



March 2, 2000

Ms. Lori Wrotenbery New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Application for Administrative Approval of
Unorthodox Location for Dugan Production Corp's. Carpenter Com # 90
1767' FSL & 280' FWL (NW/4 SW/4)
Unit L, Section 25, T30N, R14W
San Juan County, New Mexico
Basin Fruitland Coal Pool

Dear Ms. Wrotenbery:

Recently, Dugan Production submitted an application to the New Mexico Oil Conservation Division for administrative approval of an unorthodox location (necessitated by topographic conditions) for the Carpenter Com # 90. The application was rejected based on the Oil Conservation Division's opinion that an existing well pad at a standard location was available and suitable for usage by the operator. The Oil Conservation stated that "staking the proposed Carpenter Com. Well No. 90 on an existing well pad would serve to minimize surface resource damage and/or avoid the topographic conditions mentioned" in our original application. Two well bores occupy the existing well pad that the NMOCD was referring to, the producing Carpenter #1 and the plugged and abandoned Carpenter #2.

Dugan Production expressed their concern with the NMOCD's opinion and provided additional information to support the need for the unorthodox location. However, in it's final decision, the NMOCD failed to recognize the following concerns of the operator:

- 1. Topographic problems with the Carpenter #1 and Carpenter #2 well pad.
- 2. Minimizing risk to an existing well bore.
- 3. Minimizing surface resource damage.
- 4. Maximizing efficient development of the Fruitland coal gas resource.

The first concern is that the existing topographic conditions at the Carpenter #1 and Carpenter #2 well pad create difficult operation problems that will be expensive, unnecessary and wasteful to deal with. This well pad is merely a small island of flat terrain (roughly 300-feet in diameter), that is surrounded by a sea of very rough, Bad



Lands type topography. To operate a Fruitland coal well here, a considerable amount of expensive dirt work would be required in order to make the pad useable. The produced water from the well (150 - 250 bls per day) would have to be either pipelined to our gathering system (1/2 mile away) across very rough terrain, or, the access road would have to be improved and graveled (2-miles) in order to provide year round access to haul the produced water to our injection facility (five miles away). Also, a large 3-stage compressor would be required at the well site in order to produce into El Paso's high-pressure pipeline. However, if allowed to build our location at the unorthodox site, a minimal amount of dirt work would be necessary to build the pad and only a short distance (1/4 mile) of pipeline across flat terrain would be needed in order to transport the produced gas and water to our existing, centralized compression and injection facilities.

The second concern of Dugan Production is to minimize risk exposure to the producing, Carpenter #1 well bore (38-years old). The Carpenter #1 was cemented across the deeper, productive Dakota and Gallup zones only. It has a history of shallow casing problems and does not have any cement across the Fruitland coal zone. To locate a coal well within 500-feet of this Dakota producer is a risk that our sound engineering practices will not allow us to willingly take. The well bore could be damaged or lost, the remaining Dakota reserves would be left in the ground and the expense of our frac could be wasted if we were forced to drill and frac the Fruitland coal within close proximity to it. Only careless and reckless engineering would recommend that a Fruitland coal well be drilled and frac'd on this well pad.

Another concern of Dugan Production is to minimize destruction of the wonderful surface resource that this unusual topography provides for the Farmington community. This area referred to as the Cottonwood Wash area being unique and close to town, is a very popular area for outdoors-recreational activities like hiking, bicycling and horseback riding. An employee of Dugan Production that lives close to this area has seen 3 - 4 different cars in the parking lot on a daily basis and as many as 15 - 20 on any given weekend. The primary trail that people use in and out of this area is the access road for the Carpenter #1. As noted earlier, this road would have to be improved to accommodate the water trucks. However, the road is very crooked with several blind corners along its length. Serious safety problems will occur if water trucks, bicycles and horseback riders are forced to share the same road. Also, a large compressor at the head of the wash would destroy the peaceful serenity of this region that many people come to enjoy.

The final concern of Dugan Production is to maximize efficient development of the Fruitland coal gas reserve. The topography of the subject area and our reluctance to put an existing well bore at risk make it difficult to drill our well at the site recommended by the New Mexico Oil Conservation Division. If we are not allowed to drill our Fruitland



coal well at the proposed, unorthodox location we will be forced to take a very close look at the economics and determine if they will justify drilling at the location that the NMOCD is recommending. If they do not, the Fruitland coal gas reserves will not be developed.

It is in the best interest of both the NMOCD and Dugan Production that we maximize efficient development of the Fruitland coal gas and at the same time protect the existing Dakota gas and surface resources in this area. We urge the New Mexico Oil Conservation to review your ruling on our application, recognize our concerns and grant us administrative approval of our unorthodox location.

If you have any questions or need additional information on this matter, please contact me.

Very Sincerely,

Kurt H. Fagrelius Geologist

cc: Mr. Lee Otteni, U.S. Bureau of Land Management, Farmington

Ms. Mary Lou Drywater, U.S. Bureau of Land Management, Farmington

Mr. NeelMcBride, U.S. Bureau of Land Management, Farmington

Mr. Frank Chavez, New Mexico Oil Conservation Division - Aztec

Mr. Michael Stogner, New Mexico Oil Conservation Division - Santa Fe

Ms. Kathy Valdes, New Mexico Oil Conservation Division - Santa F

Mr. Steve Salzman, U.S. Bureau of Land Management, Santa Fe

Mr. Bob Gallagher, New Mexico Oil and Gas Association, Santa Fe



January 27, 2000

Mr. Michael E. Stogner New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Application for Administrative Approval of
Unorthodox Location for Dugan Production Corp's. Carpenter Com # 90
1767' FSL & 280' FWL (NW/4 SW/4)
Unit L, Section 25, T30N, R14W
San Juan County, New Mexico
Basin Fruitland Coal Pool

Dear Mr. Stogner:

Dugan Production submitted an application for administrative approval of an unorthodox location for the Carpenter Com #90 to your office dated January 10, 2000 (Exhibit 1). On January 20, I received a letter back from you, rejecting our application because insufficient information was submitted to justify the drilling of this well at an unorthodox coal gas well location.

In response to your letter and a phone conversation to you on January 20, and a phone call from Mr. Frank Chavez on January 21, I have enclosed the following discussion and exhibits:

- 1. The original Application for Administrative Approval of Unorthodox Location for Dugan Production Corp's. Carpenter Com # 90.
- 2. An enlarged map showing the topography, standard drilling window for the Fruitland coal and the location of the Carpenter #1, #2 and proposed #90.
- 3. Sundry notices and reports for the Carpenter # 1 located in the NE/4 SW/4 of Section 25, T30N, and R14W.
 - a. Sundry on spud, 8-5/8" surface casing and cement.
 - b. Sundry on total depth drilled, 4-1/2" casing and cement.
 - c. Request for Allowable (Form C-104).
 - d. Sundry to repair 4-1/2" casing.
 - e. Production decline curve.
- 4. Sundry notice and report for the Carpenter # 2 located in the NE/4 SW/4 of Section 25, T30N, and R14W.
 - a. Completion report.



