

**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 PURPOSES
OF CONSIDERING:**

CASE NO. 14289

**APPLICATION OF WILLIAMS PRODUCTION CO., LLC
FOR PRE-APPROVAL OF DOWNHOLE COMMINGLING
IN THE ROSA UNIT, SAN JUAN AND RIO ARRIBA COUNTIES,
NEW MEXICO.**

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Williams Production Company
c/o Vern Hansen
One Williams Center
25th Floor
P. O. Box 3102
Tulsa, Oklahoma 74101

ATTORNEY

Ocean Munds-Dry
Holland & Hart LLP
110 N. Guadalupe St. Suite 1
Santa Fe, NM 87501
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STATEMENT OF CASE

APPLICANT

Applicant, in the above-styled cause seeks pre-approval for downhole commingling in the Basin Dakota Pool, Blanco Mesaverde Pool, and the Basin Mancos Pool in any and all existing and future wells in the Rosa Unit. The Rosa Unit is located in Township 32 North, Range 6 West, Township 31 North, Ranges 4, 5 and 6 West, NMPM, San Juan and Rio Arriba Counties.

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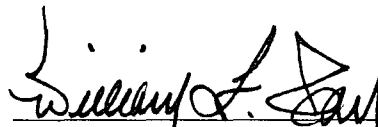
PROPOSED EVIDENCE

APPLICANT

| WITNESSES | ESTIMATED TIME | EXHIBITS |
|------------------------------------|--------------------|-----------|
| Vern Hansen, Petroleum Landman | Approx. 10 minutes | Approx. 4 |
| Ken McQueen, Reservoir Engineer | Approx. 15 minutes | Approx. 6 |

PROCEDURAL MATTERS

Williams has none at this time.



Ocean Munds-Dry
Attorney for Williams Production Company