

**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 PRODUCTION
COMPANY FOR COMPULSORY POOLING,
SAN JUAN COUNTY, NEW MEXICO**

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CASE NO. 12644

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Holland & Hart LLP and Campbell & Carr, as required by the Oil Conservation Division.

OIL CONSERVATION DIVISION
01 APR 16 PM 3:58

APPEARANCES OF PARTIES

APPLICANT

Richardson Production Company
Attention: Cathleen Colby, Land Manager
1700 Lincoln, Suite 1700
Denver, Colorado 80203
(303) 830-8000

ATTORNEY

Michael H. Feldewert
Holland & Hart LLP and Campbell & Carr
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
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STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Pictured Cliffs formation in the following described spacing and proration unit in Section 8 Township 29 North, Range 14 West, NMPM, as follows: the SE/4 for all formations and/or pools developed on 160-acre spacing which includes but is not necessarily limited to the Twin Mounds Fruitland Sand-Pictured Cliffs Pool. Said unit is to be dedicated to the ROPCO Well No. 8-4 to be drilled at a standard location 1607 feet from the South line and 1451 feet from the East line of said Section 8. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Richardson Operating Company as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 2 miles northeast of Kirtland, New Mexico.

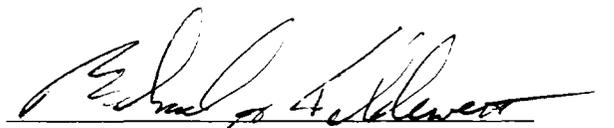
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Cathleen Colby (Land)	10 Minutes	Approximately 5
David Richardson (Geologist)	10 Minutes	Approximately 4

PROCEDURAL MATTERS

Applicant requests that this case be consolidated with Case No. 12643.


Michael H. Feldewert
Attorney for Richardson Production Company