- b. Sundry report of plugging and abandonment.
- 5. Map showing traverses made on four different surveys of the subject area.
- 6. An in house memorandum from David Poage, Dugan Production Corp's Landman showing the working interest owners in the
 Fruitland Coal for the lands offsetting the proposed Carpenter Com # 90.
- 7. Offsetting operator/working interest owner map.
- 8. Copies of signed waivers from all affected and offsetting operators /working interest owners.

Exhibit 2. is an enlarged topographic map (200% enlargement of the Youngs Lake NM Quadrangle, scale 1:24,000) that shows the location of the Carpenter #1, Carpenter #2, the orthodox drilling window for a Fruitland coal well in a W/2 proration unit and the proposed Carpenter Com #90 location. The topographic conditions in the general area are very rugged. Within the orthodox drilling window the only site suitable for building a location is already occupied by an older, deeper and producing Dakota well (Carpenter #1) and a plugged and abandoned Pictured Cliffs well (Carpenter #2).

The Carpenter #1, formerly the Carpenter Gas Unit "B" #1 located 1730' FSL and 1800' FWL of Section 25, T30N and R14W was drilled and completed in late 1962 and early 1963 by the Pan American Petroleum Corporation. The well was spudded and drilled to a depth of 355' and 8-5/8" casing was set with 210-sacks of cement (circulated 25-sacks to surface) (Exhibit 3a). A 7-7/8" hole was then drilled to a total depth of 6021' and 4-1/2" casing was set at 6016' with 150-sacks of cement containing 4% gel and 1-1/2 pounds of medium "Tuf Plug" per sack followed by 75-sacks of neat cement in one stage (top of cement est. 5000') (Exhibit 3b). The well was then completed in the Dakota (5889-5901) (Exhibit 3c). Production began in February of 1963 and in May of 1973, Dugan Production became operator of the well. By 1981 the well had stopped producing. In March of 1985, holes in the 4-1/2" casing were repaired by squeezing 150 sacks into leaks at 3632-3662 and 100 sacks into leaks at 2275-2306 (Exhibit 3d). Production was restored and continues to this date (cumulative gas 168,760 mcf, daily gas 15 mcfd) (Exhibit 3e).

The Carpenter #2 located 1460' FSL and 1850' FWL of Section 25, T30N and R14W was drilled and completed by Dugan Production in 1978. This well was spudded and drilled to a depth of 47' and 5-1/2" casing was set with 8-sacks of cement. A 4-3/4" hole was then drilled to a total depth of 1300' and 2-7/8" casing was set at 1284' with 115-sacks of cement (circulated 7-bls. cement to surface).

The well was then perforated in the Fruitland Formation and acidized with 250-gallons of 15% HCL (Exhibit 4a). The well was never fracture stimulated and did not produce gas in paying quantities. In December of 1981, the well was plugged and abandoned by filling the 2-7/8" casing with 33-sacks of cement (Exhibit 4b).

Our records demonstrate that the Carpenter #1 does not have adequate cement across the Fruitland coal interval and has a history of casing failures. The Carpenter #2 is located on the south edge of the Carpenter #1 location and is only 275-feet from the Carpenter #1 well bore.

As a matter of policy, Dugan Production Corp has not allowed other operators or ourselves to locate any new locations within 500 feet of any pre-existing, deeper well bores. We feel that this is sound engineering that minimizes risk, maximizes safety and protects existing well bores. To locate a coal well within 500-feet of our Carpenter #1 is a risk that we would not willingly take. This well bore could be damaged or lost, if we were to drill and frac the Fruitland coal in close proximity to it

In this general area, in order to be productive, the Fruitland coal seams (thin coals less than 10-feet thick, spread out over a 100-foot interval at a depth of 1000-1200 feet) need to be foam frac'd at pressures from 1500-2000 psi and rates of 30-50 bpm with about 40,000 gals of 70Q foam, 60,000# sand and 250,000 SCF of N₂.

Dugan Production has conducted four different surveys in the subject area in search of a suitable location within the Fruitland coal orthodox drilling window to build a drill site on (Exhibit 5). On August 30 and September 1, 1999 two Dugan personnel from our APD department accompanied our surveyor, Ed Reisenhover in the field. On November 12, 1999 I went out with our surveyor and one of our APD personnel to find a suitable location. On January 24, 2000 I made a fourth trip out to the area. The four surveys were unsuccessful in locating a suitable site. All of the places that looked good on the topographic map in the office turned out to be very rough when viewed in the field (the topographic maps are misleading).

Exhibit 6 is an in house memorandum from Dugan's landman David Poage showing the ownership in the Fruitland Coal Formations for the lands offsetting the proposed spacing unit for the referenced well. The ownership presented on this list is shown on the offsetting operator map (Exhibit 7). Exhibits 8a, 8b, 8c and 8d are copies of the signed waivers of objection Dugan Production has received from all affected and offsetting operators and working interest owners notified in the original application.



The entire orthodox drilling window for a Fruitland coal well in the W/2 of Section 25, T30N, R14W encompasses very rugged, badlands type topography at the head of Cottonwood Wash. This area being unique and close to Farmington, NM is a popular area for outdoors-recreational activities like hiking, bicycling and horseback riding. If required to drill the subject well at an orthodox location a considerable amount of dirt work and expense will be required to build a pad. A large pump jack and compressor will be required in order to produce the well. The access road will need to be improved in order to accommodate the large trucks hauling 150-200 barrels of water per day out of the area. These operations will diminish the value of this surface resource area. However, if allowed to locate the subject well at the unorthodox location as proposed, the impact of these operations on the surface resources will be mitigated.

The unorthodox location of the Carpenter Com #90 is necessary in order to avoid areas of extreme topographic conditions, minimize surface resource damage and also minimize risk to an existing well bore.

As stated in the original application, please contact me if you have any questions or need additional information.

