood  
Permits West, Inc.