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14328.0084

January 21, 2015

VIA EMAIL AND U.S. MAIL

Matthew Lepore
Director
Colorado Oil & Gas Conservation
Commission
1120 Lincoln St, Suite 801
Denver, Colorado 80203

matt.lepore@state.co.us

Re: Request for Exception Location for Allison Unit Com 138H Well

Dear Director Lepore:

ConocoPhillips submits this letter to request an exception location under Colorado Oil and Gas Conservation Commission ("COGCC") Rule 318.c.

ConocoPhillips has proposed the drilling of the horizontal Allison Unit Com 138H Well ("Well"), a portion of which will be located in Section 22, Township 32 North, Range 6 West, N.M.P.M. ("Section 22") as described on the plat attached as Exhibit 1. Order No. 112-6, as amended by Order No. 112-61 to apply to the Fruitland formation, established, among other things, a drilling unit comprised of the $W\frac{1}{2}$ and $W\frac{1}{2} E\frac{1}{2}$ of Section 22 with 990 foot unit boundary setbacks. ConocoPhillips seeks to locate the treated interval of the wellbore for the Well no less than 675 feet from the northern boundary of the spacing unit comprised of the $W\frac{1}{2}$ and $W\frac{1}{2} E\frac{1}{2}$ of Section 22.

Sections 15, Township 32 North, Range 6 West, N.M.P.M. ("Section 15") is adjacent to the northern boundary of Section 22. Order No. 112-190 established a 660 foot unit boundary setback for Sections 15. Because ConocoPhillips is requesting a well location exception of 675 feet that is approximately reciprocal to the existing 660 foot boundary setback in this adjacent unit, Conoco has not requested waivers from the owners in Section 15.

Pursuant to Rule 318.c., ConocoPhillips hereby requests your approval of the location of the Well. Rule 318.c. provides that "[t]he Director may grant an operator's request for a well location exception to the requirements of this rule or any order because of geologic, environmental, topographic or archaeological conditions, irregular sections, a surface owner request, or for other good cause shown." Applicant requests this exception location to ensure maximum efficient lateral length and optimal hydrocarbon recovery and notes that 660 unit boundary setbacks are common in this area.

Holland & Hart LLP

Phone [303] 295-8000 **Fax** [303] 295-8261 **www.hollandhart.com**

555 17th Street Suite 3200 Denver, CO 80202 **Mailing Address** P.O. Box 8749 Denver, CO 80201-8749

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C. ☐



January 21, 2015
Page 2

In the alternative, should you choose not to approve this request for exception location, ConocoPhillips requests that this request be placed on the next COGCC Hearing Agenda.

Thank you for your prompt attention to this matter and please do not hesitate to contact me if you need additional information or have questions.

Sincerely,

Elizabeth Y. Spencer
Of Counsel

Enclosures

cc: Chuck Creekmore

Exhibit 1

DISTRICT I
1625 N. French Dr., Hobbs, N.M. 88240
Phone: (575) 393-6181 Fax: (575) 393-0720

DISTRICT II
811 S. First St., Artesia, N.M. 88210
Phone: (575) 748-1283 Fax: (575) 748-9720

DISTRICT III
1000 Rio Brazos Rd., Aztec, N.M. 87410
Phone: (505) 334-6178 Fax: (505) 334-6170

DISTRICT IV
1220 S. St. Francis Dr., Santa Fe, N.M. 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, N.M. 87505

Form C-102
Revised August 1, 2011
Submit one copy to appropriate
District Office

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code		*Pool Name FRUITLAND COAL	
*Property Code		*Property Name ALLISON UNIT COM			
*GRID No.		*Operator Name BURLINGTON RESOURCES OIL & GAS COMPANY LP			
					*Well Number 138H
					*Elevation 6134

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	8	32 N	6 W	LOT 3	176	NORTH	2615	WEST	SAN JUAN

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	22	32 N	6 W		675	NORTH	990	WEST	LA PLATA