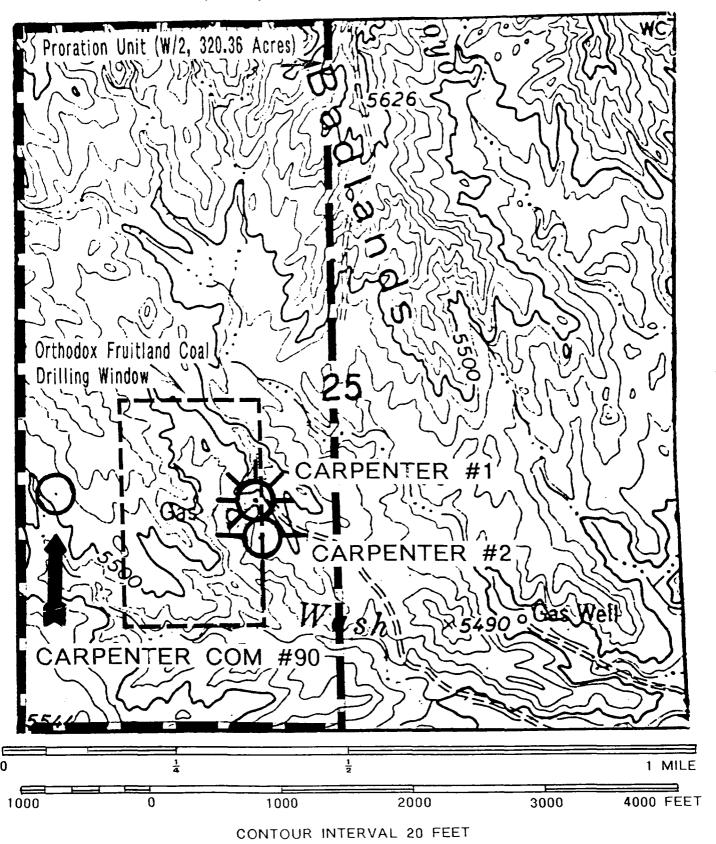
Very Sincerely,

Kurt H. Fagrelius Geologist

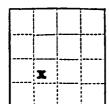
Attachments

cc: Mr. Frank Chavez - New Mexico Oil Conservation Division, Aztec

Sect. 25, Twp. 30 North, Rge. 14 West



TOPOGRAPHIC MAP



(SUBMIT IN TRIPLICATE)

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY

Budget Bureau No. 42-R358.4. Form Approved.

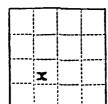
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Unit Carpenter Gas Unit

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Feb. 1951)



(SUBMIT IN TRIPLICATE)

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY

Budget Bureau No. 42-R358.4 Form Approved.

Land Office New Mexico

Lase No. NM-0206994

Unit Carpenter Gas Unit

| | 1AN 25 1983 |
|--|--|
| SUNDRY NOTICES A | ND REPORTS ON WELLS " 9 OFFI DOLGAL SURVE |
| NOTICE OF INTENTION TO DRILL | SUBSEQUENT REPORT OF WATER SHUT-OFF 1-1/2#CTON. T. |
| NOTICE OF INTENTION TO CHANGE PLANS | SUBSEQUENT REPORT OF SHOOTING OR ACIDIZING |
| NOTICE OF INTENTION TO TEST WATER SHUT-OFF. | SUBSEQUENT REPORT OF ALTERING CASING |
| NOTICE OF INTENTION TO RE-DRILL OR REPAIR WELL | SUBSEQUENT REPORT OF RE-DRILLING OR REPAIR |
| NOTICE OF INTENTION TO SHOOT OR ACIDIZE | SUBSEQUENT REPORT OF ABANDONMENT |
| NOTICE OF INTENTION TO PULL OR ALTER CASING. | SUPPLEMENTARY WELL HISTORY |
| NOTICE OF INTENTION TO ABANDON WELL | |
| (INDICATE ABOVE BY CHECK MARK | NATURE OF REPORT, NOTICE, OR OTHER DATA) |
| Carpenter Gas Unit "B" | Farmington, New Mexico January 23 , 19.63 |
| Well No. 1 is located 1730 ft. from | S line and 1800 ft. from W line of sec. 25 |
| NE/4 St/4 Section 25 T-3(N E-1/4 (Twp.) | N.M.P.M. Range) (Meridian) |
| Basin Dakota San Juan (Field) San Juan | r Subdivision) (State or Territory) |
| The elevation of the derrick floor above sea lev | el is 5512 ft. JAN 2 8 1963 OIL CON. COM |
| DETAI | LS OF WORK |
| State names of and expected depths to objective sands; show size ing points, and all ot | es, weights, and lengths of proposed casings; indicate mudding jobs, cament- ther important proposed work) |
| The above well was drilled to a total 6016' with 150 sacks cement containing | depth of 6021 and 4-1/2 casing set at ag 45 gel and 1-1/2 pounds medium Tuf Plug pment. After waiting on cement, tested |
| these perforations with 30,000 gallor 7 pounds of Dowell J-93 per 1000 gallor 8 per 1000 gallor Breakdown 1200, Treating 2800, Average Set bull plug at 5845 and tested with 5801 with 4 shots per foot. Sand wat gallons water containing 1% calcium of 1000 gallons and 30,000 pounds sand. treating pressure 2900; Average injections and 30,000 pounds sand. | with 4 shots per foot. Sand water fracked is water containing 15 calcium chloride and lons and 30,000 pounds sand. Pressures were ge injection rate 42 barrels per minute. In 3000 pounds. Test ok. Perforated 5789—ter fracked these perforations with 30,000 chloride and 7 pounds of Dowell J-98 per No noticable breakdown pressures. Average cation rate 38 barrels per minute. (SEE REVIRSI writing by the Geological Survey before operations may be commenced. |
| Company Pan American Petroleum Corps | oration |

GPO 914974

Title Petroleum Engineer

Address P. O. Box 480

Farmington, New Next co

Attn: I. O. Specry Jr.

