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

CASE NO. 14335

APPLICATION OF WILLIAMS PRODUCTION CO., LLC
FOR PRE-APPROVAL OF NON-STANDARD LOCATIONS
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

Mr. Vern Hansen
Post Office Box 3102
Tulsa, Oklahoma 74101
(918) 573-6169

ATTORNEY

Ocean Munds-Dry
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OTHER PARTIES

Oil Conservation Division

ATTORNEY

Mikal Altomare
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 476-3451

STATEMENT OF CASE

APPLICANT

Applicant seeks pre-approval for non-standard locations in the Basin Fruitland Coal Gas Pool, Rosa Pictured Cliffs Pool, Carracas-Pictured Cliffs Pool, Blanco Mesaverde Pool, Cottonwood-Fruitland Sand Pool and the Basin Mancos Pool in the Rosa Unit in Township 32 North, Range 6 West, Township 31 North, Ranges 4, 5 and 6 West, NMPM, San Juan and Rio Arriba Counties. Williams requests pre-approval for non-standard locations due to topographical, archaeological, geologic, cultural and commingling factors.

PROPOSED EVIDENCE

APPLICANT

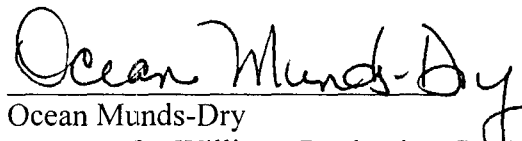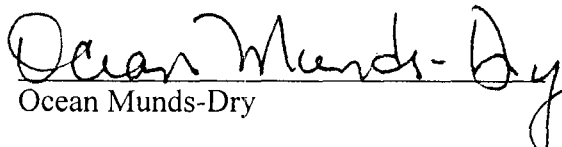| WITNESSES	ESTIMATED TIME	EXHIBITS
Vern Hansen Landman	Approx. 20 minutes	Approx. 10
Ken McQueen Petroleum Engineer	Approx. 20 minutes	Approx. 10

PROCEDURAL MATTERS

Williams has none at this time.

Ocean Munds-Dry
Ocean Munds-Dry
Attorney for Williams Production Co. LLC

CERTIFICATE OF SERVICE

I certify that on October 8, 2009 I served a copy of the foregoing document to the following by hand-delivery and email (Mikal.Altomare@state.nm.us)

Mikal Altomare
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Ocean Munds-Dry
Ocean Munds-Dry