

**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 HEARING:**

**APPLICATION OF RICHARDSON OPERATING COMPANY
TO AMEND DIVISION ORDER R-10656-A FOR
COMPULSORY POOLING AND AN UNORTHODOX COAL-GAS
WELL LOCATION, LEA COUNTY, NEW MEXICO**

13322
~~CASE 13247~~

PRE-HEARING STATEMENT

**Richardson Operating Company submits this pre-hearing statement as required by
the New Mexico Oil Conservation Division.**

*WVJ
8/31/04*

APPEARANCES OF THE PARTIES

APPLICANT

**Richardson Operating Company
501 Airport Drive, Suite 119
Farmington, NM 87401
Attn: Anne Jones
505-564-8115**

ATTORNEY

**Thomas Kellahin, Esq.
P. O. Box 2265
Santa Fe, New Mexico 87504
505-982-4285**

OPPONENT

none

ATTORNEY

STATEMENT OF THE CASE

APPLICANT:

Richardson Operating Company, in accordance with Section 70-1-17.C seeks to amend Division Order R-10656-A, a compulsory pooling order, to provide for the pooling all mineral interest within the vertical limits of the Basin Fruitland Coal Gas Pool underlying a standard 320-acre spacing unit consisting of the E/2 of Section 15, T29N, R13W, San Juan County, New Mexico for its optional infill well, the ROPCO "15" Well No. 2 that was drilled as a standard well location in Unit O of this section and the designation of Richardson Operating Company as the operator plus the standard provisions of the Division's compulsory pooling order including a 200% risk factor penalty in accordance with Commission Order R-11992, effective August 15, 2003.

Richardson requests that this application be processed in accordance with Division Rule 1607(A)(1)(b) and accordingly will submit its evidence by affidavit.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EST. EXHIBITS
Anne Jones, landman (by affidavit)	15-20 min	about 10

PROCEDURAL MATTERS

None

KELLAHIN & KELLAHIN



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