OSTRIGUTION UNATA FT FILE LAND OFFICE TRANSPORTER PROPATION OFFICE OFFIATOR

NEW MEXICO CIL CONSERVATION COMMISSION Santa Fe. New Mexic

(Form C-194) Revised 7/1/57

REQUEST FOR (XXXX) - (GAS) ALLOWARLE

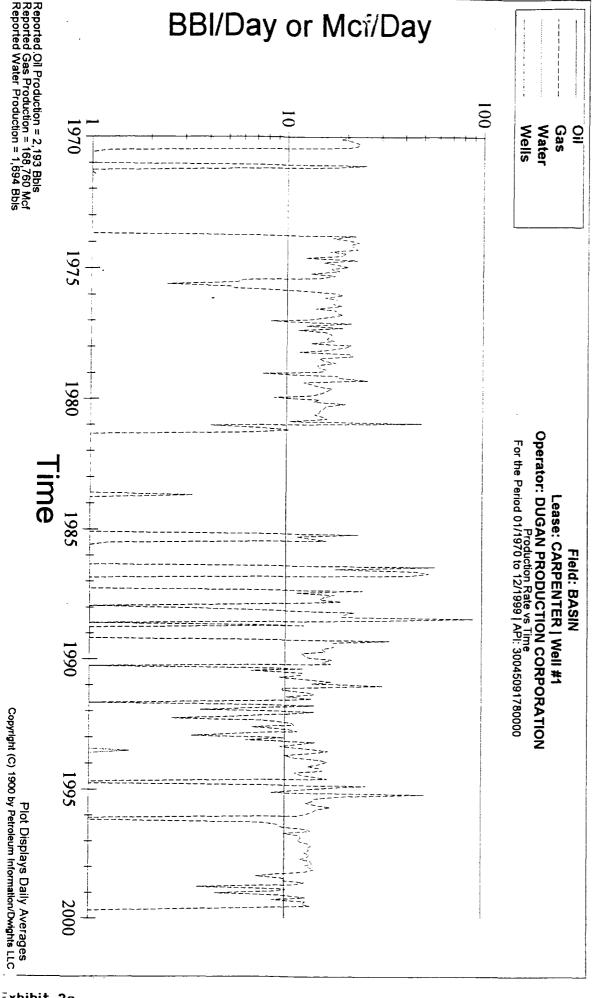
New Well

This form shall be submitted by the operator before an initial allowable will be assigned to any completed Oil or Gas well. Form C-104 is to be submitted in QUADRUPLICATE to the same District Office to which Form C-101 was sent. The allowable will be assigned effective 7:00 A.M. on date of completion or recompletion, provided this form is filed during calendar month of completion or recompletio: The completion date shall be that date in the case of an oil well when new oil is delivered into the stock tanks. Gas must be reported on 15.025 psia at 60° Fahrenheit.

| | | | | | Farmington, New Mexico | January 31, 1963 |
|---------------|-------------|-------------|------------|---|--|------------------------------|
| WE AR | E HER | EBY RE | QUESTI | NG AN ALLOWABLE | FOR A WELL KNOWN AS: | (3337) |
| | rican. | Petrole | un Cor | | Gas Umi Weil No. 1 in. | NE 1/2 SH 1/2 |
| K | (Compa | ny or Oper | ator) | · (La | raic) H, NMPM.,Basin Dakota | ,,,, |
| | | | | County Date Spudde | ed 12-23-62 Date Drilling 0 | Completed 1-11-62 |
| | | ndicate lo | | Elevation 51.991(C | Total Depth 60211 | PBTD_ 5975 |
| D | C | В | A | PRODUCING INTERVAL - | Name of Prod. Form. D | akota |
| E | F | G | H | | Depth Casing Shoe 6016 | Septh |
| | | <u> </u> | | OIL WELL TEST - | Casing Shoe BOIDs | |
| L | X | J | I | Natural Prod. Test: | bbls.oil,bbls water in | Choke nhrs,min.Size |
| M | N | 0 | P | | bbls.oil,bbls water in | Chake |
| | | <u></u> | | GAS WELL TEST - | | |
| 1730 | | and 18 | 00' FHL | Natural Prod. Test: | MCF/Day; Hours flowed | Choke Size |
| Tubing Siz | Casing | and Cemen | ting Recor | d Method of Testing (pit | tot, back pressure, etc.): | |
| | · 1 | | | 1 | acture Treatment: 1371. MC | F/Day; Hours flowed 3 |
| 8_9 | 5/S# | 345 | 21.0 | | ethod of Testing: Pitot Tube | |
| 4-1 | L/2H (| 6045 | 225 | Acid or Fracture Treat sand): 60,000 ga]] | ment (Give amounts of materials used, su lons water and 60,000 pounds | sch as acid, water, oil, and |
| 2-3 | 3/8" | 5790 | <u> </u> | Casing Tubir Press. 300(CPF) ress | Date first new 5. 75(TPF) il run to tanks | |
| | | . | | | | <u> </u> |
| <u> </u> | | | | Gas Fransporter | t in Pagin Palmta Field Por | olorment Vell. |
| | | | | | nt in Basin Dakota Field Devi | |
| | × | apasms | | • | | 19.19 |
| | | | t the info | rmation given above is | true and complete to the best of my kn PAN AMERICAN PETROLEUM | COPPOSITION |
| Approv | | | | • | Company or | Speratoria A 1963 |
| | | | | COMMISSION W. B. Smith | By: 7 (Signate | und OIL CON. 3 |
| By · <u>.</u> | - 71Y | OIL & GA | S INSPEC | TOR TRIO SOT | Title Administrative Cle Send Communications | regarding |
| Exhibit 3 | 3c. <u></u> | | | | Name Le Ue Speer dra | Yes Verico |

| Form 3160-5 (November 1983) (Formerly 9-331) | UNITED STATES EPARTME. OF THE INTER | | 5. LEASE DESIGNATION AND BERIAL NO. |
|--|---|--|---|
| | BUREAU OF LAND MANAGEMENT NOTICES AND REPORTS for proposals to drill or to deepen or plug "APPLICATION FOR PERMIT—" for such | ON WELLS | NM-0206994 6. IF INDIAN, ALLOTTEE OR TRIPE NAME |
| i. OIL GAS X | OTHER | P. L. D. D. D. L. D. | 7. UNIT AGREEMENT NAME |
| 2. NAME OF OPERATOR | | | 8. FARM OR LEASE NAME |
| Jugan Pr | oduction Corp. | | Carpenter 9. TELL NO. |
| P.O. Box | 208, Farmington, NM 874 | | 1 |
| See hiso Foace 14 Octow.1 | location clearly and in accordance with an | y Staje requirements. | 10. FIELD AND POGL, OF WILDCAT |
| At surface | 1730' FSL & 1800' FWL | MAR 151993 | Basin Dakota 11. SEC., T., E., M., OF FLE. AND BULLET OR AREA |
| <u></u> | ຮຸບຕ | REAU DE LES DIVIAN CLIMANT | Sec. 25, T30N, R14W, NHPM |
| 14. PERMIT NO. | 15. ELEVATIONS (Show whether | • | 12. COUNTY OR PARISE 13. STATE |
| | <u> </u> | | San Juan NM |
| | heck Appropriate Box To Indicate | Nature of Notice, Report, or C | Diher Data |
| ۲ | OF INTENTION TO: | 8CEZEC. | GENT REPORT OF: |
| TEST WATER SHUT-OFF | MULTIPLE COMPLETE | WATER SHUT-OFF FRACTURE TREATMENT | ALTERING CABING |
| SHOOT OR ACIDIZE | ABANDON* | SHOOTING OR ACIDIZING | ABANDONMENT® |
| REPAIR WELL (Other) | CHANGE PLANS | (Other) | of maitiple completion on Well letion Report and Log form.) |
| The 4½" Casing w 1. A drillable 2. Ran 4½" Mode 2275' - 2306 3. Squeezed lea 4. Squeezed lea Neat. (Tota valve while 5. Drilled out 6. Cleaned out 7. Ran 187 join Baker Model 8. Swabbed tubi acid back. 9. Blowing inte | '. k from 3632 - 3662' with k from 2275 - 2306' 200 s 1 Slurry 530 cu.ft.) had | as follows: reline at 5510' RKB. ro casing leaks, one fr 150 sx class "B" Cemer k of 2% Lodense follow intermittent circulati d casing held ok. 8 Rd EUE Tubing TE 588 rta formation w/250 ga to clean up. | rom 3632' - 3662' & one from nt. wed by 100 sx class "B" ion through braden head |
| | | | |
| 18. I hereby certify that the fo | lim lacobe | V: D :: | 2/11/05 |
| | | Vice President | DATE 3/14/85 |
| (This space for Federal or | State office use) | | ACCEPTED FOR RECORD |
| APPROVED BY CONDITIONS OF APPROV | AL, IF ANY: | | MAR 21 1985 |

FARMINGTON RESOURCE AREA



23.