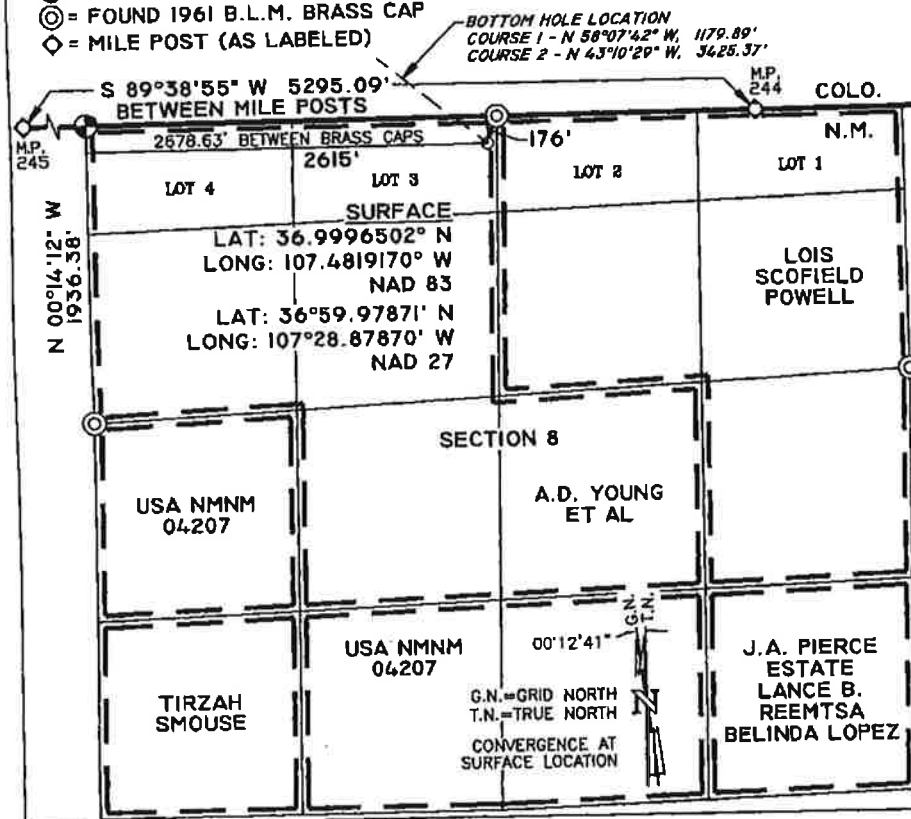
¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

¹⁶ LEGEND:

- = SURFACE LOCATION
- = FOUND 1961 B.L.M. BRASS CAP (CC)
- ⊙ = FOUND 1961 B.L.M. BRASS CAP
- ◇ = MILE POST (AS LABELED)

BEARINGS & DISTANCES SHOWN ARE
REFERENCED TO THE NEW MEXICO
COORDINATE SYSTEM, WEST ZONE,
NAD 83, UNLESS OTHERWISE NOTED.



¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature _____ Date _____
Printed Name _____
E-mail Address _____

