



July 5, 2011

VIA HAND-DELIVERY

Case 14719
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Ms. Jami Bailey, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Williams Production Co.'s Application for Simultaneous Dedication for the Rosa Unit Well No. 242A, Section 33, Township 32 North, Range 6 West, San Juan County, New Mexico.

Dear Ms. Bailey:

Williams Production Company ("Williams") is in receipt of San Juan Basin Properties, LLC's ("San Juan") objection to Williams' application for simultaneous dedication of the Rosa Unit Well No. 242A in Section 33, Township 32 North, Range 6 West, San Juan County, New Mexico.

Pursuant to Division Order No. R-13200, the well has been pre-approved to be at a non-standard location. Order No. R-13200 required Williams to remain 660 feet from any uncommitted acreage. The well is approximately 1452 feet from San Juan's acreage. In fact, San Juan's acreage in the E/2 of Section 33 is not adjoining the project area/spacing unit in the W/2 of Section 33 where Williams has requested simultaneous dedication.

Therefore, San Juan is not adversely affected by Williams' application and Williams respectfully requests that its application be approved administratively.

Your attention to this matter is appreciated.

Very truly yours,

Ocean Munds-Dry

Ocean Munds-Dry
Attorney for Williams Production Company

cc: James Bruce