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 PURPOSES OF CONSIDERING:

CASE NO. 14291

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 AND APPROVAL OF UNORTHODOX WELL LOCATIONS FOR PROJECT WELLS, SAN JUAN AND RIO ARRIBA COUNTIES, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Williams Production Company c/o Vern Hansen One Williams Center 25th Floor P. O. Box 3102 Tulsa, Oklahoma 74101

OTHER PARTY

Devon Energy Production Company, L. P.

ATTORNEY

William F. Carr Ocean Munds-Dry Holland & Hart LLP 110 N. Guadalupe St. Suite 1 Santa Fe, NM 87501 (505) 988-4421 (505) 983-6043 (Fax)

ATTORNEY

James Bruce, Esq. Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043 (505) 982-2151 Facsimile

STATEMENT OF CASE

APPLICANT

Applicant seeks exceptions to the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool for a two year Pilot Project in the Rosa Unit Area 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

Applicant also seeks the authorization to drill additional wells on each 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.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	ESTIMATED TIME	<u>EXHIBITS</u>
Vern Hansen, Petroleum Landman	Approx. 10 minutes	Approx. 5
Margaret Lessenger Geologist	Approx. 15 minutes	Approximately 5
Ken McQueen, Reservoir Engineer	Approx. 20 minutes	Approx. 6

PROCEDURAL MATTERS

Williams has none at this time.

William F. Carr

Ocean Munds-Dry

Attorney for Williams Production Company

CERTIFICATE OF SERVICE

I certify that on March 11, 2009, I served a copy of the foregoing document to the following by Hand Delivery or by Facsimile:

James Bruce, Esq. Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2151 Facsimile ATTORNEY FOR

Deyon Energy Production Company, L.P.

William F. Car