¹⁸ SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

04/07/14

Date of Survey

Signature and Seal of Professional Surveyor



17078
Certificate Number

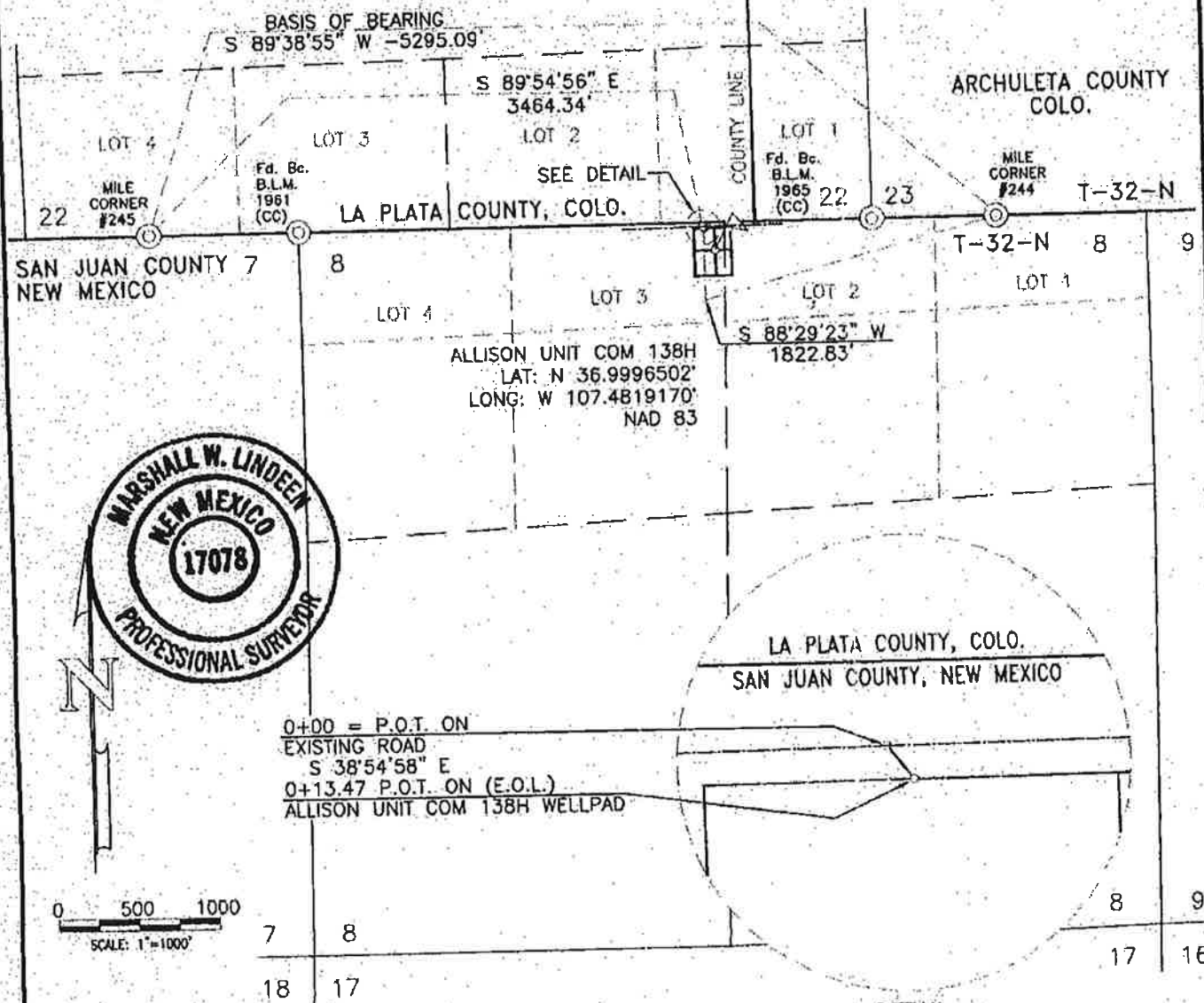
Exhibit 1

BURLINGTON RESOURCES OIL & GAS COMPANY LP

ALLISON UNIT COM 138H PROPOSED ACCESS

NW/4 SEC. 8, T-32-N, R-6-W, N.M.P.M.

