

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:

CASE NO. 12854

APPLICATION OF RICHARDSON PRODUCTION COMPANY  
FOR COMPULSORY POOLING  
SAN JUAN COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by RICHARDSON PRODUCTION COMPANY, 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: David Richardson

**ATTORNEY**

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

NMOCD Case 12854  
Richardson Production Company  
Page 2.

### STATEMENT OF RICHARDSON PRODUCTION COMPANY

Richardson has a working interest ownership in the oil and gas minerals underlying the NW/4 of Section 21, T29N, R13W, NMPM, San Juan County, New Mexico.

Richardson has proposed to the other interest owners that this well be drilled for downhole commingled production from any Pictured Cliffs formation to be dedicated to a 160-acre gas spacing and proration unit consisting of the NW/4 of Section 21 for this production.

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 requests that Richardson Operating Company to named the operator

### PROPOSED EVIDENCE

#### APPLICANT:

#### WITNESSES

#### EST. TIME EXHIBITS

Anne Jones (landman)

15 min. @ 8 exhibits

David Richardson (geologist)

15 Min. @ 3 exhibits

### PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285