

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

September 19, 2001

VIA HAND DELIVERY AND FACSIMILE

Ms. Lori Wrotenbery, Director
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87504

Re: Request of Richardson Production Company
for Extension of Date for Commencement of Well
Pursuant to Compulsory Pooling Order R-11549
Case 12598 (Ropco Well No. 9-2)
SE/4 Section 9, T29N, R14W, NMPM
San Juan County, New Mexico

Dear Ms. Wrotenbery:

On behalf of Richardson Production Company ("Richardson") and in accordance with the provisions of the referenced order, I am requesting a 90-day extension to the commencement date for subject well and in support state:

- (1) the order was entered effective March 15, 2001 and provided that this well shall be commenced on or before July 1, 2001;
- (2) On June 21, 2001, the Division granted Richardson's request to extend the commencement date from July 1, 2001 to on or before October 1, 2001;

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Oil Conservation Division

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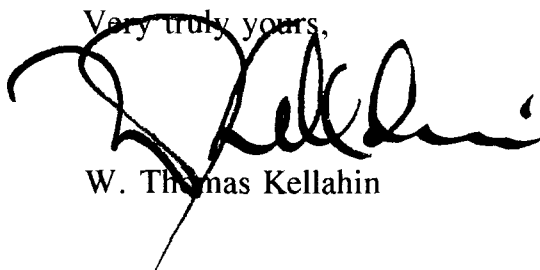
(3) The Ropco No. 9-2 well will be located on BLM surface next to existing surface disturbance (Conoco and Western Gas Resources products pipelines). The most logical way to access the wellsite is across BLM surface. However, during the BLM on site inspection, Richardson's route was denied because, in part, it was more than 300 feet from existing surface disturbance;

(4) Richardson is still negotiating a surface right of way for this well across private lands;

(5) an additional 90-day extension to January 1, 2002 will afford Richardson with a reasonable opportunity to complete its negotiations for an alternate access to the location.

Should you grant this extension, I have enclosed for your consideration a proposed letter which will authorize the requested extension. Should you decide to deny this request, I would appreciate being advised immediately so that Richardson can timely file to re-instate this pooling order which will otherwise expire.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', with a long, sweeping horizontal stroke extending to the right.

W. Thomas Kellahin

cc: David R. Catanach (NMOCD Hearing Examiner)

cc: Richardson Production Company

Attn: Cathy Colby

September __, 2001

W. Thomas Kellahin
Kellahin & Kellahin
P. O. Box 2265
Santa Fe, New Mexico 87501

Re: Approval of Request for Extension of Date to Commence
Operations on the Ropco Well No. 9-2
Order R-11549 Case 12598

Dear Mr. Kellahin:

Based upon good cause shown in your written request dated September 19, 2001, and in accordance with the provisions of Division Order R-11549 and the authority retained by the Division therein, Richardson Production Company is hereby granted an extension of time until January 1, 2002 in which to commence the drilling of the Ropco Well No. 9-2 located in the SE/4 of Section 9, T29N, R14W, NMPM, San Juan County, New Mexico.

Sincerely,

Lori Wortenberg
Director