

**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. 14289**

**APPLICATION OF WILLIAMS PRODUCTION CO., LLC  
FOR PRE-APPROVAL OF DOWNHOLE COMMINGLING  
IN THE ROSA UNIT, SAN JUAN AND RIO ARRIBA COUNTIES,  
NEW MEXICO.**

**RECORDED  
2005 MAR 11 PM 2 31**

**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

**ATTORNEY**

Ocean Munds-Dry  
Holland & Hart LLP  
110 N. Guadalupe St. Suite 1  
Santa Fe, NM 87501  
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**STATEMENT OF CASE**

**APPLICANT**

Applicant, in the above-styled cause seeks pre-approval for downhole commingling in the Basin Dakota Pool, Blanco Mesaverde Pool, and the Basin Mancos Pool in any and all existing and future wells in the Rosa Unit. The Rosa Unit is located in Township 32 North, Range 6 West, Township 31 North, Ranges 4, 5 and 6 West, NMPM, San Juan and Rio Arriba Counties.

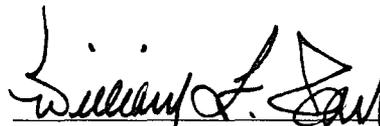
**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES	ESTIMATED TIME	EXHIBITS
Vern Hansen, Petroleum Landman	Approx. 10 minutes	Approx. 4
Ken McQueen, Reservoir Engineer	Approx. 15 minutes	Approx. 6

**PROCEDURAL MATTERS**

Williams has none at this time.

  
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Ocean Munds-Dry  
Attorney for Williams Production Company