33 •

SIZE

Form approved. Budget Bureau No. 42-R355.5. SUBMIT IN DUPLI' "E* UN ED STATES ier in-DEPARTMENT OF THE INTERIOR structures on 5. LEASE DESIGNATION AND SERIAL NO. reverse side) GEOLOGICAL SURVEY NM 0206994 6. IF INDIAN, ALLOTTEE OR TRIBE NAME WELL COMPLETION OR RECOMPLETION REPORT AND LOG* 1a TYPE OF WELL: OIL 7. UNIT AGREEMENT NAME Other L TYPE OF COMPLETION: WORK _ PLUG BACK MELL S. FARM OR LEASE NAME Other 2. NAME OF OPERATOR Carpenter Dugan Production Corp. 3. ADDRESS OF OPERATOR Box 208, Farmington, NM 87401 10. FIELD AND POOL, OR WILDCAT 4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements). Harper Hill Ext. At surface1460' FSL - 1850' FWL 11. SEC., T., R., M., OR BLOCK AND SURVEY OR AREA At top prod. interval reported below Sec 25 T30N R14W At total depth 14. PERMIT NO. 13. STATE 12. COUNTY OR DATE ISSUED PARISH San Juan 15. DATE SPUDDED 16. DATE T.D. REACHED | 17. DATE COMPL. (Ready to prod.) 18. ELEVATIONS (DF, REB, RT, GR, ETC.) 19. ELEV. CASINGHEAD 8-16-78 8-17-78 Plan to P & A 5500' GL 23. INTERVALS 20. TOTAL DEPTH. MD & TVD -21. PLUG, BACK T.D., MD & TVD 22. IF MULTIPLE COMPL., ROTARY TOOLS CABLE TOOLS HOW MANY ·: . 1216' Plan to P & A 0-TD 24. PRODUCING INTERVAL(S), OF THIS COMPLETION-TOP, BOTTOM, NAME (MD AND TYD)* WAS DIRECTIONAL SURVEY MADE 1174-1181' No-840-850 26. TYPE ELECTRIC AND OTHER LOGS BUN 27. WAS WELL CORED **IES** No CASING RECORD (Report all strings set in well) CABING SIZE WEIGHT, LB./FT. DEPTH SET (MD) HOLE SIZE CEMENTING RECORD AMOUNT PULLED 5-1/2" 14# 47' 7-7/8" 8 sx 2-7/8" 6.4# 1284 4-3/4" 115 sx LINER RECORD 30 TUBING RECORD TOP (MD) BOTTOM (MD) PACKER SET (MD) SCREEN (MD) SIZE DEPTH SET (MD) None 31. PERFORATION RECORD (Interval, size and number) ACID. SHOT, FRACTURE, CEMENT SQUEEZE, ETC. 840-850 DEPTH INTERVAL (MD) AMOUNT AND KIND OF MATERIAL USED 1174-1181 840-850 1174-1181 250 gals 15% HCT PRODUCTION PRODUCTION METHOD (Flowing, gas lift, pumping—eize and type of pump) WELL STATUS (Producing or

DATE FIRST PRODUCTION No Test - Plan to P & A DATE OF TEST HOURS TESTED CHOKE SIZE PROD'N. FOR TEST PERIOD OIL-BBL GAS-MCF. GAS-OIL RATIO 13. CASING PRESSURE CALCULATED 24-HOUR RATE OIL-BBL. GAS--- MCT. 34. DISPOSITION OF GAS (Sold, used for fuel, vented, etc.) 35. LIST OF ATTACHMENTS 36. I hereby certify that the foregoing and attached information is complete and correct as determined from all available President 4-27-80

*(See Instructions and Spaces for Additional Data on Reverse Side)

TITLE

Dugan

81

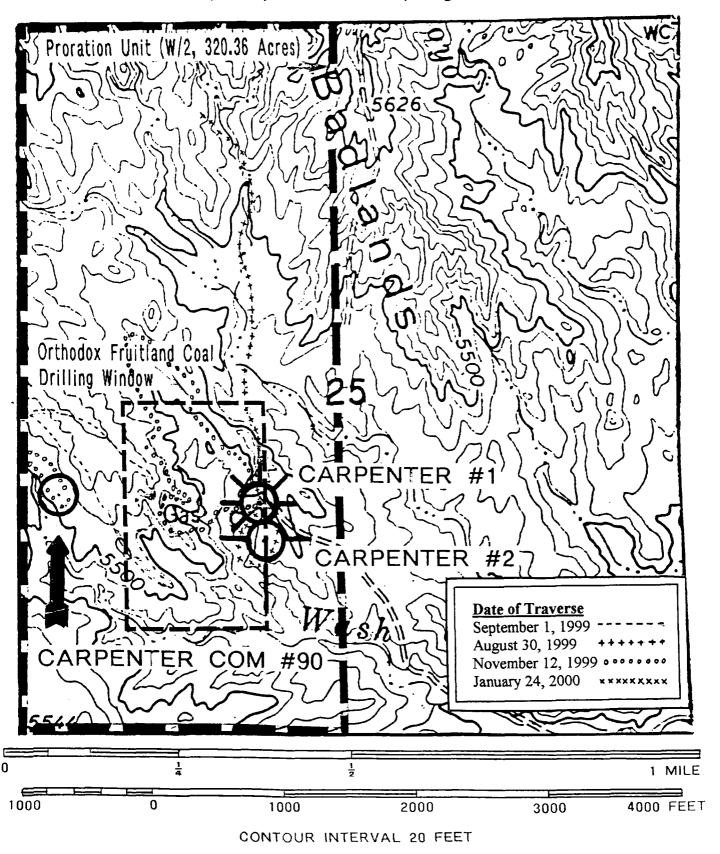
DATE.

