

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF HEARING:**

**APPLICATION OF RICHARDSON OPERATING COMPANY
TO AMEND DIVISION ORDER R-10656-A FOR
COMPULSORY POOLING AND AN UNORTHODOX COAL-GAS
WELL LOCATION, LEA COUNTY, NEW MEXICO**

**13322
CASE ~~13247~~**

PRE-HEARING STATEMENT

**Richardson Operating Company submits this pre-hearing statement as required by
the New Mexico Oil Conservation Division.**

APPEARANCES OF THE PARTIES

APPLICANT

**Richardson Operating Company
501 Airport Drive, Suite 119
Farmington, NM 87401
Attn: Anne Jones
505-564-8115**

ATTORNEY

**Thomas Kellahin, Esq.
P. O. Box 2265
Santa Fe, New Mexico 87504
505-982-4285**

OPPONENT

none

ATTORNEY

*425
8/31/04*

STATEMENT OF THE CASE**APPLICANT:**

Richardson Operating Company, in accordance with Section 70-1-17.C seeks to amend Division Order R-10656-A, a compulsory pooling order, to provide for the pooling all mineral interest within the vertical limits of the Basin Fruitland Coal Gas Pool underlying a standard 320-acre spacing unit consisting of the E/2 of Section 15, T29N, R13W, San Juan County, New Mexico for its optional infill well, the ROPCO "15" Well No. 2 that was drilled as a standard well location in Unit O of this section and the designation of Richardson Operating Company as the operator plus the standard provisions of the Division's compulsory pooling order including a 200% risk factor penalty in accordance with Commission Order R-11992, effective August 15, 2003.

Richardson requests that this application be processed in accordance with Division Rule 1607(A)(1)(b) and accordingly will submit its evidence by affidavit.

PROPOSED EVIDENCE**APPLICANT**

WITNESSES	EST. TIME	EST. EXHIBITS
Anne Jones, landman (by affidavit)	15-20 min	about 10

PROCEDURAL MATTERS

None

KELLAHIN & KELLAHIN



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