

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

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APR 17 1995

Oil Conservation Division

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

CASE NO. 11247

APPLICATION OF RICHARDSON OPERATING COMPANY
FOR COMPULSORY POOLING, DOWNHOLE COMMINGLING
AND AN UNORTHODOX GAS WELL LOCATION,
SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 11243

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

**CONSOLIDATED
PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by RICHARDSON
OPERATING CO., as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT (Case 11247)

Richardson Operating Co.
1700 Lincoln, Suite 1700
Denver, Colorado 80203
(303) 830-8000
attn: Cathy Colby

ATTORNEY

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

APPLICANT (Case 11243)

Amoco Production Company

ATTORNEY

William F. Carr, Esq.
P. O. Box 2208
Santa Fe, New Mexico 87501
(505) 988-4421

STATEMENT OF RICHARDSON OPERATING COMPANY

Richardson has a working interest ownership in the oil and gas minerals underlying the SW/4 and the W/2 of Section 12, T29N, R13W, NMPM, San Juan County, New Mexico.

In order to minimize surface disturbance within the SW/4 of said Section 12, Richardson seeks approval to locate its ROPCO Federal 12 Well No. 3 at a point within 200 feet radius of the Amoco Burnham Gas Com Well No. 1, which is an existing Dakota producing well located 870 feet FSL and 1180 feet FWL of said Section 12.

Richardson has proposed to the other working interest owners that this well be drilled and completed as a "downhole commingled completion" for potential production from the Basin Fruitland Coal Gas Pool with any Pictured Cliffs production to be dedicated respectively to a 320-acre coal-gas spacing and proration unit consisting of the W/2 of Section 12 and to a 160-acre gas spacing and proration unit consisting of the SW/4 of said Section for production from either the Fulcher Kutz-Pictured Cliffs Gas Pool or the West Kutz-Pictured Cliffs Gas Pool.

Despite its good faith efforts, Richardson has been unable to obtain a written voluntary agreement from one of the working interest parties, Amoco Production Company. Therefore, Richardson needs an order of the Division pooling the identified and described mineral interests of Amoco Production Company in order to protect correlative rights and prevent waste.

PROPOSED EVIDENCE

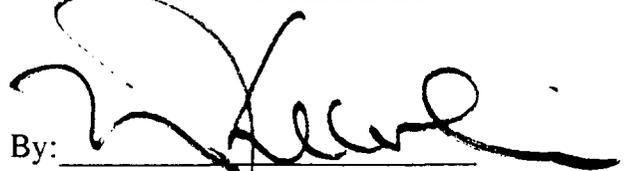
APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Cathy Colby (landman)	20 min.	@ 8 exhibits
David B. Richardson (geologist)	20 Min.	@ 3 exhibits
Dana Delventhal (petroleum engineer)	30 Min.	@ 6 exhibits
Rod Markham	30 Min.	@ 6 exhibits

PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN



By: _____
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