SAN JUAN COUNTY, NEW MEXICO



0 500 1000
SCALE: 1"=1000'

- NOTES:
1. BASIS OF BEARING: AS MEASURED BETWEEN MILE CORNERS #244 & #245 ON THE NM/CO STATE LINE.
BEARS: S 89°38'55" W - 5295.09'
 2. ALL BEARINGS & DISTANCES SHOWN ARE BASED UPON THE NEW MEXICO COORDINATE SYSTEM, WEST ZONE, NAD 83.
(COMBINED SCALE FACTOR: 0.9996385)

OWNER	STATION	FEET/RODS
ROSA JOINT VENTURE	0+00 TO 0+13.47	13.47/0.816

I, MARSHALL W. LINDEEN, BEING A PROFESSIONAL SURVEYOR IN THE STATE OF NEW MEXICO, DO HEREBY CERTIFY THAT THE SURVEY REPRESENTED BY THIS PLAT WAS MADE UNDER MY DIRECT SUPERVISION AND THAT THIS PLAT ACCURATELY REPRESENTS THIS SURVEY TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Marshall W. Lindeen
MARSHALL W. LINDEEN P.S. #17078
5-15-14
DATE

BURLINGTON
RESOURCES OIL & GAS COMPANY LP

UNITED
FIELD SERVICES INC.

P.O. BOX 3651
FARMINGTON, NM 87499
OFFICE: (505) 334-0408

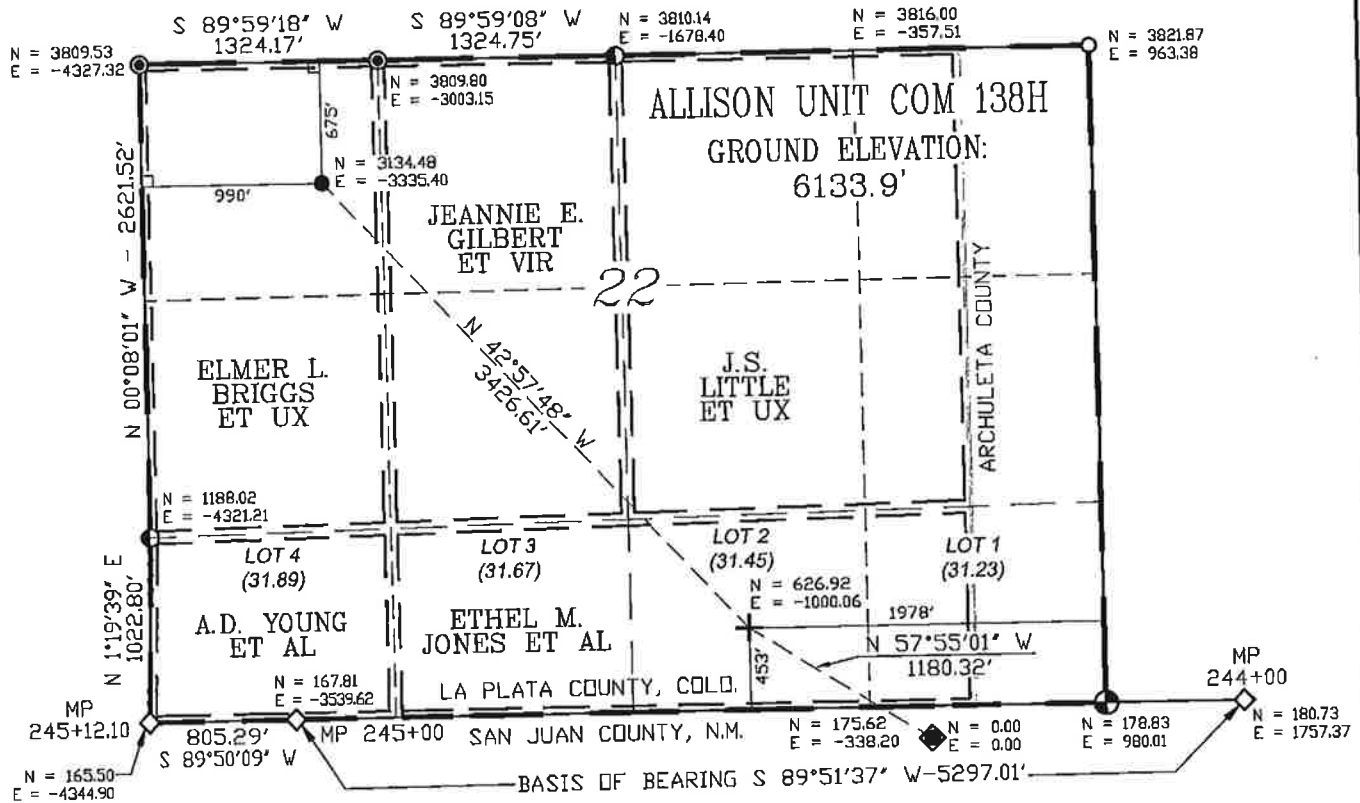
DWG. NO.: 10730A01	REVISION: 1
DRAWN BY: HS	DATE DRAWN: 05/07/14
SURVEYED: 04/07/14	APP. BY: M.W.L.
	SHEET: 1