SIGNED

l File

| Form 9–331 Dec. 1973 | Budget Bureau No. 42-R1424 |
|---|---|
| UNITED STATES | 5. LEASE |
| DEPARTMENT OF THE INTERIOR | NM 0206994 |
| GEOLOGICAL SURVEY | 6. IF INDIAN, ALLOTTEE OR TRIBE NAME |
| SUNDRY NOTICES AND REPORTS ON WELLS | 7. UNIT AGREEMENT NAME |
| (Do not use this form for proposals to drill or to deepen or plug back to a different reservoir. Use Form 3–331–C for such proposals.) | 8. FARM OR LEASE NAME |
| 1. oil gas well other | Carpenter |
| - Hell - Hell Guidi | 9. WELL NO |
| 2. NAME OF OPERATOR DUGAN PRODUCTION CORP. | 2 10. FIELD OR WILDCAT NAME |
| 3. ADDRESS OF OPERATOR | Harper Hill Ext. |
| P O Box 208, Farmington, NM 87401 | 11. SEC., T., R., M., OR BLK. AND SURVEY OR |
| 4. LOCATION OF WELL (REPORT LOCATION CLEARLY. See space 17 | |
| below.) AT SURFACE: 1460' FSL - 1850' FWL | Sec 25 T30N R14W 12. COUNTY OR PARISH 13. STATE |
| AT TOP PROD. INTERVAL: | San_Juan NM |
| AT TOTAL DEPTH: | 14. API NO |
| 16. CHECK APPROPRIATE BOX TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA -: | 1.3. * * * * * * |
| REPORT, OR OTHER DATA | 15. ELEVATIONS (SHOW DF, KDB, AND WD) 5500' GL |
| REQUEST FOR APPROVAL TO: SUBSEQUENT REPORT OF: | 5500 GL S |
| TEST WATER SHUT-OFF | |
| FRACTURE TREAT RECEI | IVED BEEL TO BE |
| REPAIR WELL DED 14 | 10(NOTE: Report results of multiple completion or zone change on Form 9–330.) |
| | IJOI change on Form 9-330.) |
| MULTIPLE COMPLETE | MAL SURVEY |
| ABANDON* FARMINGTO | |
| (other) | |
| 17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly statincluding estimated date of starting any proposed work. If well is comeasured and true vertical depths for all markers and zones pertined. | directionally drilled, give subsurface locations and |
| Plugged and abandoned well as follows: | |
| 1. Filled 2-7/8" with 33 sx cement, d | lisplaced with # bbl. water |
| 2. Installed permanent dry hole monum | ment. 전출증공학 및 원세현실 |
| Filled all pits. Cleaned well location of all equin | |
| Cleaned well location of all equip Will complete surface restoration a | ment, pipe, junk, and trasn. |
| management agency or landowner nex | t planting spacen |
| 6. Cut off tie-downs 1 ft. below surf | ace. |
| | |
| | |
| • | TERROYE |
| Subsurface Safety Valve: Manu. and Type | Set @Ft. |
| 18. I hereby certify that the foregoing is true and correct | |
| Sherman E. Dugan Agent | DATE 12-3-81 |
| / (This space for Federal or State of | Hice use) |
| APPHOVED BY TITLE | DATE |
| CONDITIONS OF APPROVAL, IF ANY: | |

Sect. 25, Twp. 30 North, Rge. 14 West



TOPOGRAPHIC MAP SHOWING SURVEY TRAVERSES

Dugan Production Corp. P.O. Box 420 Farmington, NM 87499 505-325-1821

Memorandum

To:

Kurt Fagrelius

Frome

David Poage

Date:

01/24/00

Re:

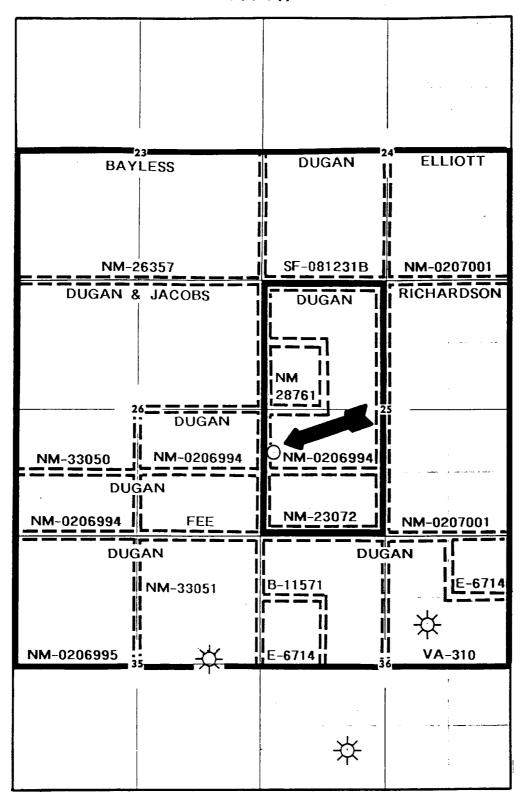
Carpenter Com # 90 Well

The following is the ownership in the Fruitland Coal Formation for the lands offsetting the proposed spacing unit for the referenced well. This well is to be spaced as a W/2 Section 25-T30N-R14W unit. All of the lands listed below are located in Township 30 North, Range 14 West.

| Description | <u>Lease</u> | W.I. Owner | Percent |
|-------------|--------------|----------------------------|---------|
| S/2 23 | NM-26357 | Robert L. Bayless Producer | 100.00% |
| SE/4 24 | NM-0207001 | Elliott Oil Company | 100.00% |
| SW/4 24 | SF-081231B | Dugan Production Corp. | 100.00% |
| E/2 25 | NM-0207001 | Dugan Production Corp. | 100.00% |
| W/2 25 | NM-28761 | Dugan Production Corp. | 100.00% |
| | NM-0206994 | Dugan Production Corp. | 100.00% |
| | NM-23072 | Dugan Production Corp. | 100.00% |

1/24/00 Memorandum

| N/2, N/2SW/4 26 | NM-33050 | Dugan Production Corp. | 75.00% |
|---------------------|---------------------|---------------------------|---------|
| • | | Jim & Mary Lou Jacobs Tr. | 25.00% |
| S/2SW/4, N/2SE/4 26 | NM-0206994 | Dugan Production Corp. | 100.00% |
| S/2SE/4 26 | Fee | Dugan Production Corp. | 100.00% |
| N/2 35 | NM-0206995 | Dugan Production Corp. | 100.00% |
| | NM-33051 | Dugan Production Corp. | 100.00% |
| N/2 36 | State of NM B-11571 | Dugan Production Corp. | 100.00% |
| | State of NM E-6714 | Dugan Production Corp. | 100.00% |
| | State of NM VA-310 | Dugan Production Corp. | 100.00% |

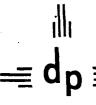


N

Dugan Production Corp.
Carpenter Com # 90
Application For Unorthodox Location

OFFSETTING OPERATOR MAP FRUITLAND COAL WELLS ONLY

All offsetting operators are 100% working interest owners





CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 10, 2000

Jim L. and Mary Lou Jacobs Trust 3505 Crescent Ave.
Farmington, NM 87401

Re: Application for Administrative Approval of Unorthodox Location Dugan Production Corp.'s Carpenter Com # 90 1767' FSL & 280' FWL (NW/4 SW/4) Unit L, Section 25, T30N, R14W San Juan County, New Mexico Basin Fruitland Coal Pool

Dear Jim Jacobs:

Dugan Production Corp. requests that the Jim L. and Mary Lou Jacobs Trust waive objection to it's application for administrative approval of the unorthodox location referenced above. A copy of this application is enclosed for your review.

