

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:

*WES.*  
CASE NO. 11570

APPLICATION OF RICHARDSON OPERATING COMPANY  
FOR COMPULSORY POOLING, DOWNHOLE COMMINGLING  
AND AN UNORTHODOX GAS WELL LOCATION,  
SAN JUAN COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by RICHARDSON  
OPERATING CO., as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Richardson Operating Co.  
1700 Lincoln, Suite 1700  
Denver, Colorado 80203  
(303) 830-8000  
attn: Cathy Colby

**ATTORNEY**

W. Thomas Kellahin  
KELLAHIN AND KELLAHIN  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

## STATEMENT OF RICHARDSON OPERATING COMPANY

Richardson has a working interest ownership in the oil and gas minerals underlying the NE/4 and the E/2 of Section 15, T29N, R13W, NMPM, San Juan County, New Mexico.

In order to minimize surface disturbance within the NE/4 of said Section 15, Richardson seeks approval to locate its ROPCO 15 GW "A" PC "B" FC Well No. 1 at an unorthodox well location for production for the Pictured Cliffs formation and the Basin Fruitland Coal Gas Pool.

Richardson has proposed to the other working interest owners that this well be drilled and completed for potential production from (a) any Pictured Cliffs formation to be dedicated to a 160-acre gas spacing and proration unit consisting of the SE/4 of said Section for production from either the Fulcher Kutz-Pictured Cliffs Gas Pool or the West Kutz-Pictured Cliffs Gas Pool; (b) any Fruitland Coal Gas formation to be dedicated to a 320-acre gas spacing and proration unit consisting of the E/2 of said Section for production from the Basin Fruitland Coal Gas Pool.

Despite its good faith efforts, Richardson has been unable to obtain a written voluntary agreement from all of the working interest and or mineral interest owners. Therefore, Richardson needs an order of the Division pooling the identified and described mineral interests in order to protect correlative rights and prevent waste.

Richardson also seeks approval for the downhole commingled production of these two pools.

PROPOSED EVIDENCE

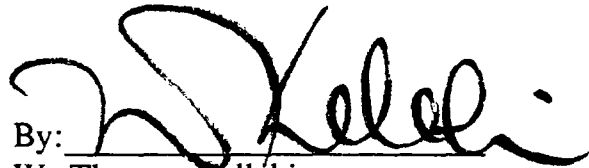
APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Cathy Colby (landman)	20 min.	@ 8 exhibits
Dana Delventhal (petroleum engineer)	30 Min.	@ 6 exhibits

**PROCEDURAL MATTERS**

None anticipated at this time.

KELLAHIN AND KELLAHIN

By:   
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