

From: Ocean Munds-Dry [Omundsdry@hollandhart.com]
Sent: Thursday, June 03, 2010 5:02 PM
To: Fesmire, Mark, EMNRD
Cc: Smith, Mark A, EMNRD; Swazo, Sonny, EMNRD; Macquesten, Gail, EMNRD
Subject: Williams Case No. 14463

Chairman Fesmire:

I have reviewed the options with Williams that we discussed during our prehearing conference today for going forward on their C-144 application to: (1) file a new C-144 to use a closed loop system and haul the waste or (2) have the April 20 C-144 reviewed by the district office and then if denied, appeal the denial and have it considered on the July OCC docket. Williams would like to have the district office review the C-144 submitted on April 20th and assuming the application is denied, be placed on the Commission's July 15 docket. If the district office is able to review the application quickly, Williams will also request the Commission consider setting the application for a special hearing docket at the earliest possible date to accommodate mandatory notice requirements. For your information, the absolute drop-dead date to drill the Rosa SWD Well No. 2 this year is August 1st.

Williams respectfully requests that the district office immediately begin its review of the C-144 that was filed on April 20, 2010 by Williams. Since the application has been at the district office for more than a month and the application is not materially different from the January application, Williams hopes that a review could happen quickly. Additionally, I am told by Williams that a modified or amended C-144 for the Rosa Unit 634B is not required. In the past, the Aztec district office has required Williams to file two separate C-144s for each well when it co-locates/shares a pit. Williams files the first C-144 to reflect that the pit will take waste from the first well. Then when the well is drilled and completed, Williams files the next C-144 assigning the pit to the second well. No modification has been required on the first C-144. Thus, Williams did not amend its C-144 for the 634B.

Thank you for your time and consideration. Please let me know if you have any questions.

Ocean

Ocean Munds-Dry
Holland & Hart LLP
110 N. Guadalupe Suite 1
Santa Fe, NM 87501
Phone (505) 988-4421
Fax (866) 851-8340
E-mail: Omundsdry@hollandhart.com

HOLLAND & HART
THE LAW FIRM

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail. Thank you.

Before the OCC
Case 14521
Williams Production Co., LLC
OCD Exhibit 13