Exhibit 1

BURLINGTON RESOURCES OIL & GAS COMPANY LP

ALLISON UNIT COM 138H

176' FNL & 2615' FWL (SURFACE), SEC. 8, SAN JUAN COUNTY, N.M.
675' FNL & 990' FWL (BOTTOM HOLE) SEC. 22, LA PLATA COUNTY, COLO.
OF T-32-N, R-6-W, N.M.P.M.,
GROUND ELEVATION: 6133.9'



NOTES

1. SURFACE BEARINGS AND DISTANCES ARE SHOWN.
2. NORTHING & EASTING COORDINATES ARE REFERENCED TO LOCALIZED SYSTEM WITH THE SURFACE LOCATION DEFINED AS THE ORIGIN.
3. BEARINGS & DISTANCES SHOWN ARE BASED ON GPS OBSERVATIONS WITH A LOCALIZED TRANSVERSE MERCATOR PROJECTION, PROJECTED TO GROUND COORDINATES WITH THE ORIGIN AT THE WELL FLAG LOCATION.

LEGEND

- ◆ SURFACE LOCATION
- BOTTOM HOLE LOCATION
- 1965 B.L.M. BRASS CAP
- ⊙ 1965 B.L.M. BRASS CAP (CC)
- ⊙ ALUMINUM CAP LS #17482
- ALUMINUM CAP LS #33648
- ◇ MILE POST (244+00, 245+00, 245+12.10)
- L DENOTES 90° TIE
- ⊕ PRODUCTION INTERVAL START

GEO. SURFACE VALUES

LATITUDE (NAD 83)
NORTH 36.9996502°
LONGITUDE (NAD 83)
WEST 107.4819170°



BASIS OF BEARING

AS MEASURED BETWEEN MILE POSTS
244 & 245 ON THE NEW MEXICO / COLORADO STATE LINE.
BEARS: S 89°51'37\" W - 5297.01'

