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

APPLICATION OF WILLIAMS PRODUCTION COMPANY, LLC FOR EXCEPTIONS TO THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL FOR A PILOT PROJECT TO DETERMINE THE PROPER WELL DENSITY REQUIREMENTS FOR MESAVERDE FORMATION WELLS, SAN JUAN AND RIO ARRIBA COUNTIES, NEW MEXICO.

CASE NO. 14291

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AMENDED ENTRY OF APPEARANCE & PRE-HEARING STATEMENT

APPEARANCES

<u>APPLICANT</u>

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APPLICANT'S ATTORNEY

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STATEMENT OF THE CASE

Applicant Williams is seeking exceptions to the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool for what it is referring to as "a two year Pilot Project" in the Rosa Unit Area. This proposed "Pilot Project" is to be comprised of the following lands located in San Juan and Rio Arriba, Counties, New Mexico:

TOWNSHIP 31 NORTH, RANGE 6 WEST, NMPM

Sections 1-5: All Sections 8-17: All Sections 21-26: All

TOWNSHIP 32 NORTH, RANGE 6 WEST, NMPM

Sections 32-36: All

Williams is further seeking authorization to drill additional wells on <u>each</u> of the standard 320-acre gas proration unit in the pilot project area to increase density from the current maximum of four wells as provided by "The Special Rules and Regulations for the Blanco-Mesaverde Gas Pool," to a maximum of eight wells (40-acre infill wells) per 320-acre gas proration unit. The referenced area is located approximately 9 miles Southeast of Arbolies, Colorado.

The subject area of the application is comprised of 26 sections, including all of the Rosa Unit in T31N, R6W and T32N, R6W. This 26-section area currently has a total of 162 active Blanco Mesaverde wells. This means that the area has only been approximately 78% drilled at the established spacing of 3 infill wells per 320 acres. The subject area constitutes 62% of that portion of the Rosa Unit that has Blanco Mesaverde wells.

To permit Williams to drill a new well on each spacing unit in the referenced area of application would be excessive for a pilot test, and more akin to an infill project. If Williams truly wishes to conduct pilot test, it should be restricted to a limited area or areas comprised of one of more sections which would be drilled per the proposed greater density, after which those areas could be studied for interaction and incremental reserve additions.

DIVISION'S PROPOSED EVIDENCE

WITNESS:

ESTIMATED TIME:

Steven Hayden, OCD District III Geologist *by telephone*

20 minutes

PROCEDURAL MATTERS

None.

Respectfully submitted this 12th day of March, 2009 by

MIKAL ALTOMARE

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Attorney for the Oil Conservation Division

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was emailed to counsel for Williams Production Co., <u>Ms. Ocean Munds-Dry</u> at <u>OMundsDry@HollandHart.com</u>, and counsel for Devon Energy, <u>Mr. James Bruce</u> at <u>JamesBruc@aol.com</u> this 12th day of March, 2009.

Mikal Altomare