Please sign and return this waiver form in the enclosed envelope. If you wish to object to this application, you must notify the New Mexico Oil Conservation Commission at 2040 South Pacheco Street, Santa Fe, NM, 87505 within 20 days of receiving this notice.

Sincerely,

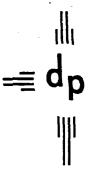
Kurt Fagrelius

Kurt H. Fagrelius

Geologist

Jim L. and Mary Lou Jacobs Trust waives objection in the above matter.

| 1-14-2000 | Date | | Date | | Date | Date



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 10, 2000

Richardson Production Co. 1700 Lincoln, Suite 1700 Denver, Colorado 80203

Re: Application for Administrative Approval of Unorthodox Location Dugan Production Corp.'s Carpenter Com # 90 1767' FSL & 280' FWL (NW/4 SW/4) Unit L, Section 25, T30N, R14W San Juan County, New Mexico Basin Fruitland Coal Pool

Dear Richardson Production:

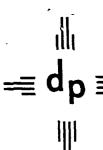
Dugan Production Corp. requests that Richardson Production waive objection to it's application for administrative approval of the unorthodox location referenced above. A copy of this application is enclosed for your review.

Please sign and return this waiver form in the enclosed envelope. If you wish to object to this application, you must notify the New Mexico Oil Conservation Commission at 2040 South Pacheco Street, Santa Fe, NM, 87505 within 20 days of receiving this notice.

matter.

| Sincerely, Int Fagrelius Kurt H. Fagrelius Geologist |
|---|
| Richardson Production Co. waives objection in the above |

| Cathleen | Colby | 1-17-00 |
|------------|-------|---------|
| Print Name | 7 | Date |
| Cathleen | Colle | 1-17-00 |
| Signature | 0 | Date |



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 10, 2000

Robert Bayless Producer, L.L.C. P.O. Box 168 Farmington, NM 87499

Re: Application for Administrative Approval of Unorthodox Location Dugan Production Corp.'s Carpenter Com # 90 1767' FSL & 280' FWL (NW/4 SW/4) Unit L, Section 25, T30N, R14W San Juan County, New Mexico Basin Fruitland Coal Pool

Dear Robert Bayless Producer, L.L.C.:

Dugan Production Corp. requests that Robert Bayless waive objection to it's application for administrative approval of the unorthodox location referenced above. A copy of this application is enclosed for your review.

Please sign and return this waiver form in the enclosed envelope. If you wish to object to this application, you must notify the New Mexico Oil Conservation Commission at 2040 South Pacheco Street, Santa Fe, NM, 87505 within 20 days of receiving this notice.

Sincerely,

Kurt Fegralius

Kurt H. Fagrelius

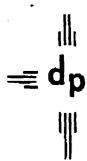
Geologist

Robert Bayless Producer, L.L.C. waives objection in the above matter.

Print Name
Date

Date

Date



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 10, 2000

Elliott Oil Company P.O. Box 1355 Roswell, NM 88202-1355

Re: Application for Administrative Approval of Unorthodox Location Dugan Production Corp.'s Carpenter Com #90 1767' FSL & 280' FWL (NW/4 SW/4) Unit L, Section 25, T30N, R14W San Juan County, New Mexico Basin Fruitland Coal Pool

Dear Elliott Oil Company:

Dugan Production Corp. requests that Elliott Oil waive objection to it's application for administrative approval of the unorthodox location referenced above. A copy of this application is enclosed for your review.

Please sign and return this waiver form in the enclosed envelope. If you wish to object to this application, you must notify the New Mexico Oil Conservation Commission at 2040 South Pacheco Street, Santa Fe, NM, 87505 within 20 days of receiving this notice.

Singerely,

Nurt Fagne live

Kurt H. Fagrelius

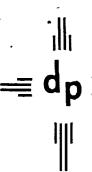
Geologist

Elliott Oil Company waives objection in the above matter.

Print Name

Date

Signature Date



January 10, 2000

Mr. Michael E. Stogner New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Application for Administrative Approval of
Unorthodox Location for Dugan Production Corp's. Carpenter Com # 90
1767' FSL & 280' FWL (NW/4 SW/4)
Unit L, Section 25, T30N, R14W
San Juan County, New Mexico
Basin Fruitland Coal Pool

Dear Mr. Stogner:

Dugan Production hereby requests approval for an unorthodox location for the referenced well. Attached for your reference are the following exhibits:

- 1. Well location and acreage dedication plat (NMOCD Form C-102)
- 2. Topographic map
- 3. Offsetting operator map

The unorthodox location is necessary due to topographic conditions.

By certified mail, a copy of this application and request for administrative approval has been sent to all Fruitland coal offsetting operators and the Bureau of Land Management.

Please contact me if you have any questions or need additional information.