BURLINGTON
RESOURCES OIL & GAS COMPANY LP



P.O. BOX 3651
FARMINGTON, NM 87499
OFFICE: (505) 334-0408

SCALE: 1" = 1000' JOB No. 10730 DATE: 05/12/14

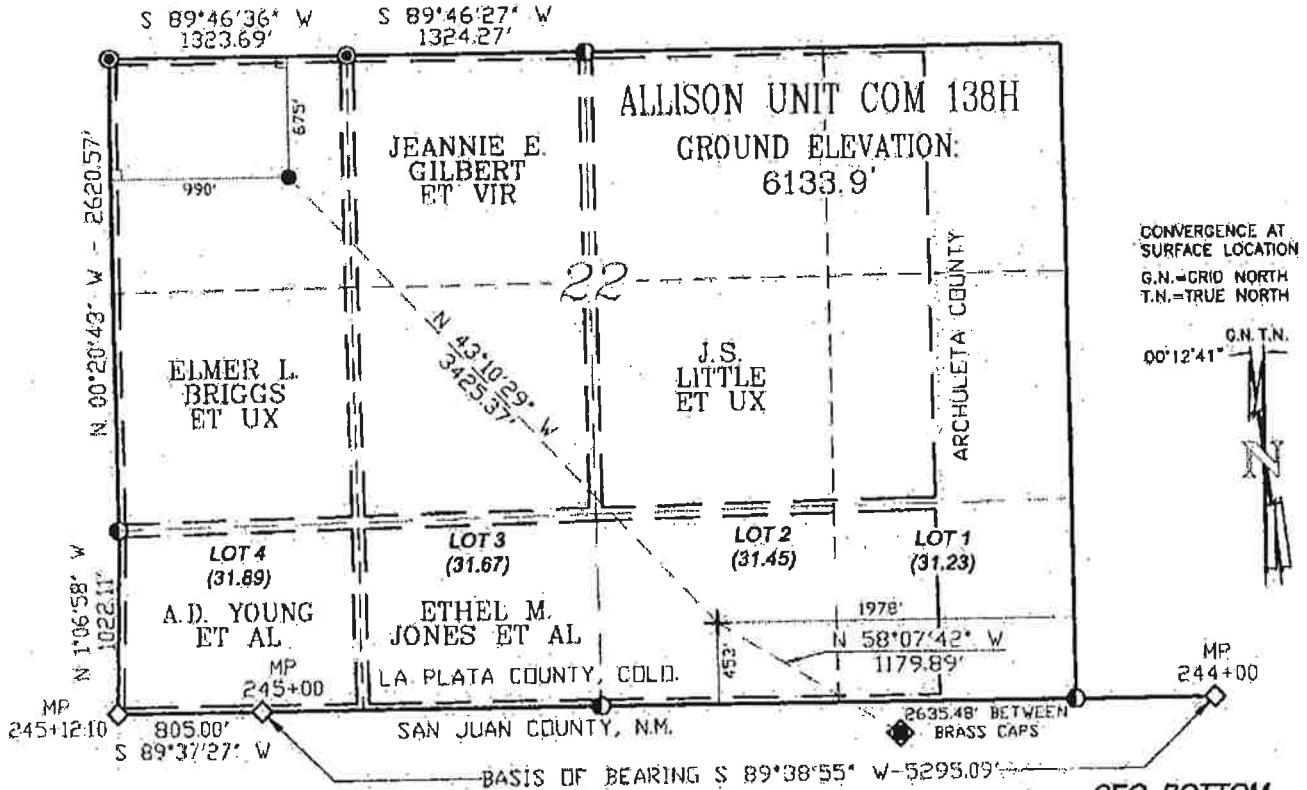
DRILLER'S DIAGRAM FOR
BURLINGTON RESOURCES OIL & GAS COMPANY LP
ALLISON UNIT COM 138H

SURFACE: 176' F/NL & 2615' F/WL, SEC. 8,
T. 32 N, R. 6 W, N.M.P.M. SAN JUAN COUNTY, N.M.
BOTTOM HOLE: 675' F/NL & 990' F/WL, SEC. 22,
T. 32 N, R. 6 W, N.M.P.M. LA PLATA COUNTY, COLO.

BY: H.S. DWG.#: 10730DS1 REV. DATE: 01/12/15

Exhibit 1

T. 32 N., R. 6 W.



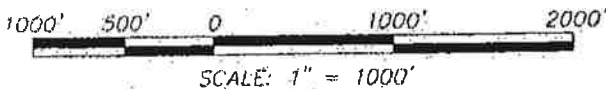
CONVERGENCE AT
SURFACE LOCATION
G.N.=GRID NORTH
T.N.=TRUE NORTH



BASIS OF BEARING/DATUM

NM SP WEST (1983) - NAVD 88 ELEV., GPS OBSERVATIONS:
AS MEASURED BETWEEN MP 244 & MP 245 ON THE
NEW MEXICO/COLORADO STATE LINE

