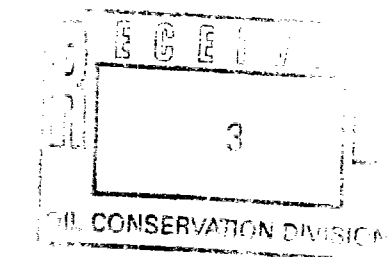


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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

APPLICATION OF RICHARDSON
OPERATING COMPANY FOR
DOWNHOLE COMMINGLING,
SAN JUAN COUNTY, NEW MEXICO.



No. 11106

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Richardson Operating Company
c/o Cathy Colby
1700 Lincoln, Suite 1700
Denver, CO 80203
(303) 830-8000

name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Richardson Operating Company, applicant in the above-styled cause, seeks approval to downhole commingle Basin-Fruitland Coal (Gas) Pool production with Pictured Cliffs gas production from either the Undesignated West Kutz-Pictured Cliffs Pool or the Undesignated Fulcher Kutz-Pictured Cliffs Pool within the wellbore of its proposed Ropco Federal "12" Well No. 2 to be drilled at a standard gas well location for all three pools in the SE/4 NE/4 (Unit H) of Section 12, Township 29 North, Range 13 West.

OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

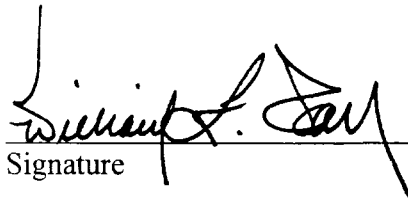
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Dana Delventhal, Petroleum Engineer	20 Min.	Approximately 8

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature