

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

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

#4

APPLICATION OF WILLIAMS PRODUCTION
COMPANY FOR SIMULTANEOUS DEDICATION,
SAN JUAN COUNTY, NEW MEXICO.

Case No. 14719

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by San Juan Basin Resources LLC ("San Juan") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Williams Production Company

APPLICANT'S ATTORNEY

Ocean Munds-Dry ✓

OPPONENT

San Juan Basin Resources LLC
Suite 10C
1499 Blake Street
Denver, Colorado 80202

OPPONENT'S ATTORNEY

James Bruce ✓
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Sheryl A. Olson, CPL
(303) 573-6333

STATEMENT OF THE CASE

APPLICANT

OPPONENT

Applicant seeks an order approving simultaneous dedication of its proposed Rosa Unit Well No. 242A (a horizontal well) with the existing Rosa Unit Well No. 242. The E/2 of Section 33, Township 32 North, Range 6 West, N.M.P.M. is dedicated to wells in the Fruitland Coal formation. The terminus of Well No. 242A will be located 96 feet from the E/2 of Section 33, which is a communitized tract in which San Juan owns an interest.

The severely unorthodox location will drain Fruitland Coal reserves from San Juan's communitized well unit, and adversely affect its correlative rights. Therefore, San Juan opposes the application, in particular the well's proposed unorthodox location.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Sheryl Olson
(landman)

20 min.

Approx. 6

Duncan Shepherd
(engineer)

20 min.

Approx. 6

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
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(505) 982-2043

Attorney for San Juan Basin Properties LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 20th day of August, 2011 via United States Mail:

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James Bruce