BASIS OF ELEVATION: AS MEASURED AT OPUS ADJUSTED CONTROL POINT
LOCATED IN THE SW¼ OF SECTION 9, ELEVATION: 6148.68'.
T-32-N, R-6-W, N.M.P.M., SAN JUAN COUNTY, NEW MEXICO



GEO. SURFACE VALUES

LATITUDE (NAD 83)
NORTH 36.9996502°
LONGITUDE (NAD 83)
WEST 107.4819170°

LATITUDE (NAD 27)
NORTH 36°59.97871'
LONGITUDE (NAD 27)
WEST 107°28.87870'

GEO. BOTTOM HOLE VALUES

(CALCULATED BOTTOM HOLE VALUES
DERIVED FROM COP DESIGN FOOTAGES)

LATITUDE (NAD 83)
NORTH 37.0082561°
LONGITUDE (NAD 83)
WEST 107.4933363°

LATITUDE (NAD 27)
NORTH 37°00.49507'
LONGITUDE (NAD 27)
WEST 107°29.56382'

PRODUCTION INTERVAL START

(CALCULATED VALUES)

LATITUDE (NAD 83)
NORTH 37.0013715°
LONGITUDE (NAD 83)
WEST 107.4853406°

LATITUDE (NAD 27)
NORTH 37°00.08199'
LONGITUDE (NAD 27)
WEST 107°29.08410'

NOTE:

P.D.O.P. VALUE: N/A
BOTTOM HOLE IS CALCULATED
POSITION. SURFACE USE IS
NOT APPLICABLE.

SURVEYOR'S STATEMENT:

I, Marshall W. Lindeen, of Farmington, New Mexico, hereby state: This plat was made
from notes taken during an actual survey under my direct supervision on APRIL 07,
2014, and it correctly shows the location of ALLISON UNIT COM 138H



LEGEND

- ◆ SURFACE LOCATION
- BOTTOM HOLE LOCATION
- 1965 B.L.M. BRASS CAP

- ⊙ ALUMINUM CAP LS #17482
- ◇ MILE POST (244+00, 245+00, 245+12.10)
- L DENOTES 90° TIE

BURLINGTON

RESOURCES OIL & GAS COMPANY LP

**PLAT OF DRILLING LOCATION FOR
BURLINGTON RESOURCES OIL & GAS COMPANY LP
ALLISON UNIT COM 138H**

**SURFACE: 176' F/NL & 2615' FWL, SEC. 8,
T. 32 N, R. 6 W, N.M.P.M. SAN JUAN COUNTY, N.M.,
BOTTOM HOLE: 675' F/NL & 990' FWL, SEC. 22,
T. 32 N, R. 6 W, N.M.P.M. LA PLATA COUNTY, COLO.**

UNITED
FIELD SERVICES INC.