Very Sincerely,

Kurt Fagrelius
Kurt H. Fagrelius

Attachments

Obstrict II Obstrict II

PO Drawer DD, Arielia, NM 35211-3719

District III 1000 Rin Brown Rd., Astee, NM 37410 District IV

PO Bux 1088, Santa Fe. NAI 47504-1084

OIL CONSERVATION DIVISION - PO Box 2088

Sinte of New Mexico
Energy, Minerals & Natural Resources Department

Santa Fe, NM 87504-2088

Form C-102 Revised February 21, 1994

Instructions on back

Submit to Appropriate District Office
State Lease + 4 Copies

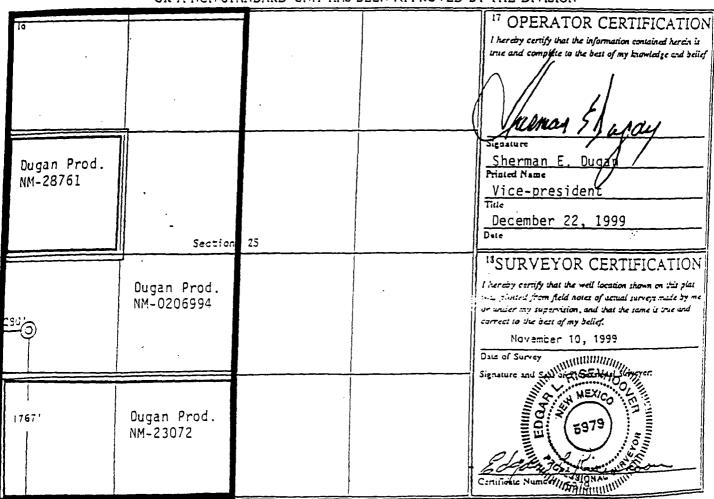
Fee Lease - 3 Copies

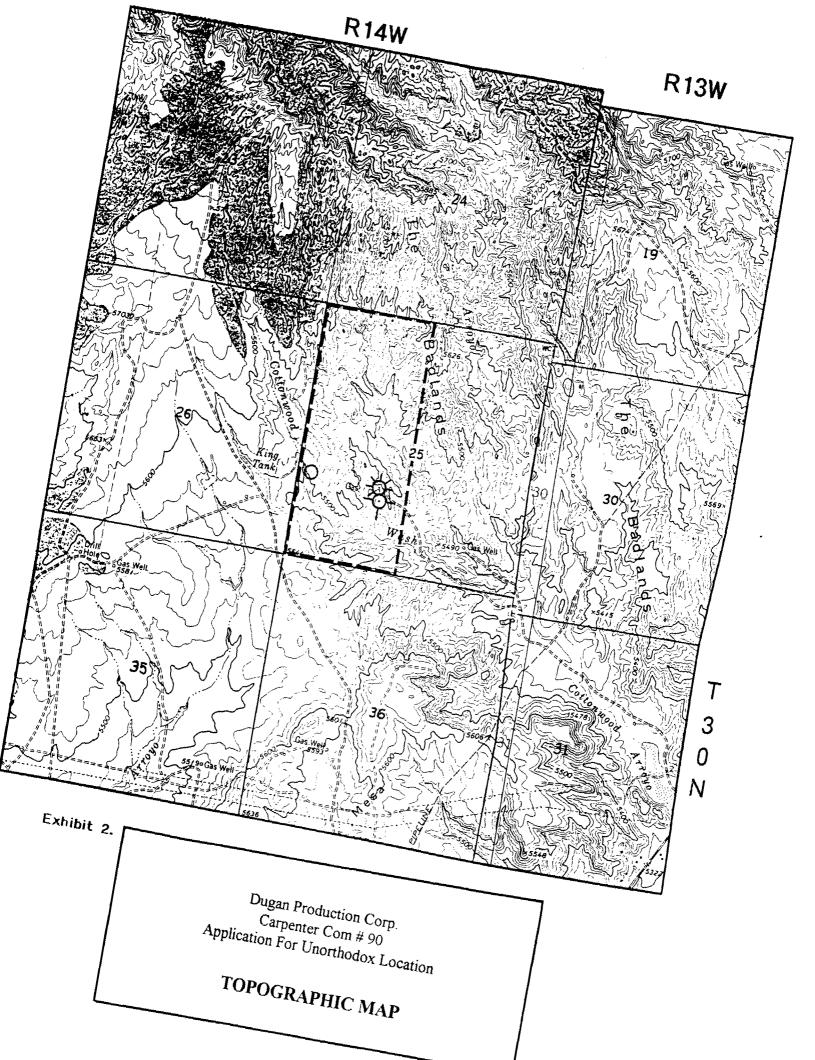
AMENDED REPORT

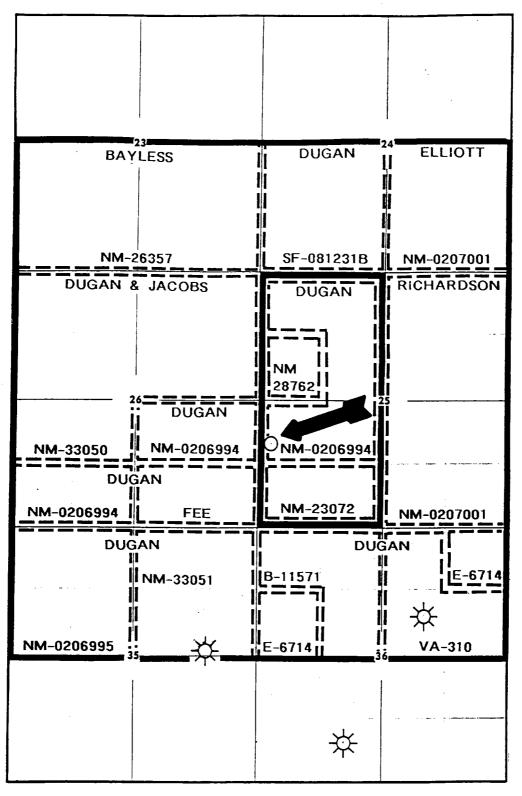
WELL LOCATION AND ACREAGE DEDICATION PLAT

| | AST Num | ber Pool Cade | | de | * Pool Name | | | | | |
|---|-----------|---------------|-----------------------------------|-----------|---------------|------------------|----------------------|-------------|-------------|--|
| 30 | 30 045 | | | 71529 | | | Basin Fruitland Coal | | | |
| י ו'הוספרון | Code | | ¹ Property Name * Well | | | | · Well Number | | | |
| | | | Carper | tar Coπ | 1 | | | | 90 | |
| יטקאנס | No. | | | | * Operati | ur Name | | | · Eratioa | |
| 0065 | 15 | | Dugan | Productio | n Caraeratio | an | | | 5510' | |
| | | | | | 10 Surface | Location | | | | |
| Ul, ar lut au. | Section | Tuwasaip | Range | مها اسا | Feet from the | North/South line | Feet from the | ENUWOUS | ae Cauaiy | |
| L | 25 | 30N | 144 | 1_ | 1767 | South | 230 | West | San Juan | |
| 11 Bottom Hole Location If Different From Surface | | | | | | | | | | |
| UL or lot so. | Section | Township | Range | Lot Ida | Feet from the | North/South line | Feet from the | Euglyat lin | ce Causty | |
| | | | 1 | | | | 1 | | | |
| 12 Dedicated Acre | a laiat e | e laful 14 C | onsolidation | Code 15 O | rder No. | | * | | | |
| 320 | 1 | | | - | • | | | | | |

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED. OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION







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Exhibit 3.

Dugan Production Corp.

Carpenter Com # 90

Application For Unorthodox Location

OFFSETTING OPERATOR MAP FRUITLAND COAL WELLS ONLY



Exhibit 3a.

OFFSET OPERATORS NOTIFICATION LIST

Robert Bayless Producer, L.L.C. P.O. Box 168 -Farmington, NM 87499

Elliott Oil Company P.O. Box 1355 Roswell, NM 88202-1355

Richardson Production Co. 1700 Lincoln, Suite 1700 Denver, Co 80203

Jim L. & Mary Lou Jacobs Trust 3505 Crescent Ave. Farmington, NM 87401