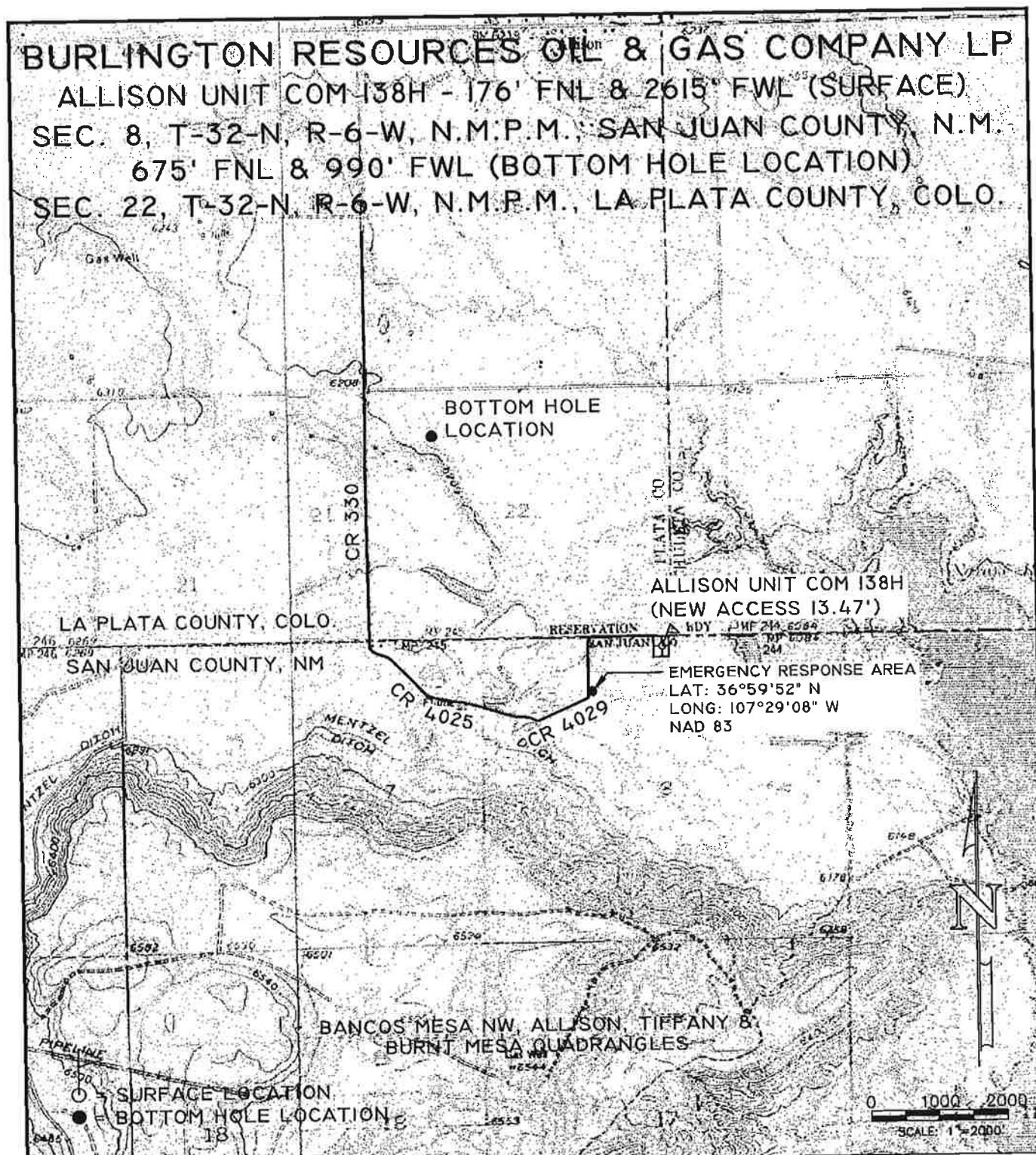
P.O. BOX 3651
FARMINGTON, NM 87499
OFFICE: (505) 334-0408

SCALE: 1" = 1000'

JOB No. 10730

DATE: 05/07/14

Exhibit 1



SURFACE TYPE: ROSA JOINT VENTURE
 176' FNL, 2615' FWL (SURFACE) SEC. 8 (NM)
 FOOTAGES: 675' FNL, 990' FWL (BOTTOM HOLE) SEC. 22 (CO)
 8 (NM)
 SEC. 22 (CO) TWN. 32 N RNG. 6 W N.M.P.M.
 LAT: N 36.9996502° LONG: W 107.4819170° (NAD 83)
 ELEVATION: 6134

BURLINGTON
 RESOURCES OIL & GAS COMPANY LP

UNITED
 FIELD SERVICES INC.

P.O. BOX 3651
 FARMINGTON, NM 87499
 OFFICE: (505) 334-0408

DWG. NO. : 10730T01	REVISION: 3
DRAWN BY: HS	DATE DRAWN: 05/07/14
SURVEYED: 04/07/14	APP. BY: M.W.L.
	REV. DATE: 01/12/15
	SHEET: 1